Chichester Local Plan 2021 – 2039

**Duty to Cooperate**

**Statement of Compliance**

****

**April 2024**

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1. **Introduction**
	1. The Localism Act 2011 placed a statutory duty on local planning authorities (LPAs) and other bodies to cooperate with each other to address strategic issues relevant to their area during plan making.
	2. The duty to cooperate is not a duty to agree but LPAs should make every effort to secure the necessary cooperation on strategic cross boundary matters before submitting their Local Plan for examination.
	3. At examination, LPAs must demonstrate how they have complied with the duty. If an LPA cannot demonstrate that it has been complied with, then the Local Plan will not be able to proceed further in examination.
	4. In the [Procedure Guide for Local Plan Examinations](https://www.gov.uk/government/publications/examining-local-plans-procedural-practice)[[1]](#footnote-1) the Planning Inspectorate states that in order to demonstrate compliance with the duty to cooperate the most helpful approach is for the LPA to submit a statement of compliance with the duty and that the statement of compliance should identify any relevant strategic matters and how they have been resolved.
	5. This Statement, therefore, has been prepared to set out how the council has approached the duty to cooperate during the preparation of the Chichester Local Plan 2021 – 2039 (the Local Plan) and demonstrate how the council has complied with meeting the requirements of the duty. It identifies the strategic and key issues to be addressed and on which the council has sought to work collaboratively with neighbouring authorities and prescribed bodies. The engagement that has been undertaken as part of the preparation of the Local Plan is a continuation of the cooperation and joint working that has been ongoing for a number of years.
	6. The Statement was first published in January 2023 reflecting the engagement undertaken as part of the preparation of the Local Plan up until the Regulation 19 stage. The Statement has now been updated to set out the engagement undertaken between the Regulation 19 stage and the submission of the Local Plan.
	7. The Statement provides information on:
* the context for the duty to cooperate;
* identifying how, when and on what issues duty to cooperate bodies were engaged and how this has shaped the Local Plan;
* the strategic and cross boundary issues on which the council has engaged; and
* any outstanding strategic issues.
	1. The [National Planning Policy Framework (NPPF)](https://www.gov.uk/government/publications/national-planning-policy-framework--2)[[2]](#footnote-2) also advises that LPAs should prepare one or more statements of common ground with relevant bodies, using the approach set out in national planning guidance. The council are preparing statements with each of Chichester’s neighbouring local authorities and a number of other prescribed bodies.
	2. The council has also produced a Statement of Consultation, which sets out how the council has consulted other relevant bodies, and the local community, during the preparation of the Local Plan and this Statement should be read alongside it. The Infrastructure Delivery Plan (IDP) also provides information on the engagement and discussion the council have undertaken with infrastructure providers and service delivery organisations. Both the Statement of Consultation and IDP have been published and are available on the council’s website.
1. **What is the Duty to Cooperate?**

**Localism Act 2011**

* 1. The Localism Act 2011 introduced the concept of the duty to cooperate[[3]](#footnote-3). It places a legal duty on LPAs, county councils and prescribed bodies to ‘engage constructively, actively and on an ongoing basis’ to maximise the effectiveness of Local Plan preparation in relation to strategic matters.
	2. The duty requires that councils set out planning policies to address such matters and consider whether to enter into joint approaches to plan making.
	3. The Act also extended the purposes of the independent examination of a local plan to include determination as to whether the duty has been complied with[[4]](#footnote-4). At examination, the Inspector will assess whether the duty to cooperate has been met. As any failure in this regard cannot be rectified after the plan has been submitted for examination, where the duty has not been complied with the Inspector has no choice but to recommend non-adoption of the plan[[5]](#footnote-5).

**National Planning Policy Framework**

* 1. The Government’s expectations for maintaining effective cooperation are set out in paragraphs 24 to 27 of the NPPF. They state:
* Local planning authorities (LPA) and county councils (in two tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries;
* Strategic policy making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans and also engage with their local communities and relevant bodies;
* Effective and on-going joint working between strategic policy making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy;
* In order to demonstrate effective and ongoing joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross boundary matters being addressed and progress in cooperating to address these.
	1. In order to meet the Tests of Soundness at Examination, plans must be ‘positively prepared’ and ‘effective’. The NPPF (paragraph 35) indicates that:
* *Positively prepared* – *‘providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities ….’;*
* *Effective* – *‘…. based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.’*

**Planning Practice Guidance**

* 1. The national [Planning Practice Guidance](https://www.gov.uk/guidance/plan-making#maintaining-effective-cooperation) (PPG) provides further guidance on fulfilling the duty to cooperate. It indicates that:
* The duty to cooperate places a legal duty on LPAs and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan and marine plan preparation in the context of strategic cross boundary matters;
* Certain other public bodies are also subject to the duty to cooperate. These are prescribed by Regulations[[6]](#footnote-6);
* Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty, but LPAs and prescribed bodies must cooperate with them. LPAs must have regard to their activities when they are preparing their local plans, so long as those activities are relevant to plan-making;
* All parties should approach the duty in a proportionate way, tailoring cooperation according to where they can maximise the effectiveness of plans;
* If another authority will not cooperate this should not prevent the authority bringing forward a Local Plan or from submitting it for examination, but it will need to submit comprehensive and robust evidence of the efforts made to cooperate and any outcomes achieved.
	1. The PPG also provides guidance on the form and content of Statements of Common Ground (SoCG). SoCG are a written record of the progress made by strategic policy making authorities during the process of planning for strategic cross boundary matters. It documents where effective cooperation is and is not happening throughout the plan making process and is a way of demonstrating at examination that plans are deliverable over the plan period, based on effective joint working across local authority boundaries. In the case of LPAs it forms part of the evidence required to demonstrate that they have complied with the duty to cooperate.
	2. SoCG should be prepared and then maintained on an ongoing basis through the plan making process. As a minimum, a statement needs to be published when the area it covers and the governance arrangements for the cooperation process have been defined and substantive matters to be addressed are determined. If all the information required is not available (such as details of agreements on strategic matters) authorities can use the statements to identify the outstanding matters which need to be addressed, the process for reaching agreements on these and (if possible) indicate when the statement is likely to be updated.

**Strategic Matters**

* 1. A strategic matter is defined as[[7]](#footnote-7):
1. Sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas; and
2. Sustainable development or use of land in a two-tier area if the development or use is a county matter or would have a significant impact on a county matter.
	1. The NPPF (paragraph 25) states that: ‘Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans …’.
	2. The NPPF (paragraph 20) also identifies the matters that strategic policies should cover, namely:
3. *Housing (including affordable housing), employment, retail, leisure and other commercial development;*
4. *Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
5. *Community facilities (such as health, education and cultural infrastructure); and*
6. *Conservation and enhancement of the natural, built and historic environment including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*
7. **Chichester Duty to Cooperate Bodies**
	1. For Chichester, the duty to cooperate bodies are:
* Neighbouring Local Planning Authorities
	+ Arun District Council (ADC)
	+ East Hampshire District Council (EHDC)
	+ Havant Borough Council (HBC)
	+ Horsham District Council (HDC)
	+ South Downs National Park Authority[[8]](#footnote-8) (SDNPA)
	+ Waverley Borough Council (WBC)
* County Council
	+ West Sussex County Council (WSCC)
* Prescribed Bodies
	+ Environment Agency (EA)
	+ Historic England
	+ Natural England
	+ Civil Aviation Authority (CAA)
	+ Homes England
	+ NHS Sussex Integrated Care Board[[9]](#footnote-9)
	+ Office of Road and Rail (ORR)
	+ National Highways[[10]](#footnote-10)
	+ Marine Management Organisation
	1. Figure 1 illustrates the relationship between the area covered by the Chichester Local Plan and neighbouring LPAs.



**Figure 1: Chichester Local Plan – neighbouring authorities**

* 1. Local Enterprise Partnerships (LEPs) and Local Nature Partnerships (LNPs) are not subject to the requirements of the duty but LPAs must cooperate with them and have regard to their activities when preparing their Local Plans, provided those activities are relevant to plan making. For the plan area, the relevant bodies are the Coast 2 Capital LEP[[11]](#footnote-11) and the Sussex LNP.
	2. The duty also applies to the prescribed bodies below. However, given the strategic issues identified the Council consider it would be unnecessary and not effective to actively seek cooperation with them (1 and 2) or the plan area is not covered by such a body (3).
1. Mayor of London
2. Transport for London
3. Integrated Transport Authority
	1. In addition, the Council have also engaged with the following bodies in respect of specific issues of mutual interest, particularly meeting local housing need and cross boundary infrastructure impacts.
* Crawley Borough Council
* Fareham Borough Council
* Gosport Borough Council
* Guildford Borough Council
* Lewes District Council
* Mid Sussex District Council
* Portsmouth City Council
* Winchester City Council
* Adur District and Worthing Borough Councils
* Surrey County Council
* Hampshire County Council
	1. The Council is also a member of the West Sussex and Greater Brighton Strategic Planning Board (WS&GBSPB). It comprises of representatives of LPAs across West Sussex with West Sussex County Council, Brighton and Hove City Council, Lewes District Council and the South Downs National Park Authority. It seeks to identify those spatial planning issues that impact across the wider area and agree strategic priorities and policies to guide longer term strategic growth in a coordinated and well considered matter. The Strategic Planning Board agreed to commence work on Local Strategic Statement 3 (LSS3), which will cover the period 2030 – 2050, with the commissioning of evidence base studies. This includes a study of projected housing and employment needs, transport impact, infrastructure needs and spatial options to deliver the development needs and infrastructure. Following the enactment of the Levelling Up and Regeneration Act 2023 and intended repeal of the Duty to Cooperate, the WS&GBSPB are considering their future role.
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6. **Implementing the Duty to Cooperate**
	1. The Council has sought to take a constructive approach to engaging with duty to cooperate bodies during the course of preparing the Chichester Local Plan through:
* Inviting comments on evidence base studies from relevant bodies;
* Duty to cooperate meetings with officers of adjoining local authorities to share progress on plans, explore the opportunities for and scope of joint evidence work and discuss and agree the way forward on cross boundary issues;
* Subject specific meetings with appropriate bodies to discuss and progress strategic issues, for example with West Sussex County Council (WSCC) and National Highways on transport studies/modelling;
* Responding to Local Plan consultations of other relevant local authorities;
* Attendance at meetings of the West Sussex and Greater Brighton Strategic Planning Board;
* Attendance at meetings of West Sussex Planning Policy Officers Group and West Sussex and Greater Brighton Planning Officers Group which provides an opportunity to share information and discuss common issues with officers of neighbouring authorities and more widely;
* Involvement in Sussex Local Nature Partnership local authority network which provides an opportunity to access information and resources, knowledge sharing events and forums for sharing experiences and best practice across councils with a focus on the implementation of the requirement for Biodiversity Net Gain and development of the Local Nature Recovery Strategy;
* Working with other authorities affected by the issue of water neutrality in the Sussex North Water Resource Zone and other relevant stakeholders on development of an evidence base and attendance at meetings of the Chief Executive Board, Lead Officers Group, Planning Policy Working Group, Offsetting Implementation Group and Development Management Working Group;
* Involvement in the Chichester Water Quality Group, which includes representatives from the Council, Southern Water, Portsmouth Water, Environment Agency, Natural England, WSCC and Chichester Harbour Conservancy. The Group updates evidence relating to waste water treatment headroom and identifies the additional waste water treatment capacity needed over the plan period and the options for delivering this;
* Working with the Partnership for South Hampshire (PfSH) and other authorities affected by the issue of nutrients together with water companies, Natural England and the Environment Agency through the PfSH Water Quality Working Group (recently renamed the PfSH Natural Environment Group); and
* Ongoing letters, emails and meetings with neighbouring authorities and other bodies to discuss and progress strategic issues.

**Evidence base studies**

* 1. The council has sought to work jointly on strategic issues with duty to cooperate bodies and other partners through the production of evidence base and supporting documents to inform the development of the Local Plan. Several of these were carried out jointly or had input from neighbouring authorities or other duty to cooperate bodies. The following details this evidence base work:
* Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2019) – joint study undertaken by Chichester District Council, Arun District Council, Adur District Council and Worthing Borough Council. Key stakeholders, including seven neighbouring authorities, invited to provide views on range of issues relating to Gypsy and Traveller and Travelling Showpeople community within the council areas and surrounding area;
* Water Neutrality Study (2022) – joint study between Chichester District Council, Horsham District Council and Crawley Borough Council to quantify the scale of the water neutrality issue across the three council areas and to identify a proposed mitigation strategy to address this issue. The Study has also involved Natural England, Environment Agency, Southern Water and the South Downs National Park Authority;
* Strategic Flood Risk Assessment (SFRA) – Environment Agency, WSCC (as the Lead Local Flood Authority), Natural England, Southern Water, Portsmouth Water, Chichester Harbour Conservancy and neighbouring authorities (Arun DC, East Hampshire DC, Havant BC, Horsham DC, Waverley DC and South Downs National Park Authority) invited to share data and/or provide feedback on draft versions of the SFRA;
* Chichester Traffic Modelling – Stantec were commissioned to test the traffic impacts of new developments and transport infrastructure across Chichester. Key modelling assumptions and mitigation measures used in the modelling runs have been agreed by WSCC (as local highway authority) and National Highways. They also shared data and provided feedback on draft Transport Assessment reports;
* Sustainability Appraisal – in addition to the three statutory consultees, the Sustainability Appraisal Scoping Report was subject to consultation with WSCC, neighbouring local authorities (Arun DC, East Hampshire DC, Havant BC, Horsham DC, Waverley BC and South Downs National Park Authority), the Primary Care Trust and National Highways;
* Infrastructure Delivery Plan (IDP) – as part of preparing the IDP neighbouring local authorities have been engaged to identify the infrastructure impacts of the Local Plan development distribution and site allocations.

**Working with Duty to Cooperate Bodies**

* 1. How, when and on what issues duty to cooperate bodies have been engaged during the preparation of the Local Plan are summarised in Table 1 with a record of engagement contained in Appendix 1.

**Table 1: Duty to Cooperate summary of engagement and cooperation**

| **Duty to Cooperate Body** | **Summary of engagement and cooperation** |
| --- | --- |
| Arun District Council | Arun DC is a statutory consultee as an adjoining local planning authority. Arun adjoins the eastern boundary of the southern plan area.Arun DC responded to consultations under Regulation 18. In response to the Preferred Approach Local Plan, Arun DC provided support subject to considering several actions to address potential unmet housing need. Duty to Cooperate meetings have discussed issues around housing need and distribution and transport impacts.The Arun Local Plan was adopted in 2018. A review of the Local Plan was paused in autumn 2021 but has now recommenced; a Regulation 18 consultation is planned for spring/summer 2024 with publication of a Regulation 19 Local Plan timetabled for spring 2026. Consultation on a Gypsy and Traveller DPD (under Regulation 18) took place in 2020 with publication of a Regulation 19 DPD in December 2023.A Statement of Common Ground is being prepared with Arun DC. |
| East Hampshire District Council | East Hampshire DC is a statutory consultee as an adjoining local planning authority. Only a small part of East Hampshire directly adjoins the plan area.East Hampshire DC had no comments to make to the Preferred Approach Local Plan but recognised the similar issues faced in relation to planning for housing with parts of each of the respective Districts lying within the South Downs National Park. No representations were received to the Regulation 19 Chichester Local Plan.East Hampshire DC undertook an Issues and Priorities consultation (under Regulation 18) in November 2022. Consultation on a draft Local Plan commenced in January 2024 with publication of a Regulation 19 Local Plan timetabled for summer 2024.A Statement of Common Ground has been agreed with East Hampshire DC. |
| Havant Borough Council | Havant BC is a statutory consultee as an adjoining local planning authority. Havant adjoins the western boundary of the southern plan area.Havant BC did not respond to the Preferred Approach Local Plan consultation. Havant BC were also consulted on revised distributions of development in 2020 and 2022. In responding to the latter consultation they made no specific comments but identified transport and waste water as issues to be discussed further through Duty to Cooperate liaison. No representations were received to the Regulation 19 Chichester Local Plan.Havant BC published a discussion document ‘Building a Better Future’ for consultation under Regulation 18 between October and November 2022. Consultation on a draft Local Plan is timetabled for late 2024 with publication of a Regulation 19 Local Plan in spring 2025.A Statement of Common Ground has been agreed with Havant BC. |
| Horsham District Council | Horsham DC is a statutory consultee as an adjoining local planning authority. Horsham District adjoins the eastern boundary of the north east plan area.Horsham DC generally supported the Preferred Approach Local Plan, whilst querying whether the number of dwellings expected to come forward through the making of Neighbourhood Plans was realistic.Horsham DC were also consulted on revised distributions of development in 2020 and 2022. In responding to the latter consultation they highlighted the potential impact on infrastructure within their administrative area from growth in the North of the Plan Area. The Horsham Local Plan is currently being reviewed and consultation on a Regulation 19 Local Plan commenced in January 2024 with adoption timetabled for spring 2025.A Statement of Common Ground is being prepared with Horsham DC. |
| South Downs National Park Authority (SDNPA) | The SDNPA is a statutory consultee as an adjoining local planning authority. The National Park splits the Chichester Local Plan area into two: the southern plan area (east-west corridor and Manhood Peninsula) and the North of the Plan Area.SDNPA have responded to consultations under Regulation 18 providing comments on policy wording and site allocations, with a particular focus on ensuring the conservation and enhancement of the National Park is appropriately reflected in the Local Plan. Duty to Cooperate meetings have discussed issues around housing need and distribution, transport impacts, protected landscapes and the green environment.A review of the South Downs National Park Local Plan was commenced in 2022. Consultation on a draft plan (under Regulation 18) is timetabled for early 2025.A Statement of Common Ground is being prepared with the SDNPA. |
| Waverley Borough Council | Waverley BC is a statutory consultee as an adjoining local planning authority. Waverley adjoins the northern boundary of the North of the Plan Area.Waverley BC had no concerns about the Preferred Approach Local Plan but indicated the need to evidence any unmet housing need and that all options within Chichester’s HMA should be explored to deal with any meeting unmet need. No representations were received to the Regulation 19 Chichester Local Plan.Waverley BC were also consulted on revised distributions of development in 2020 and 2022. In responding to the latter consultation they raised concern about the potential impact on infrastructure if a significant level of growth in the North of the Plan Area were to be proposed. The Waverley Local Plan Part 1: Strategic Policies was adopted in February 2018 and Local Plan Part 2: Site Allocation and Development Management Policies in March 2023. WBC have resolved to undertake a comprehensive update of the Local Plan. Consultation on a preferred options Local Plan is expected during summer 2025.A Statement of Common Ground is being prepared with Waverley BC. |
| West Sussex County Council  | As part of a two-tier administrative area, WSCC provides statutory functions across the Plan Area, including education and highways. WSCC also responsible for a wide range of other services including transport planning, provision of community and social care infrastructure, public health, flood risk and minerals and waste and are also a landowner within the Plan Area. WSCC are a statutory consultee on the Local Plan and have responded to consultations under Regulation 18, as both a service provider and landowner. Their responses covered a range of issues, partly reflecting their wide service provider role, including points of clarification and detailed comments on policies and site allocations. WSCC have provided information on school place capacity in respect of the Local Plan development distribution options and individual site allocations, which has fed into the IDP preparation. In their role as Lead Local Flood Authority, WSCC have also provided technical input to the SFRA.CDC have worked closely with WSCC (and National Highways) on the transport modelling for the Local Plan, the highways mitigation schemes required and, in light of the limited availability of funding, the identification of an appropriate way forward to manage this.Statements of Common Ground are being prepared with WSCC covering transport and non-transport matters. |
| Environment Agency | The Environment Agency is a statutory consultee in the plan making process with responsibility for the protection and enhancement of the environment including water quality and resources, waste and contaminated land, rivers, conservation and ecology and flooding. They are also one of the designated environmental bodies for sustainability appraisal. The Environment Agency has been involved throughout the preparation of the Local Plan, responding to consultations under Regulation 18 with comments on the policies and site allocations. They were also provided with an informal opportunity to comment on relevant emerging Local Plan policies for inclusion in the Regulation 19 Local Plan. The Environment Agency have been involved in discussions on available wastewater capacity and are party to a Statement of Common Ground on wastewater (2024). As a technical consultee they have also provided information and comment on the SFRA, Strategic Wildlife Corridors and the SA Scoping Report.The Environment Agency were consulted on revised distributions of development in 2020 and 2022, providing general comments on the distribution and identifying site specific constraints in respect of potential allocations and policy criteria to address issues.A Statement of Common Ground has been agreed with the EA (and Southern Water) on wastewater treatment in the plan area. |
| Historic England | Historic England is the Government’s statutory advisor on the Historic Environment and is a statutory consultee in the plan making process. They are also one of the designated environmental bodies for sustainability appraisal. Historic England have been engaged throughout the preparation of the Local Plan responding to consultations under Regulation 18 with comments on the policies and site allocations. At the Preferred Approach stage Historic England suggested that the policies did not go far enough in terms of different heritage assets. The Council have taken on board their advice in relation to the Preferred Approach and in response drafted a suite of heritage policies for inclusion in the Regulation 19 Local Plan. Historic England were provided with an informal opportunity to comment on drafts of these policies and the Council have amended the policies in response to Historic England’s comments. Historic England were consulted on revised distributions of development in 2020 and 2022, providing general comments on the need to have regard to heritage impacts. |
| Natural England | Natural England is the Government’s advisor for the natural environment, with a responsibility for promoting nature conservation and protecting biodiversity, conserving and enhancing the landscape and promoting access to the countryside and open spaces. They are a statutory consultee in the plan making process and are also one of the designated environmental bodies for sustainability appraisal. Natural England has been involved throughout the preparation of the Local Plan, responding to consultations under Regulation 18 with comments on the policies and site allocations. At the Preferred Approach stage they raised concern that the proposed policy on wastewater management and water quality would not ensure that an adverse effect on the Chichester Harbour SPA/SCA/Ramsar would be avoided. The Council have sought to address this through redrafting of the relevant policies and Natural England were provided with an informal opportunity to comment on relevant emerging Local Plan policies for inclusion in the Regulation 19 Local Plan.Natural England have also responded to the Habitats Regulation Assessment which has been produced alongside the preparation of the Local Plan.A Statement of Common Ground is being prepared with Natural England. |
| Civil Aviation Authority | The Civil Aviation Authority is the UK’s specialist aviation regulator. The CAA have been consulted as a statutory consultee throughout the development of the Local Plan but have provided no comments to date. |
| Homes England | Homes England are an executive non-departmental public body that help to develop communities by investing in the building of new homes and increasing the supply of public land for development. They also regulate social housing providers.The Council met with Homes England (as part of a multi-organisation meeting) in June 2021 to discuss the availability of funding for the identified A27 junction mitigation schemes.Homes England (or their predecessor body the Homes and Communities Agency) have been consulted at all stages of the Local Plan preparation. They responded to the Preferred Approach consultation as owner of land in the area covered by Preferred Approach Policy AL5: Southern Gateway.  |
| NHS Sussex | NHS Sussex Integrated Care Board were set up on the 1 July 2022 taking on the commissioning functions previously carried out by West Sussex Clinical Commissioning Group (CCG). The main role of NHS Sussex is to agree the strategic priorities and resource allocation for all NHS organisations in Sussex.NHS Sussex (and previously the CCG) have been engaged in their role as a statutory consultee. They have had conversations with health partners to determine what may be required in terms of health infrastructure, including GP practices and health centres, in order to support the levels of development proposed through the Local Plan. This is reflected in the IDP. |
| Office of Road and Rail | The Office of Road and Rail is the independent safety and economic regulator for Britain’s railways. They are responsible for ensuring that railway operators are compliant with health and safety laws.Chichester District Council maintain engagement with the ORR through their role as a statutory consultee. The ORR did not respond to the Preferred Approach consultation or make representations to the Regulation 19 Local Plan.More information on rail infrastructure is detailed in the IDP following consultation with Network Rail and the train operator (Southern Railway). |
| National Highways | National Highways are responsible for the management and operation of the strategic road network (SRN). In the plan area, this relates to the A27.National Highways has been involved throughout the preparation of the Local Plan. At the Preferred Approach stage National Highways raised concern regarding the deliverability of the package of highway improvements proposed to mitigate impacts on the SRN. CDC worked closely with National Highways (and WSCC) on revised transport modelling for the Local Plan, the highways mitigation schemes required and, in light of the limited availability of funding, the identification of an appropriate way forward to manage this in developing the Regulation 19 Local Plan.CDC have continued to work with National Highways (and WSCC) following their Regulation 19 representation to resolve issues relating to the transport model and mitigation package.A Statement of Common Ground is being prepared with National Highways. |
| Marine Management Organisation | The Marine Management Organisation (MMO) license, regulate and plan marine activities in the seas surrounding England and Wales to ensure they are carried out in a sustainable way.Chichester District Council have maintained engagement with the MMO through their role as a statutory consultee. MMO responded to the Preferred Approach consultation and suggested the Plan should be amended to include reference to published guidance, including the South Marine Plan. The Council have made a number of changes to the Regulation 19 Local Plan to address this. No representations were received to the Regulation 19 Chichester Local Plan. |
| Coast 2 Capital LEP | The LEP is a partnership between businesses and local authorities with the aim of driving economic growth and sustainable success across the region.The Council have met with the LEP to discuss the availability of funding for the identified A27 junction mitigation schemes.The LEP did not respond to the Preferred Approach consultation or make representations to the Regulation 19 Local Plan. |
| Sussex LNP | The Sussex LNP is a voluntary partnership of over 30 organisations. The objectives of the LNP are to conserve, enhance and expand Sussex’s Natural Capital and to ensure that Sussex residents share in the benefits provided by health, well-functioning ecosystems.The LNP have been consulted at all stages but have not responded. |

**Regulation 19 Submissions**

* 1. Representations on the Chichester Local Plan 2021 – 2039 were invited between the 3 February and 17 March 2023. Details of the representations received and the main issues raised are set out in Statement of Consultation (Regulation 22(c)). The council received representations on the Regulation 19 Local Plan from the following Duty to Cooperate and prescribed bodies:
* Arun District Council
* Horsham District Council
* South Downs National Park Authority
* West Sussex County Council[[12]](#footnote-12)
* Environment Agency
* Historic England
* National Highways[[13]](#footnote-13)
* Natural England
	1. In addition, representations were received from Hampshire and Surrey County Councils in respect of cross boundary infrastructure impacts. Crawley Borough Council’s representation expressed support for the approach taken in Policy NE17 (Water Neutrality), the approach having been discussed and agreed jointly across the partner authorities, advised and supported by technical evidence.
	2. Appendix 2 provides a summary of the submitted representations, including objections made to the soundness of the Local Plan. The council have sought to discuss these where appropriate with the relevant DtC bodes and the action that could be taken to resolve the issues identified by them.
	3. The council have considered the representations and produced a response to them. For a number of the representations, the council consider a modification could be made to the Local Plan that would overcome the issue raised. In the case of other representations made, the council are of the view that the Plan is sound as drafted and no modification is required. Appendix 2, therefore, also sets out the council’s response including any suggested modification to the Local Plan[[14]](#footnote-14).
	4. There were no representations from any local planning authority or other prescribed body to the effect that the council had not complied with the Duty to Cooperate.

**Statements of Common Ground**

* 1. The council are preparing SoCG with a number of bodies, which provide further detail of the engagement and cooperation that has taken place. The SoCG prepared[[15]](#footnote-15) and their current status is set out in Table 2.
	2. The council are also party to a joint SoCG (July 2023) on water neutrality in the Sussex North Water Resources Zone with Crawley Borough Council, Horsham District Council, Mid Sussex District Council, South Downs National Park Authority and West Sussex County Council. The SoCG has also been endorsed by Southern Water, Natural England and the Environment Agency.

**Table 2: Statements of Common Ground**

|  |  |
| --- | --- |
| **SoCG with** | **SoCG latest position** |
| Arun District Council | Drafted but not yet agreed |
| East Hampshire District Council | Signed 18 January 2024 |
| Havant Borough Council | Signed 2 May 2024 |
| Horsham District Council | Circulated for signing |
| South Downs National Park Authority | Drafted but not yet agreed |
| Waverley Borough Council | Circulated for signing |
| West Sussex County Council (non transport) | Drafted but not yet agreed |
| West Sussex County Council (transport) | Drafted but not yet agreed |
| Environment Agency (with Southern Water) | Signed 30 April 2024 |
| Natural England | Drafted but not yet agreed |
| National Highways | Drafted but not yet agreed |
| Surrey County Council | Drafted but not yet agreed |
| Hampshire County Council | Drafted but not yet agreed |

1.
2. **Chichester Strategic Issues**

**Strategic Geographies**

* 1. The plan area covers that part of the district that lies outside of the South Downs National Park. However, economic, social and environmental issues extend beyond the plan area. These are summarised in the Table 3 below.

**Table 3: Strategic geographies**

| **Strategic Geographies** |  |
| --- | --- |
| **Issue** | **Area Covered** |
| Housing | Analysis of the housing market areas across the Coastal West Sussex and Greater Brighton area[[16]](#footnote-16) found that there was a complex picture across Chichester District with four separate Housing Market Areas (HMA) operating. The majority of the Chichester District is mainly located within the Chichester and Bognor Regis HMA, which extends into the eastern parts of Arun district. Parts of the north of the district are within the Guildford and Horsham & Crawley HMAs and a small part of the western part of the district around Southbourne and Westbourne have stronger links to Havant and the Portsmouth HMA. |
| Economy | In considering the appropriate geography for economic matters and the definition of the appropriate Functional Economic Market Area (FEMA) the analysis[[17]](#footnote-17) found that Brighton & Hove operated as the main economic centre within the study area. However, there was a clear influence from Crawley in the north and a distinct lack of connection between Brighton and Chichester. This suggested that there were three separate market areas around these towns. The study concluded that in defining the FEMAs there was justification for using same boundary as the HMAs (given commuting patterns are key drivers for defining both) but as there was some evidence that the economic influence of Chichester extended further to the east, as far as Littlehampton, the Chichester and Bognor Regis FEMA should reflect this. |
| Transport | The A27 is the only major route for traffic travelling east-west and is part of the strategic road network along the south coast of England. It carries not only traffic travelling through the plan area to reach destinations further east or west but also local traffic from the surrounding area. Congestion is known to occur on a daily basis during peak periods resulting in delays to traffic as well as being a constraint on the local economy. The adopted Chichester Local Plan includes a requirement to improve six junctions on the A27 to mitigate the impacts of development, some of which are also needed to mitigate the impacts of development in Arun District. |
| Infrastructure | Whilst for the most part infrastructure issues impact directly on the plan area itself there will be cross boundary implications in terms of transport (as set out above) and education/health where catchment areas cross local authority boundaries. Engagement with relevant service providers and neighbouring authorities should help determine the infrastructure needs required to support new development when and where they arise. |
| Environment | The Plan Area’s natural environment is rich in biodiversity and contains many of the UK’s mort important habitats, including the Chichester Harbour SPA/SAC/Ramsar. However, wildlife and the natural environment do not respect administrative boundaries and it is important to consider how matters relating to wildlife habitats, green infrastructure and landscape will be effectively planned for across administrative boundaries. The Habitats Regulations Assessment (HRA) considers the effect of the Local Plan on a number of European conservation sites within and beyond the Plan Area.  |

**Identified Strategic Issues**

* 1. The main strategic issues that have informed the duty to cooperate discussions for the Chichester Local Plan are based on the discussions with relevant duty to cooperate bodies and findings of the Local Plan evidence base studies. The key strategic issues are:
* Transport
* Meeting housing needs
* Housing distribution
* Meeting needs for Gypsy and Traveller and Travelling Showpeople
* Infrastructure (education, health and wastewater)
* Water Neutrality
* Nutrient Neutrality (for the Chichester and Langston Harbour SPA/Ramsar catchment)
* Flood management
* Natural environment
* Air quality

### *Transport*

* 1. One of the key strategic planning matters is the impact of the development proposed in the Chichester Local Plan on the road network (both strategic and local) within the Plan Area and in neighbouring local authorities, and how this can be mitigated.
	2. The council has worked throughout the preparation of the Local Plan with West Sussex County Council (the Local Highway Authority) and National Highways in gathering evidence to assess the impacts of growth in the Plan Area upon the road network[[18]](#footnote-18).
	3. The Preferred Approach Local Plan was accompanied by a Transport Study (2018), which modelled three scenarios based on different levels of growth including the scale of development envisaged in the Preferred Approach Plan. Both WSCC and National Highways agreed updates to the model used and trip rates to be used for the modelling of the scenarios. Meetings were held also with Havant Borough Council and Arun District Council at the outset of the Transport Study work to ensure committed development and mitigations within their administrative areas were included in the transport modelling Reference Case. The Study also considered the other neighbouring authorities of the South Downs National Park Authority, East Hampshire District Council, Waverley Borough Council and Horsham District Council, with projected demands from all four authorities included in the background growth of future travel demand.
	4. The Study found that subject to the implementation of a package of mitigation, the traffic movements arising from the Preferred Approach scenario would not have an unacceptable impact on the operation of the strategic and local road networks within the plan area or in neighbouring authorities. Whilst both West Sussex County Council and National Highways supported the findings of the 2018 Study and confirmed that the proposed package of measures would mitigate the adverse impacts of growth in the southern plan area, they highlighted the need for further work around deliverability and funding of the mitigation.
	5. Further technical work, which looked at when the mitigation would be required, deliverability and cost of the suggested major road schemes and further transport modelling of a revised development distribution (that still met housing needs in full) was undertaken and meetings held with the highway authorities and infrastructure funders (WSCC, National Highways, Homes England, Coast 2 Capital LEP). The outcome of this, was that it was recognised that from projected sources of funding (developer contributions via S106 and CIL) it would not be possible to fully secure the necessary funding for the required mitigation to be able to deliver the full level of development envisaged in the Preferred Approach Local Plan.
	6. The A27 Chichester By-Pass major improvement scheme was originally included in the Road Investment Strategy Pipeline for the period 2025-2030 (RIS3). As there was no certainty this scheme would be taken forward the council sought to work with the highway authorities to agree a development strategy that delivered as much development as possible in the southern plan area within an affordable and deliverable package of transport mitigation, taking into account all sources of available funding. In March 2023, however, it was confirmed by the Department for Transport that RIS3 pipeline schemes would be deferred to RIS4 (2030-2035). At this stage, funding is not guaranteed and its inclusion or otherwise in the final RIS4 programme is dependent on National Highways option development work.
	7. Continuous engagement with National Highways and WSCC led to an agreed position on a threshold of development (535dpa) to be tested through further traffic modelling. On the advice of National Highways, the council also sought to investigate, in light of the funding position, if the threshold of development could be supported by only implementing certain junction mitigation improvements along the A27 corridor, whilst maintaining the safety led operation of the A27 corridor, alongside a Monitor and Manage (M&M)[[19]](#footnote-19) approach that would assess whether or not a scheme of modal shift proposals could assist with the delivery of a lower housing number and would allow National Highways to access the resultant impacts as tolerable. Going forward, the council would continue to work with National Highways and WSCC (and others) as part of a proposed Transport Infrastructure Management Group (TIMG) to oversee the delivery of the M&M approach.
	8. The council understood that both National Highways and WSCC were in agreement with the above approach subject to consideration of the detail of the M&M package and progressed towards publication of the Regulation 19 Local Plan, whilst continuing to meet regularly with National Highways and WSCC on the detail of the M&M package. Following the Regulation 19 consultation, the council continued with its regular meetings with National Highways and WSCC in order to bring further clarity to the M&M proposals, as requested by National Highways in their Regulation 19 response. However, in summer 2023, National Highways raised a number of new issues, beyond those explicitly raised in its Regulation 19 response or indeed before which appeared to represent a significant and fundamental change in the way National Highways were approaching the impact of the emerging Chichester Local Plan and the transport mitigation required. This stemmed partly from the publication of Circular 01/22 (Strategic road network and the delivery of sustainable development) in December 2022, which resulted in a move away from specific highway led mitigation to one that considers sustainable transport as a key aspect of any potential future mitigation, alongside potential highway mitigation.
	9. A series of further meetings with National Highways and WSCC, at both officer level and between senior politicians from the Council and the local MP were held to discuss the issues raised and to identify a way forward to resolve them.
	10. Through these meetings considerable progress was made (as set out in the Transport Background Paper). In summary, the three main issues and the latest position in respect of resolving them, are:
* Age of the transport model – the council has undertaken work to verify the current day outputs of the model and agreement has been reached with National Highways that the existing transport model provides sufficient certainty to determine the likely broad impacts of the Local Plan on the SRN. Agreement has also been reached with National Highways and WSCC that the council will, as part of the M&M process, undertake a new transport model to inform the necessary mitigation and future review of the Local Plan
* Local Plan housing target – without an updated transport model National Highways is unable to confirm that it would not object to 638dpa or that it would not have a severe impact on the safety or function of the SRN. Based on the current transport model, and the uncertainty of the impacts of greater levels of growth alongside the deliverability of modal shift, the council’s approach following discussion with National Highways and WSCC, is to mitigate a level of housing delivery (575dpa) that can be accommodated through a M&M approach.
* Fishbourne and Bognor Road roundabouts – for the reasons previously outlined regarding the availability of funding, the council’s approach to transport mitigation (which at the time National Highways and WSCC were aligned with) in the Regulation 19 Local Plan was that improvements to the Fishbourne and Bognor Road roundabouts would be the starting point for mitigation and the M&M process would establish whether there were other proposals that could in addition or instead provide a more suitable form of mitigation. As part of the discussion with the highway authorities there has been a move away from this position and agreement reached that these two improvement schemes will continue to be considered but the actual schemes to be delivered on the A27 and elsewhere will now be determined from updated evidence as part of the M&M process.
	1. The Council is working towards finalising Statements of Common Ground with National Highways and WSCC that covers the above issues.
	2. Cross boundary transport issues also formed part of the discussion at Duty to Cooperate liaison meetings with Horsham DC, the SDNPA and Arun DC and this was reflected in their representations at Regulation 19 stage. The Regulation 19 representations from Hampshire County Council and Surrey County Council also raised cross boundary transport impacts.
	3. Horsham DC and the SDNPA both sought assurance over how the transport impacts on settlements within their respective areas from the proposed level of development in the North of the Plan Area had been considered. The traffic impact of growth scenarios in the North of the Plan Area was tested in the Chichester Transport Study (Local Plan Review Transport Assessment) (January 2023). The update of the Transport Assessment (2024) utilised the Horsham Transport model to assess the distribution of housing as contained in the Regulation 19 Local Plan. This testing indicated that because of the relatively small numbers and the dispersed nature of the development, the additional trip numbers from the proposed development was unlikely to have a material impact. The council is working towards finalising Statements of Common Ground with Horsham DC and the SDNPA that covers transport matters.
	4. The issues identified by Arun DC related to the impact of the constrained infrastructure approach in the Chichester southern plan area on the cross boundary funding of previously identified highway improvements in the A259 corridor and whether the approach to improving A27 junctions would limit the scope for Arun’s future plan making for additional growth. Discussions with Arun DC regarding finalising a Statement of Common Ground are ongoing.
	5. Hampshire County Council’s representation to the Regulation 19 Local Plan was concerned with how fully the impact of development on the A259 or other roads within Hampshire had been assessed and that the Chichester Transport Study did not provide sufficient evidence to conclude that any impacts were not severe. In discussion with Hampshire County Council it was identified that they were particularly concerned about the impacts on the operation of two specific junctions on the A259. Their representation was also concerned that there was no reference to cross boundary highway capacity or sustainable transport mitigation. The Council’s highway consultants Stantec prepared a Technical Note (January 2024) that considered in the impacts of the Local Plan on the A259 in Hampshire, which was shared with Hampshire County Council. In response, Hampshire County Council have requested further information on the modelling undertaken. Discussions with Hampshire County Council, therefore, on the transport issues raised and seeking agreement on a Statement of Common Ground are ongoing.
	6. In their Regulation 19 representation Surrey County Council expressed no concerns regarding transport evidence and support for sustainable modes of transport. A Statement of Common Ground is currently being finalised.

### *Meeting housing needs*

* 1. Using the Government’s standard method the Local Housing Need (LHN) figure for Chichester, excluding that part of the district falling within the SDNP, is 638 dwellings per annum (dpa).
	2. The Preferred Approach Local Plan was based on meeting the local housing need figure for the Plan Area in full, plus an allowance for accommodating unmet need arising from the South Downs National Park[[20]](#footnote-20). However, constraints to the capacity of the A27 have led to the council planning for a housing requirement below the need derived from the standard method, namely 575 dpa (535 dpa in the southern plan area and 40dpa in the North of the Plan Area).
	3. As a result of not meeting the identified housing needs, the council was unable to accommodate any unmet need from that part of the South Downs National Park within Chichester District. The SDNPA have commissioned a new HEDNA to inform the review of the South Downs Local Plan, which will identify a local housing need figure for the South Downs National Park area. The HEDNA (2023) has assessed a housing figure of 102 dpa for that part of the National Park within Chichester District. At the present time, the SDNPA are unable to confirm how much of that need may be able to be accommodated within the National Park. The Council are preparing a Statement of Common Ground with the South Downs National Park Authority.
	4. Through duty to cooperate meetings the council has raised the issue of unmet housing needs with individual neighbouring authorities. The council has also engaged with authorities whose area falls wholly or partly within the HMA’s covering the plan area, even if they are not immediately adjoining the plan area, on the issue of unmet housing need.
	5. In December 2021, the council wrote to all neighbouring authorities and those authorities within the wider area to establish if they were able to accommodate any of Plan Area’s unmet housing need. The outcome of this request is set out in Table 4. No authorities responded to confirm that they could take any unmet needs from the Chichester Local Plan Area, although both Arun District and East Hampshire District Councils indicated that they would be willing to explore further whether they would be able to meet some of Chichester’s unmet need.

**Table 4: Outcome of Duty to Cooperate December 2021 letter on unmet housing need**

| **Authority** | **Response** |
| --- | --- |
| **Neighbouring authorities** |  |
| Arun District Council | Face similar issues with A27 capacity, mitigation and viability, which may constrain future housing growth and Arun’s ability to accommodate its own housing requirements (once these have been evidenced). At this time Arun unable to confirm what numbers it may be able to accommodate and whether that may be able include any element of shortfall from adjoining authorities. |
| East Hampshire District Council | Meeting took place in February 2023 to discuss further. |
| Havant Borough Council | No response received |
| Horsham District Council | Taking account of own high housing targets, and those of the unmet needs of the authorities with whom have a very direct relationship in housing market terms, it is considered that it is unlikely for Horsham to be able to accommodate CDC unmet needs. |
| South Downs National Park Authority | No response received.  |
| Waverley Borough Council | In February 2018 adopted Plan, Waverley seeking to meet its own identified needs in full, as well as fifty percent of the unmet need from Woking Borough, which is in the same Housing Market Area. There are also significant environmental constraints in Waverley. Therefore, to not consider that Waverley is in a position to accommodate any of the unmet need that may arise in Chichester District. |
| **Other authorities** |  |
| Crawley Borough Council | Crawley has tight administrative boundaries and its constraints mean that it also has limited opportunities to deliver the housing need arising from within the Borough, only 44-48% of Crawley’s housing needs for the new plan period can be met within the Borough. As such, unable to meet any unmet needs arising from Chichester through the draft Crawley Local Plan review process. |
| Fareham Borough Council | Fareham unable to accommodate unmet needs. Fareham following stepped approach in early plan area to meet own needs and already accommodating unmet need from South Hampshire sub-region. Were additional sites available would be prudent for Fareham to add sites to own supply to bolster ability to meet own need. |
| Gosport Borough Council | Gosport unable to consider accommodating unmet need at this stage. Gosport dealing with own unmet housing need and restricted supply of housing sites. |
| Guildford Borough Council | Guildford unable to accommodate unmet needs. Guildford SHMA found limited functional links between two authorities and within different housing market areas. If unmet needs do need to be met in first instance should be directed to local authorities within CDC housing market area. |
| Lewes District Council | Lewes unlikely to be able to meet own housing need or have capacity to meet unmet need of other authorities due to environmental, landscape and infrastructure constraints. |
| Mid Sussex District Council | No change in position since 2014 MoU, given relative distance between authorities would not be sustainable for Mid Sussex to meet CDCs general housing needs. Mid Sussex would give priority to authorities within North West Sussex HMA and then Greater Brighton area. |
| Portsmouth City Council | Portsmouth currently revising housing land supply position in response to recent regulation 18 consultation. Work undertaken so far indicates that the City Council will have an unmet housing need of its own and is therefore not in a position to be able to accommodate the unmet need.  |
| Winchester City Council | Unable to confirm until further work on housing need at sub-regional and local plan level has progressed but query whether most appropriate authority to meet unmet need given different HMAs and distance from Chichester.  |

* 1. Duty to Cooperate meetings were held with East Hampshire DC (May 2022) and Arun District Council (October 2022) to discuss relevant cross boundary strategic issues including unmet housing needs.
	2. At the meeting with East Hampshire DC, it was concluded that linkages between Chichester District and East Hampshire District are present to a much lesser extent in areas outside of the South Downs National Park, being quite remote from the Chichester Local Plan Area. The availability of sites in East Hampshire (in the A31 corridor) were distant from the Plan Area, with no direct transport connections, and were therefore unlikely to be suitable for meeting housing needs associated with the Chichester Local Plan area. However, East Hampshire DC would continue work on testing of options for their Local Plan Review including meeting the unmet needs of neighbouring authorities[[21]](#footnote-21). The Regulation 18 Draft East Hampshire Local Plan 2021 – 2040 (January 2024) highlighted the significant level of unmet housing need in the South Hampshire sub-region and indicated that any dwellings surplus to the identified requirements for the East Hampshire Plan Area could go some way to address those unmet needs. A signed Statement of Common Ground (January 2024), between the Council and East Hampshire DC setting out the currently agreed position on unmet needs has been published.
	3. Arun District Council confirmed in October 2022 that work on progressing their Local Plan review remained paused and that their local housing need figure or whether they would be able to meet it was not yet known. The situation, therefore, was unchanged from their response to the December 2021 letter.
	4. In December 2022, the council wrote again to neighbouring authorities and those in the wider area to establish if there had been any change in circumstances that would enable them to accommodate some or all of the unmet housing need arising from the Plan Area.
	5. The responses to this request are set out in Table 5.

**Table 5: Outcome of Duty to Cooperate December 2022 letter concerning unmet housing need**

| **Authority** | **Response** |
| --- | --- |
| **Neighbouring authorities** |  |
| Arun District Council | Pause to Local Plan was maintained in July 2022 so circumstances remain unchanged and Arun is not in a position to confirm whether any unmet need arising from neighbouring authorities can be accommodated |
| East Hampshire District Council | Currently consulting at Reg18 stage again and are at early stages of considering key priorities. Too early in process to identify any capacity to meet others unmet needs. At this stage, don’t know whether can meet our own needs, or any of that from the South Downs National Park. |
| Havant Borough Council | No response received[[22]](#footnote-22)  |
| Horsham District Council | No response received |
| South Downs National Park Authority | At early stages of Local Plan review. NPPF states national parks have highest status of protection in relation to landscape and scenic beauty and scale and extent of development within designated areas should be limited. Environment Act also requires CDC to have regard to purposes of National Park. Unlikely, therefore, will be able to accommodate any need arising in District outside National Park. Note that letter sent to SDNPA, before Government’s consultation on NPPF changes and Secretary of State announcements that housing numbers should be an advisory starting point and not mandatory. |
| Waverley Borough Council | Waverley are in process of reviewing Local Plan Part 1 (LPP1), which sets out strategic policies. Recognise current uncertainty Chichester and other neighbouring authorities have in meeting assessed needs because of development constraints; Waverley is in same position. Waverley is also meeting proportion of Woking’s unmet housing need in addition to assessed needs in adopted LPP1. As such, consider will not be able to accommodate development needs from neighbouring areas in any update to LPP1 |
| **Other authorities** |  |
| Crawley Borough Council | No response received |
| Fareham Borough Council | Now at later stages of plan preparation having gone through examination hearings and recent consultation on Inspector’s Main Modifications.Throughout preparation of Plan, housing figures increased and worked hard to find sufficient sites to meet own need; all housing sites found to be deliverable/developable either has permission or is allocation in Local Plan. Plan also includes contribution to sub-regional unmet need. Inspector so far not expressed any fundamental concern with housing supply nor contribution to unmet need. Contribution to unmet need also deemed acceptable by other PfSH members as confirmed in Statement of Common Ground.Should note Inspector has requested Council inserts statement in Local Plan requiring consideration of need for early review for reasons such as if PfSH work concludes Fareham should make additional contribution to meet subregional unmet need. Unmet need of PfSH subregion would remain focus for Council and as result unlikely would be any capacity to assist with wider unmet needs outside subregion. |
| Gosport Borough Council | No response received |
| Guildford Borough Council | Nothing has changed since previous response in December 2021. |
| Lewes District Council | No response received |
| Mid Sussex District Council | Published draft Plan (under Regulation 18) in November 2022, which provides some oversupply to provide flexibility and resilience to housing supply in Mid-Sussex. As set out in December 2021 response, Mid Sussex predominately sits in the Northern West Sussex HMA, along with Crawley Borough Council and Horsham District Council. Within the HMA, Crawley is unable to meets its own housing need and unmet need from its current adopted Local Plan is met by Mid Sussex and Horsham. Progress on Crawley and Horsham Regulation 19 Local Plans has been delayed and therefore extent of unmet need in HMA is currently unknown.Mid Sussex’s first priority is to meet its own housing need; if there is any over-supply the next priority is to assist with unmet need from Northern West Sussex HMA. Subject to this being met next priority is to assist the Coastal HMA as there are some overlaps between Coastal HMA and southern part of Mid Sussex.Given above priorities, unlikely Mid Sussex would be able to assist in meeting Chichester’s unmet need. 2014 MoU identifies that given relative distance between two authorities would not be sustainable to attempt to meet general housing needs within each other’s districts and no change in circumstance to suggest this position has changed or that other areas have higher priority should Mid Sussex be in a position to make any contribution to needs arising outside its area. Most appropriate mechanism for addressing unmet need is through progression of LSS3. |
| Portsmouth City Council | No response received |
| Winchester City Council | Recently published Plan for consultation (Regulation 18) with a housing figure that allows for a modest buffer to cater for potential changes to ‘standard method’ and/or help with unmet needs of nearby authorities. PfSH has been working to identify and plan for housing needs of South Hampshire and this work has identified a large shortfall in provision. Given Winchester is in a different housing market to majority of Chichester District, would expect any surplus that Winchester may eventually identify to contribute to meeting needs of neighbouring PfSH authorities. |

* 1. Since December 2022, the issue of unmet housing need has continued to be raised at liaison meetings with the neighbouring authorities of Horsham District, Arun District and Havant Borough Councils. In July 2023, Arun District Council recommenced preparation of their Local Plan but are in the early stages of this (a Regulation 18 consultation is planned for spring/summer 2024) and are not in a position to confirm whether any unmet need arising from neighbouring authorities can be accommodated. A Statement of Common Ground has been agreed with Havant Borough Council setting out the agreed position on unmet housing need. Statements with Horsham and Arun Districts have been drafted but not yet agreed.
	2. Although no local authority has indicated at this time that they are in a position to accommodate some of the unmet need, the council will continue to explore how the unmet housing need of the plan area may be met elsewhere as neighbouring local plans come forward and opportunities may arise.
	3. In respect of authorities seeking the assistance of the council in meeting their unmet housing needs, in addition to the South Downs National Park, Worthing Borough Council formally requested (January 2021) the council’s assistance. The council advised that work was progressing on the Chichester Local Plan but there were significant infrastructure issues regarding delivery of the levels of development to meet Chichester’s own housing needs and the council was also aware there were unmet needs in authority areas more directly related to the Chichester Plan Area. As such, the council was unable to agree to meet any unmet needs arising from Worthing Borough.
	4. More recently, Crawley Borough Council formally requested (April 2023) the council’s assistance. In the council’s response to the Regulation 19 Crawley Local Plan, the council advised that it was not in a position to assist given the position in meeting its own housing need and, if it were able to accommodate any unmet need, it would first assist areas more directly related to the Chichester Plan Area. Horsham District Council and Havant Borough Council also wrote to the council in November 2023 and March 2024 respectively, outlining their unmet housing need and requesting confirmation as to whether the council could assist. As with Crawley, the council advised that it was not in a position to assist but this position would be kept under review for discussion at liaison meetings.
	5. In April 2024, Lewes District Council wrote to the council, as an authority within the wider HMA, to advise that it was likely there would be unmet housing need arising from their plan area and request that the council consider if this could be accommodated through the preparation of the Local Plan. As with previous approaches, outlined above, the council responded it was unable to assist and if it were able to take unmet need it would first look to assist those authorities more directly related to the Chichester Plan Area.

*Housing Distribution*

* 1. As detailed above, during the course of preparing the Local Plan the infrastructure constraints have necessitated the council to test revised distribution of development strategies (as set out in the Housing Distribution Background Paper). These have been shared with neighbouring local authorities and infrastructure providers (in December 2020, January 2022 and October 2022) and their comments sought on the key infrastructure or environmental constraints that would affect delivery of the strategy.

*Meeting needs of Gypsy and Traveller and Travelling Showpeople*

* 1. The Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) was updated in 2022. This identified a need for 158 pitches and 40 plots over the plan period. This figure encompasses the total level of need potentially related to travellers and further analysis is being undertaken to establish the level of need within that figure that would fall within the revised definition of travellers contained in Planning Policy for Traveller sites (December 2023) (PPTS). The council propose to meet the pitch need through the allocation of new sites and intensification of a number of existing sites, making a proportionate provision on strategic allocations and a requirement for provision on all other sites over 200 dwellings that may come forward over the plan period (provided a need is remaining at the time) and through the development of windfall sites when assessed against a criteria based policy. Plot provision will be made through making provision within the Southbourne Broad Location for Development and as part of the employment allocation south of Bognor Road and the provision of additional plots on an existing site.
	2. At the time the GTAA was updated and, notwithstanding the proposed means of provision to be included in the Local Plan outlined above, an unmet need for both pitches and plots remained. Gypsy and Traveller and Travelling Showpeople needs were discussed with neighbouring authorities at duty to cooperate liaison meetings and in December 2022, the council wrote to neighbouring authorities and those within the wider housing market areas to request their assistance in meeting some or all of the unmet pitch and plot need. The responses to this request are set out in Table 6.

**Table 6: Outcome of Duty to Cooperate December 2022 letter concerning unmet Gypsy and Traveller and Travelling Showpeople needs**

| **Authority** | **Response** |
| --- | --- |
| **Neighbouring authorities** |  |
| Arun District Council | Consulted on Regulation 18 G&T preferred approach DPD in 2020, which set out Arun was meeting own requirement for pitches and plots. Evidence of supply of pitches demonstrated would only be able to meet identified need for those meeting the planning definition of Traveller via intensification of existing sites (taking into account unimplemented consents). Site Identification Study and SA demonstrated together that there were no new sustainable G&T sites achievable in Arun. Criteria based policies should meet the needs of those that do not meet the planning definition of traveller.Only able to meet majority of needs for Traveller Showmen plots through intensification but would have small shortfall in last five years of the plan. This is likely to be accommodated within a proposed broad location included in draft DPD.In summary, unable to offer any assistance in meeting accommodation needs of Gypsy and Travellers or Travelling Showpeople. |
| East Hampshire District Council | In a similar position to CDC with a high need, and lack of suitable available sites. Undertaking a call for sites for Traveller accommodation again.   |
| Havant Borough Council | No response received |
| Horsham District Council | No response received |
| South Downs National Park Authority | Applications submitted in SDNP will be determined in accordance with Policy SD33 (Gypsies, Travellers and Travelling Showpeople) and other relevant Local Plan policies. Would welcome working with Council on any GTAA update. |
| Waverley Borough Council | Waverley are in process of reviewing Local Plan Part 1 (LPP1), which sets out strategic policies. Recognise current uncertainty Chichester and other neighbouring authorities have in meeting assessed development needs because of development constraints; Waverley is in same position. Waverley is also meeting proportion of Woking’s unmet housing need in addition to assessed needs in adopted LPP1. As such, consider will not be able to accommodate development needs from neighbouring areas in any update to LPP1 |
| **Other authorities** |  |
| Crawley Borough Council | No response received |
| Fareham Borough Council | GTAA identified need for 3 pitches and no need for plots. Only one site promoted to Council to meet needs of Gypsy and Traveller community, which has been allocated, and no sites promoted for Travelling Showpeople. As result, unable to offer assistance to CDC in meeting need. |
| Gosport Borough Council | No response received |
| Guildford Borough Council | Local Plan identifies sufficient permanent pitches/plots to meet needs of local Gypsies, Travellers and Travelling Showpeople who meet the definition set out in PPTS. However, also seek to meet identified needs of travellers within area not meeting the planning definition, and also make provision for permanent pitches to meet potential additional need of local households of unknown traveller planning status.  Have allocated sites by reviewing Green Belt and in-setting sites where appropriate.Have built in flexibility to meet any future arising local needs through requirement to provide pitches/plots on development sites of over 500 homes whilst identified need remains. However, not all the homes within strategic development sites will be delivered within Plan period, therefore not triggering the thresholds requiring the provision of pitches/plots if there remains an identified need in the borough. For these reasons do not consider that level of sites identified is, in reality, much greater than needed and there is therefore no surplus that could be considered to meet any unmet needs arising from elsewhere. |
| Lewes District Council | No response received |
| Mid Sussex District Council | Need identified by 2022 GTAA will be met through existing commitments and on-site provision on significant site allocations. Due to a shortage of available sites, Mid Sussex is unable to assist in meeting Chichester’s unmet needs. |
| Portsmouth City Council | No response received |
| Winchester City Council | Have exceeded pitch target in current local plan but shortfall for travelling showpeople. Recently completed GTAA identifies considerable current and future unmet need of 115 pitches and 27 plots. This relates only to those meeting PPTS definition of travelling and will increase if non-travelling travellers are included. No additional or acceptable traveller sites have been promoted through the SHELAA and a pitch deliverability assessment has identified only modest potential for additional pitches. Likely to be heavily reliant on windfall provision through criteria based policies in emerging local plan and therefore extremely unlikely that will be in position to help unmet need of nearby authorities. |

* 1. Since December 2022, due a number of windfall permissions for Gypsy and Traveller pitches being granted the council will, depending on the final need requirement falling within the PPTS 2023 definition, potentially be able to meet the need for gypsies and travellers. However, a shortfall in meeting the needs of travelling showpeople within the first five years of the Plan will remain, although it is expected that the need can be met over the remainder of the plan period.
	2. In respect of authorities seeking the assistance of the council in meeting their unmet Gypsy and Traveller accommodation Horsham District Council wrote to the council in November 2023 outlining their unmet need and requesting confirmation as to whether the council could assist. The council advised that given it would be challenging to meet its own high level of assessed need, it was not in a position to assist.

### *Infrastructure*

* 1. As part of preparing the Chichester Local Plan it has been necessary to understand the capacity of infrastructure and to identify whether improvements are required to support the scale and location of growth proposed by the Local Plan. The majority of engagement has been through the development of the IDP, with communication via email and meetings.

* 1. All infrastructure providers, including those relating to education and health, were contacted in May 2018 seeking views on the impact of future infrastructure needs arising from the Preferred Approach Local plan proposed development strategy: this was reflected in the IDP published alongside the Preferred Approach Local Plan. This was followed by requests in December 2020, January 2022 and October 2022 for updated information on infrastructure impacts in respect of revised development distributions and amended site allocations. The responses to the October 2022 request informed the preparation of the IDP which supported the Regulation 19 Local Plan. The IDP has subsequently been updated through the annual Infrastructure Business Plan (IBP) process.
	2. In preparing the IDP the views of neighbouring local authorities on infrastructure impacts within their administrative area has been sought. The local authorities (Horsham and Waverley) adjoining the North of the Plan Area identified the impact on health and secondary education provision as being a particular issue, were significant levels of growth to be pursed as part of the development strategy. Horsham’s Regulation 19 representation also sought assurances on the education requirements from cumulative impact of development on schools in Billingshurst.
	3. The council have worked with NHS Sussex (and before that the Sussex CCG) to identify primary health care requirements associated with the Local Plan. NHS Sussex have identified that to accommodate additional patient registrations arising from development in the southern plan area there will be a need for additional health infrastructure in Chichester, Southbourne and Tangmere. The capacity of primary health care facilities in the North of the Plan Area were discussed at a meeting in April 2022 when it was indicated that there is capacity at the Loxwood Surgery to accommodate the proposed level of development. The IDP identifies the specific health infrastructure requirements over the plan period.
	4. WSCC as the local education authority has identified the primary and secondary education requirements associated with the proposed development distribution and individual site allocations. With lower levels of growth proposed in the North of the Plan Area, no insurmountable school capacity issues have been identified. The specific requirements for each site allocation or parish number are set out in the IDP. For the purposes of school planning by WSCC, the north east of the Plan Area is within the same school planning area as that part of Horsham around Billingshurst and WSCC have advised that the small increase in housing in the North of the Plan Area could be factored into the new education provision being planned in that school planning area through the Horsham Local Plan.
	5. In response to the January 2022 IDP information request, Surrey County Council indicated that lower levels of growth would not require developer contributions towards education provision within their administrative area. This is reflected in the Regulation 19 representation which raised no issues on infrastructure capacity.

* 1. The availability of wastewater capacity has the potential to delay development and the council has worked with the Environment Agency and Southern Water to identify those wastewater treatment works where additional capacity will be required over the plan period and the options for delivering this. The catchment area for some of the treatment works also serves areas in neighbouring local authorities so there is the potential for cross boundary impacts. A Statement of Common Ground between the council, Southern Water and the Environment Agency has been agreed and signed by all parties, setting out the action proposed to be taken to address this issue.
	2. The council will continue to have dialogue with infrastructure providers and neighbouring authorities through the preparation of the annual IBP, which will update progress on delivering projects identified in the IDP.

*Water Neutrality*

* 1. The issue of water neutrality affects part of the North of the Plan Area that falls within Southern Water’s Sussex North Water Resource Zone. In September 2021, the council received a position statement from Natural England advising that it could not be concluded that extraction was not having an impact on the Arun Valley Sites (SAC, SPA and Ramsar) and that development proposals, such as new homes and commercial buildings, within the Resource Zone should not be permitted, unless water neutrality could be demonstrated.
	2. The council has worked with other affected authorities (Crawley Borough Council, Horsham District Council and the South Downs National Park) and other partners including Natural England, Environment Agency and Southern Water to address the issue. The three local authorities commissioned the preparation of a technical evidence base and development of a water neutrality mitigation strategy to address the in-combination impacts of planned development across the whole Water Resource area. This work has involved the setting up of several cross authority officer groups (see Appendix 3 for meeting dates)[[23]](#footnote-23) to take forward the technical work and development of the water mitigation strategy. The mitigation strategy was published in December 2022 and has been endorsed by Natural England. The joint working has continued with the development of a local authority/national park authority led offsetting scheme, known as the Sussex North Offsetting Water Scheme (SNOWS).
	3. A joint Water Neutrality Topic Paper (May 2023) has been prepared which sets out details of the technical evidence base and appraisal of water supply offsetting measures, which are necessary to enable water neutral new development.
	4. The water neutrality affected authorities have prepared a joint Local Plan water neutrality policy setting out significantly tighter water efficiency measures for new development and requiring offsetting of any remaining projected net increase in water use. This is included as Policy NE17 (Water Neutrality) in the Chichester Local Plan. Both Horsham District and Crawley Borough Councils have, through their responses to the Chichester Local Plan Regulation 19, expressed support for Policy NE17. Natural England’s Regulation 19 representation indicated that they were satisfied that the policy requirements are sufficient to rule out an adverse effect on site integrity of the Arun Valley Sites. Crawley Borough Council’s Local Plan was submitted for examination in July 2023. Following examination hearing sessions it has reached the stage of Main Modifications and a number of modifications to the Crawley Local plan water neutrality policy have been consulted on. Continuing the joint policy approach these modifications are reflect in the changes proposed by the Council to Policy NE17.
	5. A joint Statement of Common Ground (July 2023), which sets out further details regarding the cooperation and joint work to resolve this strategic issue has been agreed by all affected local authorities and endorsed by the Environment Agency, Natural England and Southern Water.

*Nutrient Neutrality*

* 1. Parts of the Plan Area are affected by a requirement for nutrient neutrality to protect the designated Chichester and Langstone Harbour SPA/Ramsar, part of the wider nitrate vulnerable Solent catchment area. Since 2019, the council has been working with other affected authorities across the Solent through the Partnership for South Hampshire (PfSH) Water Quality Group (recently renamed the PfSH Natural Environment Group) which meets regularly. The council contribute towards a shared officer resource based at Fareham Borough Council to lead on mitigation schemes across the Solent. A bid to the Local Nutrient Mitigation Fund Round 2 has been prepared jointly, which includes projects to mitigate development in the Chichester Plan Area. Policy NE19 of the plan covers nutrient neutrality and has been discussed and agreed with Natural England.

*Flood Management*

* 1. Parts of the Plan Area will be at increased risk from coastal erosion, groundwater, fluvial and/or tidal flooding in future due to increased severe rainfall, sea level rise and storm surges. Working with the Environment Agency and WSCC, as the Lead Local Flood Authority, is required to assure the risks of flooding are appropriately assessed and addressed in the Local Plan through the location of development and formulation of policies.
	2. In December 2018, the council published a Strategic Flood Risk Assessment (Level 1) (SFRA), with updates in April 2021 and December 2022. An interim Level 2 SFRA was also published in December 2022. The purpose of the SFRA is to provide information and guidance on flood risk across the Plan Area from all sources. The council has worked with the Environment Agency, WSCC and other bodies, including neighbouring authorities, in the preparation of the SFRA. There were no representations at Regulation 19 from any bodies concerned with flood management regarding the council’s approach to this in the Local Plan.

*Natural Environment*

* 1. Within the Plan Area there are a number of internationally important habitats sites designated for their ecological importance. New development can have a negative impact on habitats sites due to the recreational impact of residents visiting these sites. The council is one of 19 partners in the Solent Recreation Mitigation Partnership. The partnership has developed a programme of avoidance and mitigation measures sufficient to avoid an adverse effect on the integrity of habitats sites[[24]](#footnote-24). This is funded from developer contributions from new residential development within 5.6km of the site.
	2. The council have also worked in partnership with Arun District Council to develop a Strategic Scheme of Access Management and Mitigation to address the recreational impacts from new residential development on the Pagham Harbour Special Protection Area. This is also funded via developer contributions.
	3. Natural England commented on the Preferred Approach Local Plan and raised concern that the proposed policy on wastewater management and water quality would not ensure that an adverse effect on the Chichester Harbour SPA/SCA/Ramsar would be avoided. The council sought to address this through redrafting of the relevant policies and Natural England were provided with an informal opportunity to comment on relevant emerging Local Plan policies for inclusion in the Regulation 19 Local Plan. Natural England’s representation to the Regulation 19 Local Plan emphasised that they did not find the Local Plan unsound on any grounds relating to their remit. They did, however, suggest a number of amendments or additions to both policies and supporting text in order to make the Local plan stronger and more coherent in delivering for the natural environment. The council and Natural England have worked closely to discuss and agree how the Local Plan could be changed to address the issues raised. The proposed changes are set out in Appendix 2 and a separate Statement of Common Ground is being prepared with Natural England.

*Air Quality*

* 1. Natural England provided comments on the HRA of the Regulation 19 Chichester Local in May 2023. Whilst largely satisfied with the conclusions of the HRA, Natural England advised that further work in respect of a number of sites and impact pathways was required.
	2. The two main areas of concern were atmospheric pollution in the northern part of the plan area and potential impacts from development on functionally linked land around the Solent. In the case of the latter, the council are agreeable to amending the wording of Policies A12 and A13 to better reflect the mitigation hierarchy, as advised by Natural England. In respect of atmospheric pollution, Natural England commented that they did not agree with many of the arguments used to support the conclusion of no Adverse Effect on the Integrity (AEOI) of five Special Areas for Conservation (SACs) adjacent or outside the Chichester Local Plan Area, and further evidence was needed to support the conclusion.
	3. The council met with Natural England on several occasions to discuss this issue and has worked with its transport and HRA consultants to examine the air quality data in more detail with a view to establishing a clearer position on potential impacts of proposed development on the SACs. Natural England subsequently confirmed (February 2024) that their outstanding concerns related to the potential increase in ammonia emissions from transport and the impact on The Mens SAC.
	4. In January 2024, Horsham DC published the Horsham Local Plan 2023 – 2040 under Regulation 19. This was accompanied by an HRA to which Natural England raised similar concerns through representations made to the Regulation 19 Local Plan consultation regarding the impact of atmospheric ammonia levels on The Mens SAC.
	5. Additional modelling of the impacts is ongoing and the council, together with Horsham DC, continue to explore with Natural England potential mitigation measures to address this issue, which is considered resolvable through the Local Plan examination process. It is expected this will be outlined in an update to the Statement of Common Ground with Natural England.
1. **Conclusion**
	1. This statement demonstrates how Chichester District Council has worked closely with West Sussex County Council, neighbouring authorities, statutory agencies and other duty to cooperate bodies to address the strategic cross boundary issues identified in preparing the Chichester Local Plan 2021 – 2039.
	2. It is considered that the council has a positive record throughout the preparation of the Local Plan of cooperation. The council has undertaken collaborative working on joint evidence base studies (where appropriate), ongoing engagement with infrastructure providers through the IDP and discussions with neighbouring authorities and others on the identified strategic issues. The outcomes of this engagement has shaped and informed the development of the Local Plan.
	3. The council recognises that the Duty to Cooperate is an ongoing requirement and will continue to engage with neighbouring authorities and other bodies through the delivery of the Local Plan and the development of their own plans and strategies. The council will publish addendum reports or additional/updated Statements of Common Ground as required to reflect further progress.

# Appendix 1: Record of engagement with Duty to Cooperate Bodies

| **DtC Body** | **How engaged** | **When engaged** | **What issues engaged** | **Why engaged** | **Summary of key outcomes/current position** |
| --- | --- | --- | --- | --- | --- |
| **Neighbouring Planning Authorities** |
| **Arun District Council (ADC)** |  |  |  |  |  |
|  | Multi organisation officer meeting (ADC, CDC, WSCC) | 13 September 2016 | Update of LP progress, transport impacts, wastewater, infrastructure provision | DtC liaison meeting to review progress and share information | Transport – modelling for ADC’s transport study has identified capacity issues at Bognor Road roundabout. CDC Adopted Local Plan identifies mitigation measures for this roundabout. To be considered again following further work on ADC’s transport study.Wastewater – CDC to share brief for Wastewater Treatment StudyInfrastructure – potential need for new secondary school in Arun. May need to review secondary capacity as part of CDC Local Plan review. |
|  | CDC Issues and Options | June – August 2017 |  | Statutory consultee | Highlighted role of Strategic Planning Board in considering cross boundary issues; impact of strategy options on Arun services and infrastructure; need for cross boundary impacts of traffic to be considered and approach to A27 improvements. |
|  | Officer meeting | 31 January 2018 | Update of LP progress, LSS3, A27, SoCG | DtC liaison meeting to review progress and share information | No meeting note |
|  | Evidence input/feedback | May 2018 | Infrastructure provision (preparation of IDP to support Local Plan) | To take account of any cross boundary issues | ADC did not respond with comments |
|  | Joint evidence base study (Adur, ADC, CDC, Worthing) | October 2018 | Gypsy and Traveller and Travelling Showpeople Accommodation Needs | Joint evidence study for four West Sussex coastal authorities | Pitch and plot needs identified for each local authority area |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | Conditional support given by ADC to the Plan, subject to a series of actions:* CDC considering whether more can be done in Chichester District to address unmet need from within West Sussex and Greater Brighton area
* further research being undertaken re justification for potential imbalance between households and jobs with potential consequences for commuting on congested road network
* further clarification and cooperation on the potential mitigation for resolving infrastructure pressures
 |
|  | Officer meeting | 18 November 2019 | Update of LP progressDiscussion of: housing requirements, supply and unmet need; affordable housing; employment; transport; nitrates; other strategic issues; preparation of SoCG | DtC liaison meeting to review progress and share information | No CDC unmet G&T need to be accommodatedADC encourage CDC to review HELAA to consider capacity of CDC plan area to meet wider unmet housing needsADC meeting unmet employment need from the FEMA, Adur and Worthing and possibly Chichester, may have deliverability issues, especially with regards to LEC site but not looking for help with employment land.Consider joint meetings with WSCC/NH over A27 work |
|  | Evidence input/feedback | December 2020 | Revised development distribution and IDP update | To take account of any cross boundary issues | Cross boundary issues identified, particularly in relation to the impact of growth to the east of Chichester on the SRN. Requirement to maintain officer level liaison to ensure transport modelling and proposed mitigation reflect the requirements of both districts. Other cross boundary issues noted in relation to active travel, education, healthcare provision, leisure facilities, landscape, the cumulative impact of development on Pagham harbour, flooding, waste transfer station upgrades, wastewater and renewable energy. |
|  | Memorandum of Understanding | January 2020 | Housing and affordable housingTransportNitratesEmploymentGypsy and traveller sites | DtC cross boundary issues | Details current position on identified issues and areas for continued joint working (A27 impacts/mitigation with WSCC and HE) |
|  | Officer meeting | 26 January 2021 | Transport evidence and development impacts | Cross boundary issue in respect of A27 | Information sharing on transport modelling inputs and existing CDC mitigation package |
|  | Technical consultation | July – September 2021 | Strategic Wildlife Corridors new/changes to proposed routes | Adjoining authority | ADC did not respond |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | Neighbouring authority | ADC to undertake further work on A27 constraints. ADC unable to confirm if able to accommodate unmet need from neighbouring authorities |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP updated | To take account of any cross boundary issues | Clarification sought by ADC of impact of infrastructure constrained approach on net commuting, the cross boundary mitigations previously acknowledged as being required within Arun, specifically the A259, and whether the evidence base (HEDNA) will be updated to consider implications for meeting unmet need, housing affordability. |
|  | Officer meeting (ADC, CDC, WSCC, NH) | 31 March 2022 | Transport matters relating to A27 and A259 | Cross boundary transport issues | No meeting note |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP updated | To take account of any cross boundary issues | ADC did not respond |
|  | Officer meeting | 28 October 2022 | Update of LP progress, Discussion of: unmet housing need, employment; transport; other strategic issues | DtC liaison meeting to review progress and share information | CDC to share and confirm transport work outputs; ADC unable to confirm if able to accommodate any of CDC’s unmet housing need; agreement to progress SoCG |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller needs | Neighbouring authority | No response |
|  | Email | 4 October 2023 | Request for comments on Arun Local Plan SA/SEA Scoping Report |  | CDC have no issues with proposed SA framework. Minor factual point regarding number of AQMAs. |
|  | Officer meeting (Teams) | 23 October 2023 | Update of LP progress, discussion of ADC response to CDC Reg19 Local Plan, SoCG progress | DtC liaison meeting and next steps in preparing SoCG | CDC to update SoCG following discussions with NH on outstanding transport issues |
|  | Officer meeting (Teams) | 10 January 2024 | Update on CDC Local Plan transport evidence | DtC liaison meeting | CDC have been working through number of issues with National Highways related to age of transport model and required mitigation. NH position is that cannot commit to Fishbourne and Bognor junction improvements, mitigation package to be determined through Monitor and Manage process and updated transport model.ADC concerns remain but to arrange meeting with NH to understand how approach changed.ADC to provide details of S106 contributions collected and flexibility in use. |
|  | Workshop - Arun Local Plan Issues and Options – Direction of Travel | 17 January 2024 | Discussion of key themes to be addressed by Arun Local Plan | To identify any cross boundary issues |  |
|  | Response to Arun Gypsy and Traveller DPD (Regulation 19) | February 2024 | Gypsy and Traveller and Travelling Showpeople accommodation needs | CDC statutory consultee | Support continued preparation of DPD.Suggest that Memorandum of Understanding (MoU) be updated as current MoU, which is referenced in DPD, dates from 2020 and is now out of date.Evidence based on PPTS 2015 definition of traveller and unclear how this evidence can be used to establish level of need on basis of more recent definition of traveller in PPTS 2023. |
|  | Transport Infrastructure Management Group (with National Highways and WSCC) | 10 April 2024 | See National Highways entry | See National Highways entry | See National Highways entry |
| **Horsham District Council (HDC)** |  |  |  |  |  |
|  | Evidence input/feedback | May 2018 | Infrastructure provision (preparation of IDP to support Local Plan) | To take account of any cross boundary issues | HDC did not respond. |
|  | Officer meeting | 17 December 2019 | Update of LP progressDiscussion of: housing requirements, supply and unmet need; employment; transport; other strategic issues; preparation of SoCG | DtC liaison meeting to review progress and share information | HDC intend to meet own housing needNo need for either authority to accommodate unmet employment or G& T needNo cross boundary transport implications |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | HDC has reservations about reliance on neighbourhood planning to deliver extent of housing currently identified and further evidence to justify delivery within timescales is needed. Support emphasis placed on work of the WS&GB Strategic Planning Board to address longer term and unmet development needs through an accelerated work programme of LSS3. General support to approach to meeting travelling communities’ needs and employment land provision.  |
|  | Memorandum of Understanding | January 2020 | HousingTransportEmploymentGreen infrastructureGypsy and traveller requirements | DtC cross boundary issues | Agreement that no unmet housing, employment or gypsy and traveller needs to be accommodated by either authority.Continued liaison on wildlife corridors and transport assessments. |
|  | Response to HDC Regulation 18 consultation | February – March 2020 | Scale of development | CDC statutory consultee | CDC encourage HDC to consider potential to meet wider unmet housing needs |
|  | Evidence input/feedback | December 2020 | Revised development distribution and IDP update | To take account of any cross boundary issues | No cross boundary issues identified |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | Neighbouring authority | HDC unlikely to be able accommodate unmet needs – priority to those authorities that have direct relationship in housing market terms |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update | To take account of any cross boundary issues | If development in north of plan area is progressed HDC would want to see cumulative impact on junctions in Horsham assessed and necessary mitigation identified in CDC Transport Assessment.Understand with relevant parties impact of development and necessary mitigation on access to rail services, health and education provision, community facilities and wastewater. |
|  | Officer meeting | 14 June 2022 | Update on CDC housing distributionInfrastructure impacts | DtC liaison meeting to review progress and share information | CDC to have further discussion with WSCC on education/transportFurther meeting to be arranged |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP updated | To take account of any cross boundary issues | Concern about impact of development in northern plan area on road junctions, infrastructure and services within Horsham district |
|  | Officer meeting | 13 December 2022 | Update of LP progress, Discussion of: unmet housing and Gypsy and Traveller needs, water neutrality, infrastructure impacts | DtC liaison meeting to review progress and share information | Agreement to progress SoCG |
|  | Letter | 14 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | Neighbouring authority | Pause to Local Plan was maintained in July 2022 so Arun is not in a position to confirm whether any unmet need arising from neighbouring authorities can be accommodated.Consulted on Regulation 18 preferred approach DPD in 2020, which set out Arun was meeting own requirement for pitches and plots but Limited availability of sites. Unable to offer any assistance in meeting accommodation needs of Gypsy and Travellers or Travelling Showpeople. |
|  | Officer meeting (Teams) | 2 May 2023 | Update of LP progress, discussion of HDC response to CDC Reg19 Local Plan, SoCG progress | DtC liaison meeting and next steps in preparing SoCG | CDC to provide further information to HDC to address issues raised in Reg19 representation. Agreement to progress/update SoCG |
|  | Officer meeting (Teams)  | 12 September 2023 | Update of LP progress, discussion of issues related to publication of HDC Regulation 19 Local Plan in early 2024, preparation of SoCG | DtC liaison meeting and next steps in preparing SoCG | HDC intend to write to adjoining authorities regarding unmet housing and G&T need. Continued liaison (and with WSCC) on education capacity and possible air quality impacts on Mens SAC arising from cumulative development impacts (HRA).Updated transport assessment for CDC northern plan area confirmed no significant traffic impacts on roads/junctions in neighbouring authorities arising from preferred development distribution.CDC to revise draft SoCG. |
|  | Letter (officer) | 24 November 2023 | Request for CDC to confirm if able to assist in addressing HDC’s unmet housing need and Gypsy and Traveller accommodation needs. | Horsham approach under DtC | CDC advised unable to assist as have own unmet housing and G&T need. If were able to take unmet housing need would first look to assist South Downs National Park Authority. |
|  | Response to Horsham Local Plan (Regulation 19) | 27 February 2024 | HousingWater Neutrality | CDC statutory consultee | Acknowledge position on accommodating unmet housing needs of neighbouring authorities. Support for water neutrality policy. |
|  | Meeting with SE Regional Director of Natural England (James Seymour), specialist Natural England officers, HDC and CDC officers  | 8 March 2024 | Follow up on HRA and air quality issue related to The Mens SAC |  | Agreed actions for further technical work required |
|  | Officer meeting | 29 April 2024 | Air quality | Cross boundary issue | Update on technical work |
| **Waverley Borough Council (WBC)** |  |  |  |  |  |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | WBC have no major concerns, wishing only to ensure that the housing target for Chichester can be accommodated without the need of assistance from WBC. |
|  | Officer meeting | 12 December 2019 | Update of LP progressDiscussion of: housing requirements, supply and unmet need; employment; transport; other strategic issues; preparation of SoCG | DtC liaison meeting to review progress and share information | WBC not looking to CDC to meet any unmet housing needNo requirement from either authority to accommodate unmet employment needNo significant cross boundary implications due to location of major roads in relation to large settlementsNo requirement to accommodate any unmet G&T need |
|  | Evidence input/feedback | December 2020 | Revised development distribution and IDP update | To take account of any cross boundary issues | No response received |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | Neighbouring authority | WBC unlikely to be able accommodate unmet needs – constraints within Borough |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update | To take account of any cross boundary issues | Concern about impact of development in northern plan area on Waverley district |
|  | Officer meeting | 25 March 2022 | Revised development distribution and IDP | DtC liaison meeting to review progress and share information | WBC keen to understand how commitments in WBC have been handled in transport modellingFurther meeting following revised transport modellingCross boundary issues identifiedCDC to draft SoCG |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP updated | To take account of any cross boundary issues | Concern about transport impacts of development in northern plan area and on infrastructure/services |
|  | Letter | 1 November 2022 | Request from WBC to advise of any strategic issues need to consider when deciding whether to update LP Part 1 | To take account of any cross boundary issues | CDC advised should consider how could assist in accommodating unmet housing needs of neighbouring authorities; cross boundary infrastructure impacts. |
|  | Officer meeting | 7 December 2022 | Update of LP progressDiscussion of: unmet housing need; transport; water neutrality; wastewater; habitats sites; infrastructure; preparation of SoCG | DtC liaison meeting to review progress and share information | CDC to share transport assessment; opportunities for cross boundary use of CIL to be considered; agreement to progress SoCG |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | Neighbouring authority | Waverley in similar position to other authorities in meeting assessed development needs because of development constraints. Also meeting proportion of Woking’s unmet housing need in addition to assessed needs in adopted LPP1. As such, consider will not be able to accommodate development needs from neighbouring areas in any update to LPP1 |
|  |  | March 2024 | Waverley Gypsy and Traveller/Travelling Showpeople Accommodation | Information request in relation to preparation of GTAA |  |
| **East Hampshire District Council (EHDC)** |  |  |  |  |  |
|  | Email | 4 May 2018 | Housing and employment needs assessment for East Hants | Response to technical consultation | Agreement to share findings from evidence studies and keep under review need for joint studies |
|  | Evidence input/feedback | May 2018 | Infrastructure provision (preparation of IDP to support Local Plan) | To take account of any cross boundary issues | No additional infrastructure needs identified at time but kept under review as EH LP progresses |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | No comments, although recognition that both authorities face similar issues in respect of planning for housing for those parts of the districts within the South Downs National Park |
|  | Response to East Hants Regulation 18 and Large Sites consultation | 14 March 2019 | Response to consultation on East Hants draft Local Plan | CDC statutory consultee | Continued working on cross boundary issuesIn response to Large Sites consultation, CDC provided comments on potential transport impacts of two site and how consideration should be given to understanding the transport impacts of the cumulative impact of the large development sites on A3(M) junction 2 and vehicular pollution on nearby Special Areas of Conservation. |
|  | Officer meeting | 19 November 2019 | Update of LP progressDiscussion of: housing requirements, supply and unmet need; affordable housing; employment; transport; other cross boundary issues; preparation of SoCG | DtC liaison meeting to review progress and share information | To share information on housing need and transport to ensure any cross boundary issues are picked up at early stageNo cross boundary employment issues |
|  | Evidence input/feedback | December 2020 | Revised development distribution and IDP update | To take account of any cross boundary issues | No cross boundary issues identified |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | Neighbouring authority | Meeting to be arranged to discuss (see February and May 2022 meetings below) |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update | To take account of any cross boundary issues | No response received |
|  | Officer meeting | 14 February 2022 | Update on LP progress, housing need evidence, SA progress | DtC liaison meeting to review progress and share information | Sharing of information on unmet needs, strategic and local constraintsFurther meeting to discuss SA reasonable alternativesFurther discussion regarding unmet housing need following transport modellingFurther discussion re SoCG and G&T accommodation |
|  | Officer meeting | 3 May 2022 | Update on housing need, constraints and opportunities in East Hants to inform RA, strategic relationships | DtC liaison meeting to review progress and share information | Evidence sharing to continueCDC to draft SoCGFurther discussion on G&T needs |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP updated | To take account of any cross boundary issues | No response received |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | Neighbouring authority | Currently consulting at Reg18 stage and at early stages of considering key priorities. Too early in process to identify any capacity to meet others unmet needs.In a similar position to CDC with a high pitch need, and lack of suitable available sites. Currently undertaking a further call for sites for Traveller accommodation. |
|  | Email | 18 August 2023 | Gypsy and Traveller/Travelling Showpeople Accommodation | Request from EHDC to CDC to consider whether able to assist in meeting need identified in EHDC GTAA | CDC responded (30/08/23) that CDC had also identified a high level of need for both Gypsy and Travellers and also for Travelling Showpeople. As such, not currently in position to accommodate the needs of any neighbouring authorities, CDC itself has made requests of other neighbouring authorities in this regard, none of whom have been able to assist.  |
|  | Statement of Common Ground | January 2024 | Housing NeedGypsy and Traveller ProvisionTransport impactsNitrate Neutrality | DtC cross boundary issues | Sets out agreed position on identified issues and agreement to continue discussions regarding unmet housing and gypsy and traveller needs. |
|  | Response to East Hants draft Local Plan (Regulation 18) | 27 February 2024 | Housing | CDC statutory consultee | Support acknowledgement in draft Local Plan of potential to accommodate unmet housing needs of neighbouring authorities. |
| **Havant Borough Council (HBC)** |  |  |  |  |    |
|  | Officer meeting | 8 June 2016 | Update on Local Plan progress; update on sub-regional work; housing need | DtC liaison meeting to review progress and share information | Ongoing engagement as both local plans are progressed |
|  | Portfolio holder and officer meeting | 31 July 2017 | Update on Local Plan progress and evidence base; update on sub-regional work | DtC liaison meeting to review progress and share information | CDC to share information on Thornham wastewater treatment strategy |
|  | Portfolio holder and officer meeting | 22 January 2018 | Update on Local Plan progress and evidence base; update on sub-regional work | DtC liaison meeting to review progress and share information |  |
|  | Evidence input/feedback | May 2018 | Infrastructure provision (preparation of IDP to support Local Plan) | To take account of any cross boundary issues | Need to also include A259, need for review of capacity at Thornham WwTW, primary health care capacity to serve strategic development at Southbourne. |
|  | Multi organisation meeting (Havant, Chichester, West Sussex CC, Hampshire CC, Highways England) | 7 June 2018 | Transport implications of delivering increased housing requirements in Havant and Chichester | Cross boundary impacts of development on highways | Havant and CDC to share assumptions for and outputs from transport modelling workContinued engagement |
|  | Response to Havant Regulation 19 consultation | 14 March 2019 | Housing needs; transport impacts; international sites | CDC statutory consultee | No objection in principle to Havant LP.Clarification sought on assumptions used in Havant transport and wastewater evidence on cross boundary planned developmentModifications to Havant LP Ecological Network policy |
|  | Officer meeting | 3 December 2019 | Update of LP progressDiscussion of: housing requirements, supply and unmet need; employment; transport; nitrates; other strategic issues; preparation of SoCG | DtC liaison meeting to review progress and share information | No cross boundary requirement to accommodate unmet housing need from CDC or HBC. HBC Housing Market Area covers area to west of HBC and HBC accommodating some of Portsmouth Housing Market Area unmet need.No requirement to accommodate any unmet employment need arising from within HBC. HBC may be able to accommodate unmet employment need arising from CDC. Ongoing discussions required to assess whether there is a requirement from CDC and whether HBC can accommodate this.HBC may have headroom in their nitrates mitigation scheme that CDC could make use of.  HBC are unlikely to know the answer until Feb / March time, but discussions are ongoing.  HBC and CDC to ensure Local Plan Transport assessments are finalised using a shared understanding of current and planned development. |
|  | Officer meeting | 23 September 2020 | Nitrates; wastewater; SoCG preparation | DtC liaison meeting to review progress and share information | No spare capacity at HBC Warblington Farm nitrate mitigation scheme to sell credits to developers in CDC areaCapacity issue at Thornham WwTW – potential for development in Emsworth to be redirected. CDC/HBC to work with EA/SW to inform SW Business PlanWarblington Junction upgrade may require S106 contributions from CDC. HBC to provide more information on costs |
|  | Evidence input/feedback | December 2020 | Revised development distribution and IDP update | To take account of any cross boundary issues | No response received |
|  | Statement of Common Ground | February 2021 | Housing requirements and distributionTransportNutrient neutralityWastewater treatmentEmploymentSites of International Importance and Wildlife Corridors |  | Agreement that no unmet housing or employment needs to be accommodated by either authority.Nitrates – both Councils part of wider joint working pursing a Solent wide solutionWastewater – both Councils committed to working together with Southern Water to find solution for additional wastewater capacityTransport – HBC modelling indicates that forecast changes in flow on West Sussex network together with HBC mitigation package not likely to result in severe residual impact |
|  | Technical consultation | July – September 2021 | Strategic Wildlife Corridors new/changes to proposed routes | Adjoining authority | No response |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | Neighbouring authority | No specific comments |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update | To take account of any cross boundary issues | HBC withdrawing current local plan and commencing new review. Anticipated transport and wastewater will remain key cross boundary issues together and potentially nature conservation (wildlife corridors, GI). |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP updated | To take account of any cross boundary issues | No cross boundary issues identified |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | Neighbouring authority | No response |
|  | Officer meeting | 24 January 2022 | Update of LP progressDiscussion of: unmet housing need; employment; transport; nitrates; wastewater; Gypsy and Traveller provision; wildlife corridors; preparation of updated SoCG | DtC liaison meeting to review progress and share information | Agreement to progress updating of SoCG to cover issues discussed |
|  | Email | 10 July 2023 | Gypsy and Traveller/Travelling Showpeople Accommodation | Information request from ORS (on behalf of HBC) in relation to preparation of GTAA |  |
|  | Officer meeting (Teams) | 24 October 2023 | Update on Local Plans (including plan periods), Havant draft Constraints Study, update on housing need and supply, Gypsies & Travellers | DtC liaison meeting | HBC to provide copy of Constraints Study to CDC for comment.HBC intend to write to neighbouring authorities regarding unmet housing need. No unmet Gypsy and Traveller need.CDC to update draft SoCG. |
|  | Email | 8 November 2023 | Request for CDC to provide information on relevant infrastructure issues to inform update of Havant IDP | To identify any cross boundary infrastructure issues | CDC highlighted the following cross boundary infrastructure:A27 capacity; A259 – opportunities to extend ChEm route improvements from Emsworth to Havant; education – capacity of secondary and primary education at Southbourne; flood defences;wastewater infrastructure – Thornham probably require additional capacity, reinforcement of sewerage network; water supply – Havant Thicketcontinuity of bus services 700 Coastliner service – use of Chichester CIL to provide Real Time Passenger Information Displays to encourage modal switch; primary care – expansion of Southbourne GP provision |
|  | Letter (officer) | 5 March 2024 | Request for CDC to confirm if able to assist in addressing HBC’s unmet housing need.Request that in event shown through Chichester LP examination there is additional capacity to accommodate housing, HBC’s unmet need is addressed. | Havant approach under DtC | Response confirms CDC unable to assist whilst unable to meet own need, or element of SDNP unmet need related to Chichester District. |
|  | Officer meeting (Teams) | 2 April 2024 | Discussion of issues covered by draft SoCG, particularly housing need and transport. Also discussed wastewater treatment at Thornham. | DtC liaison meeting | CDC to consider HBC suggested rewording on housing need, employment and wastewater. CDC to add further reference to Technical Note findings regarding transport impacts on A259. HBC draft GTAA study found no net additional need. |
|  | Officer meeting (Teams) | 1 May 2024 | Finalising SoCG wording | DtC liaison meeting | Final changes to wording agreed. |
|  | Statement of Common Ground | 2 May 2024 | Housing need and distributionTransport EmploymentNutrient NeutralityWastewater TreatmentWildlife corridorsSites of International importanceGypsy and Travellers | DtC cross boundary issues | Sets out agreed position on identified issues and agreement to continue discussions regarding cross boundary transport issues, unmet housing and gypsy and traveller needs. |
| **South Downs National Park Authority (SDNPA)** |  |  |  |  |  |
|  | CDC Issues and Options | June – August 2017 |  | Statutory consultee | Consideration of potential impacts on National Park and its setting; role of National Park in providing accessible natural greenspace; ability of Chichester Plan Area to accommodate unmet needs arising from National Park |
|  | Letter | 21 February 2018 | SDNP unmet housing need | Formal request from SDNPA for CDC to consider through LPR accommodating some or all of the SDNP unmet housing need | Decision of CDC Full Council (06/03/18) to agree, subject to completion of LPR evidence base and assessment of sites, to accommodate unmet housing needs of approximately 44 dpa arising from that part of the National Park within Chichester district |
|  | Member and officer meeting | 13 March 2018 | Accommodating SDNP unmet housing need; local plan progress; SoCG preparation | DtC liaison meeting to review progress and share information | No meeting note |
|  | Statement of Common Ground | April 2018 | SDNP unmet housing need | DtC | Articulates formal request and CDC decision regarding accommodating some or all of the unmet housing needs arising from the part of the National Park within Chichester District via the Chichester Local Plan Review. |
|  | Evidence input/feedback | May 2018 | Infrastructure provision (preparation of IDP to support Local Plan) | To take account of any cross boundary issues | Identification of cross boundary issues to be referenced in IDP including A27, walking/cycling/ education |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | SDNPA welcomes provisions made in the Plan to ensuring that there would be no adverse impact on the openness of views and setting of the SDNP, including the important relationship between SDNP and Chichester Harbour. Suggests minor policy wording to site allocation policies in A259 corridor to ensure adverse impacts on SDNP are minimised, with opportunities to enhance areas secured. Supports provision of strategic wildlife corridors but notes no corresponding policy in the South Downs Local Plan and queries whether they are substantial enough to perform intended function. Broad support for level of development proposed in Plan. Representations also made on improving transport links into SDNP and ensuring that transport study has taken account of SDNPA’s transport study findings re Midhurst.  |
|  | Officer meeting | 15 November 2019 | Update of LP progressDiscussion of: housing requirements, supply and unmet need; affordable housing; employment; transport; nitrates; landscape gaps/wildlife corridors; other strategic issues; preparation of SoCG | DtC liaison meeting to review progress and share information | SDNPA to provide updated housing figures.SDNPA confirmed no capacity to accommodate horticultural needsCDC to clarify impact on A286 to Midhurst in Local Plan transport assessment.Further discussion on areas affected by nitrates, SDNPA to provide details of which WwTW development will discharge toSDNPA and CDC agreed landscape gaps/wildlife corridors strategic matter. Detail to be agreed through neighbourhood plans with wider principles to be agreedCDC to prepare draft SoCG. |
|  | Officer meeting | 10 December 2019 |  | DtC liaison meeting to review progress and share information | No agenda/meeting note |
|  | Memorandum of Understanding | January 2020 | HousingEmploymentTransport infrastructureNitratesLandscape gaps/wildlife corridors |  | Record of discussions and agreement (as outlined in meetings noted above) |
|  | Evidence input/feedback | December 2020 | Revised development distribution and IDP update | To take account of any cross boundary issues | Transport impacts on A286 to Midhurst and mitigation required |
|  | Technical consultation | July – September 2021 | Strategic Wildlife Corridors new/changes to proposed routes | Adjoining authority  | Comments on route functionality |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | Neighbouring authority | No response |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update | To take account of any cross boundary issues | Transport impacts on A286 to Midhurst and mitigation |
|  | Officer meeting | 25 March 2022 | Update of LP progress; development distribution in CDC plan areas; cross boundary infrastructure; housing need  | DtC liaison meeting to review progress and share information | SDNPA likely to raise concern over transport and air quality impacts if significant development were to be proposed for northern area plan areaSDNPA likely to maintain comments made to Preferred Approach LP concerning: functional width of SWC; impact on setting of National Park; impacts on links between National Park and Chichester Harbour AONB require high quality designIssues to be covered by SoCG: transport impacts; air quality impacts; wildlife corridors/GI; setting of protected landscapes; housing needCDC confirmed no longer able to accommodate some of SDNP unmet need due to A27 capacity  |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP updated | To take account of any cross boundary issues | No comments made |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | Neighbouring authority | Given National Park has highest status of protection in relation to landscape and scenic beauty and that scale and extent of development within designated areas should be limited, unlikely will be able to accommodate any need arising in District outside National Park.  |
|  | Officer meeting (Teams) | 10 May 2023 | Update of LP progress, discussion of SDNPA response to CDC Reg19 Local Plan, nitrate neutrality, GI, self-build, preparation of SoCG | DtC liaison meeting and next steps in preparing SoCG | CDC to look at potential for Plan modifications to address issues raised in Reg19 representation.Agreement to progress draft SoCG |
|  | Officer meeting (Teams) | 12 July 2023 | Update of LP progress, progress on CDC consideration of SDNPA Reg19 representations, draft SoCG | DtC liaison meeting and next steps in preparing SoCG | CDC to provide follow up comments on landscape issues. SDNPA to provide comments on draft SoCG. |
|  | Officer meeting (Teams)  | 2 October 2023 | Update of LP progress, progress on CDC consideration of SDNPA Reg19 representations, draft SoCG | DtC liaison meeting and next steps in preparing SoCG | CDC to advise SDNPA on outcome of discussions with Natural England regarding air quality impacts on The Mens (HRA issue).CDC outlined proposed response to Reg19 reps. To include in updated SoCG for SDNPA comment.SDNP HEDNA update nearing completion with findings to be shared with LPAs at workshop in November. |
| **County Council** |
| **West Sussex County Council (WSCC)** |  |  |  |  |  |
|  | Officer meeting | 15 December 201712 January 201822 November 2018 | Technical input into CDC Transport Study/Modelling | Technical consultee | Suggested revisions to brief |
|  | CDC Issues and Options | June – August 2017 |  | Statutory consultee | Highlighted areas for further consideration in development of plan |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | Suggested amendments to policies and updated information of development impacts on infrastructure provision, particularly education |
|  | Officer meeting | 20 December 2019 | General update | DtC liaison meeting to review progress and share information | No specific outcomes |
|  | Statement of Common Ground (WSCC and local authorities in West Sussex) | April 2020 | Minerals PlanningWaste Planning Waste DisposalEducation Highways, including Public Rights of WayFlood ManagementLibrary ServicePublic Health ServiceOlder Persons Provision Fire and Rescue Service |  | Covers (in a general sense) the various roles and functions of the County Council and the joint working arrangements. It does not cover specific agreements for County interests or initiatives in Chichester, such as the A27 or land promotion. |
|  | Evidence input/feedback | December 2020 | Infrastructure implications of revised development distribution | To take account of development impacts on infrastructure | WSCC identify school planning areas where there is insufficient primary capacity to accommodate level of development proposed and will require provision to be made.Number of sites within minerals safeguarding areas or minerals consultation area, meaning criteria set out in Policy M9 of the West Sussex Joint Minerals Local Plan (2018) must be met.  |
|  | Multi organisation officer meeting (CDC, WSCC, NH, Homes England) | 30 June 2021 | Strategic transport and infrastructure funding | Highway authorities/funding bodies | Agreed that mitigation package could not be funded by developer contributions alone.Homes England advised that no appropriate external funding pot available and no certainty of any future appropriate funding source.Highways England advised no certainty that national scheme will be forthcoming and nor could it be assumed that it would provide capacity of itself to support future development.Highway authorities willing to consider phased incremental improvements based on revised work Stantec had carried out, whilst recognising that these works may not be able to be delivered financially over the plan period. CDC to carry out some further work on putting a proposal together for an alternative approach.  |
|  | Technical consultation | July – September 2021 | Strategic Wildlife Corridors new/changes to proposed routes | Technical consultee | No response |
|  | Evidence input/feedback | January 2022 | Infrastructure implications of revised development distribution | To take account of development impacts on infrastructure | WSCC identify school planning areas where there is insufficient primary capacity to accommodate level of development proposed and will require provision to be made.Number of sites within minerals safeguarding areas or minerals consultation area, meaning criteria set out in Policy M9 of the West Sussex Joint Minerals Local Plan (2018) must be met. Site specific transport requirements identified. |
|  | Officer meeting (ADC, CDC, WSCC, NH) | 31 March 2022 | Transport matters relating to A27 and A259 | Cross boundary transport issues | No meeting note |
|  | Meeting between CDC officers, consultants and relevant technical specialists representing the Local Lead Flood Authority (LLFA) (part of WSCC). | 13 May 2022 | Strategic Flood Risk Assessment - Sequential Test Methodology | Technical consultee | The LLFA set out recommendations for how to proceed with the further development of the Sequential Test Methodology. The main issues considered were how to incorporate surface and groundwater into the process.  |
|  | Meeting between CDC officers, consultants and relevant technical specialists representing the LLFA (part of WSCC). | 17 August 2022 | Strategic Flood Risk Assessment - Sequential Test Methodology | Technical consultee | Further discussions regarding how to integrate surface and groundwater into the process.  |
|  | Technical consultation regarding the draft SFRA.  | 21 October 2022 | Strategic Flood Risk Assessment Level 1  | Technical consultee  | Comments were provided in relation to the sequential test methodology from relevant officers on behalf of WSCC as Local Lead Flood Authority.Other relevant consultees within WSCC were also consulted, namely Emergency Planners and Highways, but no response was received from those departments.  |
|  | Meeting (with National Highways) | 23 May 2023 | See National Highways entry | See National Highways entry | See National Highways entry |
|  | Meeting  | 12 June 2023 | A27 Fishbourne Roundabout Terminus Road realignmentA27 Bognor roundabout Junction contributions Monitor and Manage approachDevelopment at Southbourne on the local road network. | To discuss WSCC highway related comments specifically relating to the A27 Fishbourne Roundabout Terminus Road realignment, Bognor Junction in relation to Arun District Council schemes, discussion of Monitor and Manage approach and impact of development at Southbourne on the local road network. | CDC agreed to carry out additional feasibility work on the Terminus Road realignment element of the A27 Fishbourne Roundabout scheme. WSCC to assist in providing updated list of transport schemes to feed into monitor and manage approach. CDC agreed to prepare a Transport Background Paper to include detail of sustainable transport schemes. Joint meeting with WSCC and Stagecoach to be arranged. Southbourne assessment information provided to WSCC to review. CDC to review (via Stantec) WSCC comments on northern plan area assessment.  |
|  | Joint Meeting (with National Highways)  | 16 June 2023 | See National Highways entry | See National Highways entry | See National Highways entry |
|  | Joint Meeting (with National Highways) | 17 July 2023 | See National Highways entry | See National Highways entry | See National Highways entry |
|  | Joint Meeting (with National Highways) | 8 September 2023 | See National Highways entry | See National Highways entry | See National Highways entry |
|  | Workshop (with National Highways) | 6 October 2023 | See National Highways entry | See National Highways entry | See National Highways entry |
|  | Joint Meeting (with National Highways) | 18 December 2023 | See National Highways entry | See National Highways entry | See National Highways entry |
|  | Transport Infrastructure Management Group (with National Highways and Arun District Council) | 10 April 2024 | See National Highways entry | See National Highways entry | See National Highways entry |
| **Other local authorities** |
| **Crawley Borough Council (CBC)** |  |  |  |  |  |
|  | Letter (Member) | 21 January 2020 | Crawley unmet housing and employment land need | Crawley approach under DtC | CDC advised unable to accommodate unmet needs arising from Crawley – issues in delivering CDCs housing need, other areas with unmet needs more directly related to Chichester |
|  | Response to Crawley Regulation 19 consultation | 7 March 2021 | Crawley unmet housing need | CDC statutory consultee | Encourages CBC to further investigate all potential opportunities to increase housing provision in plan area |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | DtC approach (within wider HMA) | Crawley unable to accommodate unmet needs.  |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | DtC approach (within wider HMA) | No response. |
|  | Letter (officer) | 14 April 2023 | Formal letter requesting CDC’s assistance in addressing CBC’s unmet housing need, self and custom built homes and affordable housing needs. | Crawley approach under DtC | CDC advised (25/5/23) unable to assist as have own unmet housing and affordable housing need. If were able to take unmet need would first assist authority areas more directly related to Chichester Plan Area.Provision for self and custom build housing unlikely to be suitable for those on CBC’s register owing to geographical location. |
|  | Response to Crawley Regulation 19 consultation | 9 May 2023 | Crawley unmet housing need | CDC statutory consultee | CDC advised support approach to housing provision and commitment to continue working with neighbouring authorities, particularly those in Northern West Sussex HMA, on exploring opportunities for meeting unmet need.Supports approach to water neutrality and Policy SDC4 and would welcome continued joint working with CBC on implementation of water neutrality scheme. |
| **Fareham District Council** |  |  |  |  |  |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | DtC approach (within wider HMA) | Fareham unable to accommodate unmet needs. Fareham following stepped approach in early plan area to meet own needs and already accommodating unmet need from South Hampshire sub-region |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | DtC approach (within wider HMA) | At later stages of plan preparation having gone through examination hearings and recent consultation on Inspector’s Main Modifications. Inspector so far not expressed any fundamental concern with housing supply nor contribution to unmet need and contribution to unmet need also deemed acceptable by other PfSH members as confirmed in Statement of Common Ground. Should PfSH work conclude Fareham should make additional contribution to meet subregional unmet need this would remain focus for Fareham and as result unlikely would be any capacity to assist with wider unmet needs outside subregion.Unable to offer assistance to CDC in meeting Gypsy and Traveller/Travelling Showpeople need. |
| **Gosport District Council** |  |  |  |  |  |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | DtC approach (within wider HMA) | Gosport unable to consider accommodating CDC unmet need at this stage. Gosport dealing with own unmet housing need and restricted supply of housing sites |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | DtC approach (within wider HMA) | No response |
| **Guildford Borough Council** |  |  |  |  |  |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | DtC approach (within wider HMA) | Guildford unable to accommodate unmet needs. Limited functional links between two authorities and within different housing market areas |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | DtC approach (within wider HMA) | No change in position since December 2021 response on unmet housing needs.Have built in flexibility to meet any future arising local pitch/plot needs through requirement to make provision on strategic sites. However, not all the homes on these sites will be delivered within Plan period, thereby not triggering thresholds requiring the provision of pitches/plots. Do not consider level of sites identified is, in reality, much greater than needed and there is therefore no surplus that could be considered to meet any unmet needs arising from elsewhere. |
| **Lewes District Council** |  |  |  |  |  |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | DtC approach (within wider HMA) | Lewes DC unlikely to be able to meet own housing need or have capacity to meet unmet need of other authorities due to environmental, landscape and infrastructure constraints. |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | DtC approach (within wider HMA) | No response |
|  | Letter | 3 April 2024 | Accommodating LDC housing need | DtC approach (within wider HMA) | Advance notification from LDC of potential unmet housing need and consideration of accommodating unmet need. CDC response unable to assist as have own unmet housing. If were able to take unmet need would first assist authority areas more directly related to Chichester Plan Area. |
| **Mid Sussex District Council** |  |  |  |  |  |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | DtC approach (within wider HMA) | No change in position since 2014 MoU that given relative distance between authorities would not be sustainable for Mid Sussex to meet CDCs general housing needs. Mid Sussex would give priority to authorities within North West Sussex HMA and then Greater Brighton area |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | DtC approach (within wider HMA) | Position remains as that given in December 2021. No change in circumstance to suggest this position has changed or that other areas have higher priority should Mid Sussex be in a position to make any contribution to needs arising outside its area. Most appropriate mechanism for addressing unmet need is through progression of LSS3.Due to a shortage of available sites, Mid Sussex is unable to assist in meeting Chichester’s unmet Gypsy and Traveller/Travelling Showpeople needs. |
| **Portsmouth City Council** |  |  |  |  |  |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | DtC approach (within wider HMA) | Portsmouth unable to meet own housing needs |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | DtC approach (within wider HMA) | No response |
| **Winchester City Council** |  |  |  |  |  |
|  | Letter | 10 December 2021 | Accommodating CDC unmet housing need | DtC approach (within wider HMA) | Unable to confirm until further work on housing need at sub-regional and local plan level had progressed but query whether most appropriate authority to meet unmet need given different HMAs and distance from Chichester |
|  | Letter | 12 December 2022 | Accommodating CDC unmet housing and Gypsy and Traveller/Travelling Showpeople needs | DtC approach (within wider HMA) | Recent Regulation 18 consultation Plan allows for a modest buffer to cater for potential changes to ‘standard method’ and/or help with unmet needs of nearby authorities. Given Winchester is in a different housing market to majority of Chichester District, would expect any surplus that Winchester may eventually identify to contribute to meeting needs of neighbouring Hampshire authorities.Recently completed GTAA identifies considerable current and future unmet need for both pitches and plots, which will increase if non-travelling travellers are included. Likely to be heavily reliant on windfall provision through criteria based policies in emerging local plan and therefore extremely unlikely that will be in position to help unmet need of nearby authorities. |
| **Adur and Worthing Councils** |  |  |  |  |  |
|  | Joint evidence base study (Adur, Arun, CDC, Worthing) | October 2018 | Gypsy and Traveller Accommodation Needs | Joint evidence study for four West Sussex coastal authorities | Identified needs for each local authority area |
|  | Response to Worthing Regulation 18 Local Plan | December 2018 | Unmet housing need; | CDC statutory consultee | Encourages Worthing to further investigate all potential opportunities to increase housing provision in plan area, commit to working through the WSGB Strategic Planning Board to ensure strategic development and infrastructure needs are met, supports in principle gaps policy subject to further evidence to justify their extent |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | Offers broad support for the proposed housing delivery of the Plan, noting that the infrastructure demands in Chichester may require public subsidy in order to deliver this level of housing. Highlights the identified unmet needs arising from Worthing Borough and the potential unmet needs also arising from Adur District. Commits to the work of the Strategic Planning Board in providing the appropriate mechanism within which sub-region’s wider development needs can be met in longer term |
|  | Officer meeting | 22 November 2019 | Update of LP progressDiscussion of: housing requirements, supply and unmet need; affordable housing; employment; transport; other cross boundary issues; preparation of SoCG | DtC liaison meeting to review progress and share information | Adur and Worthing have significant unmet housing need. Will be looking to ‘leave no stone-unturned’ in looking for potential sites but will also be exploring whether any nearby areas could assist to meet some of the unmet need in the sub-region. Request CDC does all it can to assist in this. CDC requested to clarify housing supply position in each sub plan area.No significant cross boundary employment issuesAdur to confirm progress of SoCG by Strategic Partnership BoardDraft SoCG to be circulated |
|  | Memorandum of Understanding (with Adur and Worthing) | January 2020 | Housing/Affordable HousingTransportEmploymentOther Cross Boundary Issues |  | Details current position on identified issues and areas for continued joint working |
|  | Officer meeting | 22 October 2020 | Update on LP progress; preparation of SoCG | DtC liaison meeting to review progress and share information | Adur to circulate draft SoCG |
|  | Response to Worthing Regulation 19 Local Plan | 23 March 2021 | Worthing unmet housing need | CDC statutory consultee | CDC unable to agree to accommodate unmet needs whilst undertaking LPR - issues in delivering CDCs housing need, other areas with unmet needs more directly related to Chichester |
|  | Statement of Common Ground (with Worthing BC) | 21 May 2021 |  |  | Details joint working undertaken and areas of agreement in relation to Worthing Local Plan |
| **Surrey County Council** |  |  |  |  |  |
|  | CDC Issues and Options | June – August 2017 |  | Statutory consultee | Welcome reference to need to consider cross-boundary linkages with Surrey. Suggest mention should also be made of need to consider any potential cross-boundary impacts of new development on infrastructure. |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | No response |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update | To take account of any cross boundary issues | Concern over potential impacts of development in northern plan area, particularly of the highest growth option, on secondary school provision in Cranleigh and from increased traffic on specific roads and junctions within Surrey |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP update | To take account of any cross boundary issues | No response |
| **Hampshire County Council** |  |  |  |  |  |
|  | CDC Issues and Options | June – August 2017 |  | Statutory consultee | No response |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | No response |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update | To take account of any cross boundary issues | Identified cross boundary issues for further discussion, particularly highway related impacts that could arise from development along the A27 corridor |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP update | To take account of any cross boundary issues | No response |
|  | Officer meeting (Teams) | 17 May 2023 | Discussion of HCC response to CDC Reg19 Local Plan | DtC liaison meeting to consider cross boundary infrastructure issues | Additional traffic impact work to be undertaken by Stantec and Technical Note provided to HCC for review. Agreement to progress draft SoCG following this. |
|  | Officer meeting (Teams)  | 21 June 2023 | Discussion of HCC response to CDC Reg19 Local Plan | DtC liaison meeting to consider cross boundary infrastructure issues | Discussion of Technical Note. CDC to update SoCG to reflect discussion to date for HCC to review. |
|  | Officer meeting (Teams) | 8 January 2024 | Update on CDC Local Plan transport evidence | DtC liaison meeting | CDC have been working through number of issues with National Highways related to age of transport model and required mitigation. NH position is that cannot commit to Fishbourne junction improvement, mitigation package to be determined through Monitor and Manage process. Impact of not implementing Fishbourne junction improvement on Hampshire network to be included in revised Technical Note. Stantec to issue revised Technical Note for HCC feedback. |
|  | Technical Note | 22 February 2024 | Transport impacts on A259 | Cross boundary infrastructure (transport) | Revised Technical Note provided to HCC for feedback.  |
|  | Letter | 1 May 2024 | Transport impacts on A259 | Cross boundary infrastructure (transport) | HCC feedback on Technical Note provided. Further information sought on model/data used as part of modelling work and how A259/North Street roundabout, Emsworth has been modelled. Further discussion on mitigation measures related to Southbourne BLD.Stantec to prepare further Technical Note. |
| **West Sussex and Greater Brighton Planning Board** |  |  |  |  |  |
|  | Draft Statement of Common Ground | January 2021 | Long term sustainable economic growth Delivering housing needs Infrastructure developmentAddressing both climate change and biodiversity emergencies Identifying potential growth options to meet development needsNutrient neutralitySafeguarding mineral reserves  |  | Outlines the relationship of the WS & GB Strategic Planning Board with the strategic planning activities in the area. It sets out how the local authorities have successfully worked together on strategic planning matters and how they continue to do so |
|  | Letter | 10 December 2021 | CDC unmet housing need |  | Highlight issues around meeting CDC local housing need figure in full and A27 capacity and investment for further discussion by WS & GB Planning Officer’s group. |
| **Prescribed Bodies** |
| **Environment Agency (EA)** |  |  |  |  |  |
|  | CDC Issues and Options | June – August 2017 |  | Statutory consultee | Highlighted need for Local Plan to be informed by appropriate evidence i.e. flood risk and address issues around water quality, wastewater and sources of flooding |
|  | Evidence input/feedback | May 2018 | Infrastructure provision (preparation of IDP to support LPR) | To take account of development impacts on water quality and flood risk | Provision of information relating to specific flood risk and habitat creation schemes |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | Comments on policies and proposed allocations |
|  | Multi organisation officer meeting (CDC, EA, Southern Water) | 18 June 20192 March 202025 January 2021 (also with Havant BC) | Wastewater quality | To understand implications of development on available treatment capacity | Preparation of information on WwTW headroom capacity and discussions on calculations related to revised development distribution |
|  | Officer meeting | 11 September 2019 | Wastewater quality |  | Drafting of position statement |
|  | Online Multi organisation officer meeting (CDC, EA, Southern Water) | 13 August 2020 | Wastewater quality | Capacity and growth requirements, SOCG drafting | Discussion around possible solution for development to be diverted to most appropriate WwTW rather than closest. CDC to consider phasing of allocations and policy wording |
|  | Evidence input/feedbackOfficer meeting | December 20209 January 202122 February 2021 | Revised development distribution and IDP update | To take account of development impacts on water quality and flood risk | EA generally support development to the eastern side of the plan area due to the waste water treatment capacity issues within the Apuldram catchment in the west. The EA confirm that new development should ideally look for connection to Tangmere WwTW. EA is also pleased to see that proposed housing has been reduced on the Manhood Peninsula due to potential increased flooding from sea level rise and that site AL6 (land south west of Chichester) has been removed.  |
|  | Officer meeting | 29 June 2021 | Discussion on capacity of Thornham WwTW | To understand implications of development on available treatment capacity | Agreed that need for solutions to be investigated and phasing of development to later in plan period |
|  | Technical consultation | July – September 2021 | Strategic Wildlife Corridors new/changes to proposed routes | Technical consultee | No specific comments |
|  | Statement of Common Ground (also with Southern Water)  | November 2021 | Wastewater treatment |  | Details position on wastewater capacity of those treatment works serving the Plan Area and, options for improvement measures and timetable for identifying solutions |
|  | Thornham Position Statement (also with Southern Water) | November 2021 | Wastewater treatment – Thornham WwTW |  | Joint statement about managing treatment capacity at Thornham. |
|  | Evidence input/feedback | 2021/22 | Feedback on draft SFRA | Relevant technical party |  |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update | Technical consultee | Information on site specific constraints |
|  | Meeting between officers, consultants (representing the council) and representatives of EA.  | 16 September 2022 | Implications of updates to Planning Practice Guidance on 25 August.  | Technical consultee | EA provided guidance in relation to the new PPG guidance and the implications for the SFRA process/ sequential test methodology, such as need for additional modelling. Further clarification also provided via email.  |
|  | Technical consultation regarding the draft SFRA.  | 21 October 2022 | Strategic Flood Risk Assessment Level 1  | Technical consultee  | Technical comments received regarding some limited methodological issues.  |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP update | Technical consultee | Minor updates to IDP |
|  | Email | 22 November 2022 | Wastewater treatment | To update wastewater position and reflect updated housing trajectory | To identify necessary updates to SoCG |
|  | Teams meeting | 23 February 2023 | Discussion of capacity at Bosham WWTW and updating the Statement of Common Ground | To discuss updates to the Statement of Common Ground including timing of new Dry Weather Flow data.  | Southern Water to have another look at latest draft of SoCG and to update headroom tables with new DWF data as soon as available. SW reiterate that they are required to find solutions once development locations are confirmed through allocation or permission. We discussed that where permits could not be increased due to environmental constraints there would be other solutions to reduce the flow to the works which should be reflected more clearly in the SoCG.  |
|  | Teams meeting (also with Southern Water) | 25 July 2023 | Discussion of the Statement of Common Ground (after circulation of suggested edits by email) | To finalise the SoCG | After discussion the SoCG was further revised and updated, taking account of proposals in the published DWMP and subsequently agreed by email in September 2023. |
|  | Email | 5 March 2024 | Draft SoCG circulated for any updates | To identify whether any updates are needed to the SoCG before signature.  | After further minor amendments Southern Water signed the SoCG on 19/4/24 and Environment Agency signed on 25/04/24. |
|  | Statement of Common Ground (also with Southern Water)  | 30 April 2024 | Wastewater treatment |  | Details position on wastewater capacity of those treatment works serving the Plan Area and, options for improvement measures and timetable for identifying solutions |
| **Natural England**  |  |  |  |  |  |
|  | CDC Issues and Options | June – August 2017 |  | Statutory consultee | Highlighted need to consider in combination effects on designated conservation sites, impacts of development on protected landscapes and opportunities for biodiversity net gain. |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 | Habitats Regulation Assessment | Statutory consultee | Concurs with HRA findings. |
|  | Evidence input/feedback | December 2020 | Revised development distribution and IDP update | To take account of development impacts on natural environment | LPR should address both nitrate and water neutrality requirementsThe Local Plan should plan for the forecasted increased capacity demands on WwTW.  |
|  | Technical consultation | July – September 2021 | Strategic Wildlife Corridors new/changes to proposed routes | Technical consultation | No response |
|  | Officer meeting | 24 January 2022 | Draft LPR coastal policies | Informal consultation on emerging policies | Advice on reframing policies |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update |  | No response |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP update |  | No specific comments |
|  | Officer meeting and AECOM re HRA  | 29 June 2023 | HRA issues raised by NE – in particularly air quality | To resolve issues raised by NE | Further work to be undertaken by AECOM on air quality arguments; re-run of data subject to AQ data on new housing figures to be provided by Stantec |
|  | Officer meeting | 27 July 2023 | Local Plan vision and objectives, natural environment policies (NE2, NE5, NE6, NE7, NE9, NE10, NE14, NE16, NE19), housing policies (H11 – H14), placemaking policy (P14), economic policies (E4, E9) | To discuss NE representations and agree wording changes | Wording changes were discussed and agreed  |
|  | Officer meeting (with Coastal Partners) | 22 August 2023 | Coastal policies | To discuss NE representations on Coastal policies and to consider wording amendments to pick up the NCERM and the differences between harbour and open coast.  | Revised wording discussed, redrafts shared and after several iterations agreed by email  |
|  | Officer meeting | 5 September 2023 | Wildlife corridors | To discuss basis of evidence for wildlife corridors and boundaries, including Policy A8 East of Chichester and bat evidence, and overall approach to wildlife corridor strategy.  | Agree changes to policy, including removal of sequential test. Agree to approach about removing proposed extension of HDA from Westhampnett-Pagham corridor. Discussion about evolution of corridors, and agreement that the approach has been proportionate and is supported.  |
|  | Officer meeting (with AECOM) | 11 September 2023 | HRA and air quality issues |  | Agreed actions for further technical work required |
|  | Officer meeting | 17 November 2023 | HRA and air quality issues |  | Agreed actions for further technical work required |
|  | Officer meeting (with AECOM) | 12 February 2024 | HRA and air quality issues |  | NE confirm only remaining outstanding issue is ammonia and The Mens SAC |
|  | Meeting with SE Regional Director of NE (James Seymour), specialist NE officers, Horsham DC and CDC officers  | 8 March 2024 | Follow up on HRA and air quality issue related to The Mens SAC |  | Agreed actions for further technical work required |
| **Civil Aviation Authority (CAA)** |  |  |  |  |  |
|  | CDC Issues and Options | June – August 2017 |  | Statutory consultee | No response |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | No response |
| **Historic England** |  |  |  |  |  |
|  | CDC Issues and Options | June – August 2017 |  | Statutory consultee | Highlighted issues around historic environment and heritage assets to be considered in plan preparation |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 | Historic environment | Statutory consultee | Comments on historic environment policies and some suggested amendments to better reflect requirements of NPPF |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update |  | Allocation of sites should be informed by assessment of impacts on historic environment |
|  | Email | March 2022 | Draft LPR heritage policies | Informal consultation on emerging heritage policies | Advice on reframing policies to provide proactive approach to heritage |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP update |  | Comments on need to ensure infrastructure projects avoid and minimise harm to historic environment. |
| **Homes England** |  |  |  |  |  |
|  | CDC Preferred Approach Local Plan | January - February 2019 | Site deliverability (Policy AL5) | Statutory consultee | Revisions to policy criteria to clarify position regarding retention of playing pitch |
|  | Multi organisation officer meeting (CDC, WSCC, NH, Homes England) | 30 June 2021 | Strategic transport and infrastructure funding |  | Agreed that mitigation package could not be funded by developer contributions alone.Homes England advised that no appropriate external funding pot available and no certainty of any future appropriate funding sourceHighways England advised no certainty that national scheme will be forthcoming and nor could it be assumed that it would provide capacity of itself to support future developmentHighway authorities willing to consider phased incremental improvements based on revised work Stantec had carried out, whilst recognising that these works may not be able to be delivered financially over the plan period. CDC to carry out some further work on putting a proposal together for an alternative approach.  |
| **NHS Sussex** |  |  |  |  |  |
|  | Evidence input/feedback | May 2018 | Infrastructure provision (preparation of IDP to support Local Plan) | To take account of any health infrastructure issues | Identification of health infrastructure required to support development |
|  | Evidence input/feedback | December 2020 | Revised development distribution and IDP update |  | No response received |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update |  | Identification of health infrastructure required to support development |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP update |  | No change to previously identified health infrastructure |
|  | Teams Meeting | 22 March 2023 | Primary Care proposals update and to discuss needs in the North of the Plan Area | On request of meeting from Health Authority as a result of the IBP consultation, and for us to tease out any capacity issues north of the plan area | Update has been provided. Langley House surgery extension no longer being pursued. Willow Park teleconferencing being pursued actively which will pick up needs from all across the plan area including the area north of the South Downs National Park. |
| **Office of Road and Rail (ORR)** |  |  |  |  |  |
|  | CDC Issues and Options | June – August 2017 |  | Statutory consultee | No response |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | No response |
| **National Highways (NH)** |  |  |  |  |  |
|  | CDC Issues and Options | June – August 2017 |  | Statutory consultee | Highlighted need to consider impacts of additional/redistributed housing and employment developments on A27 and mitigation viable and deliverable |
|  | Email | 2 February 2018 | Invitation to comment on draft brief for CDC Transport Study/Modelling | Technical consultee input | Suggested revisions to brief |
|  | Evidence input/feedback | May 2018 | Infrastructure provision (preparation of IDP to support Local Plan) |  | Updates to highway projects |
|  | CDC Preferred Approach Local Plan | December 2018 – February 2019 |  | Statutory consultee | Satisfied package of highway improvements identified will mitigate impacts on SRN but number of issues to consider further around costs, use of CPO, developer contributions and updating of SPD. |
|  | Multi organisation officer meeting (CDC, WSCC, NH) | 29 January 2019 | Local Plan A27 mitigation | Liaison with Highway Authorities |  |
|  | Multi organisation officer meeting (CDC, WSCC, NH) | 4 March 2019 | Local Plan A27 mitigation | Liaison with Highway Authorities | Discussion of NH/WSCC response to Preferred Approach and implications, commissioning of A27 feasibility work |
|  | Multi organisation officer meeting (CDC, WSCC, NH) | 15 November 2019 | Local Plan A27 mitigation | Liaison with Highway Authorities | Update of NH review of Transport Study and potential funding streams given acknowledgement that costs of delivering the A27 junction improvements would be unlikely to be capable of being borne by developer contributions alone |
|  | Multi organisation officer meeting (CDC, NH, WSCC) | 19 December 2019 | Impact of emerging Local Plan allocations on phasing of A27 improvement works  | Statutory consultee | Agreed to explore potential to commence design work on A27 junction improvements, possibly utilising funding already secured HE to investigate timing of implementation of adopted LP mitigation schemes taking into account CDC and Arun DC updated housing land supply and proposed mitigation for Local Plan Review. Review Transport Study cost estimates and sign study off.CDC to review funding opportunities/sources available for A27 mitigation |
|  | Multi organisation officer meeting (CDC, WSCC, NH, Homes England) | 30 June 2021 | Strategic transport and infrastructure funding |  | Agreed that mitigation package could not be funded by developer contributions alone.Homes England advised that no appropriate external funding pot available and no certainty of any future appropriate funding sourceHighways England advised no certainty that national scheme will be forthcoming and nor could it be assumed that it would provide capacity of itself to support future developmentHighway authorities willing to consider phased incremental improvements based on revised work Stantec had carried out, whilst recognising that these works may not be able to be delivered financially over the plan period. CDC to carry out some further work on putting a proposal together for an alternative approach.  |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update |  | Need for development to be supported by robust Transport Assessment to consider individual/cumulative impacts on A27 |
|  | Multi organisation officer meeting (ADC, CDC, WSCC, NH) | 31 March 2022 | Transport matters relating to A27 and A259 | Cross boundary transport issues | No meeting note |
|  | Evidence input/feedback | October 2022 | Revised development distribution and IDP update |  | No response |
|  | Joint Hybrid Meeting (with WSCC) | 23 May 2023 | National Highways and WSCC response to the Regulation 19 Local Plan, including evidence requirement, monitor and manage package and draft Statement of Common Ground | To seek clarification of National Highways and WSCC position, agree scope of any additional work required and progress monitor and manage and Statement of Common Ground between the parties.  | CDC agreed to carry out additional work on developing the package of sustainable transport measures that would form part of the monitor and manage package and to model the impact of these schemes.  |
|  | Joint Hybrid Meeting (with WSCC) | 16 June 2023 | National Highways and WSCC response to the Regulation 19 Local Plan, including evidence requirement, monitor and manage package and draft Statement of Common Ground | To seek clarification of National Highways and WSCC position, agree scope of any additional work required and progress monitor and manage and Statement of Common Ground between the parties. | CDC to provide information to NH on local plan impact on SRN.CDC to undertake further work on sustainable transport measures/projects for inclusion in monitor and manage proposals and assess impact on mitigation of proposed Local Plan |
|  | Joint Meeting (with WSCC) | 17 July 2023 | National Highways and WSCC response to the Regulation 19 Local Plan, including evidence requirement, monitor and manage package and draft Statement of Common Ground | To seek clarification of National Highways and WSCC position, agree scope of any additional work required and progress monitor and manage and Statement of Common Ground between the parties. | Discussion on work undertaken to date on monitor and manage proposals and mitigation. |
|  | Joint Meeting (with WSCC) | 8 August 2023 | National Highways and WSCC response to the Regulation 19 Local Plan, including evidence requirement, monitor and manage package and draft Statement of Common Ground | To seek clarification of National Highways and WSCC position, agree scope of any additional work required and progress monitor and manage and Statement of Common Ground between the parties. | CDC to arrange meeting with Homes England and to look into other sources of funding.Monitor and manage report to be issued to WSCC for review.Clarification on Reg19 representations made by NH and which are to be treated as formal objections to soundness of Local Plan. |
|  | Joint Meeting (with WSCC) | 8 September 2023 | National Highways and WSCC response to the Regulation 19 Local Plan, including evidence requirement, monitor and manage package and draft Statement of Common Ground | To seek clarification of National Highways and WSCC position, agree scope of any additional work required and progress monitor and manage and Statement of Common Ground between the parties. |  |
|  | Workshop (with WSCC) | 6 October 2023 | Discussion of transport evidence, impacts and mitigation, further work required | To seek clarification of National Highways and WSCC position, agree scope of any additional work required |  |
|  | Meeting with National Highways, Gillian Keegan (MP) | 27 October 2023 | Discussion of transport evidence, impacts and mitigation, further work required | To seek clarification of National Highways position, agree scope of any additional work required | Agreed position around severity of impact without mitigation.Technical meetings to follow between officers from CDC and National Highways (and advisors). |
|  | Technical meeting with Jacobs (on behalf of National Highways) | 30 October 2023 | Discussion of transport evidence, impacts and mitigation, further work required | To agree issues and scope of any additional work required | Discussed scope of verification/validation surveys to inform existing model understanding.Consideration of cumulative impact of unmitigated adopted plan alongside proposed submission plan |
|  | Meeting with National Highways Local Plan Technical Issues Discussion and way forward | 1 November 2023 | Discussion of transport evidence, impacts and mitigation, further work required | To work through refinement of transport evidence | See outcomes of meeting 10 November 2023 |
|  | Meeting with National Highways, Gillian Keegan (MP) | 3 November 2023 | Discussion of transport evidence, impacts and mitigation, further work required | To update on progress of technical meetings | See outcomes of meeting 10 November 2023 |
|  | Meeting with National Highways Local Plan Technical Issues Discussion | 8 November 2023 | Discussion of transport evidence, impacts and mitigation, further work required | To work through refinement of transport evidence | See outcomes of meeting 10 November 2023 |
|  | Meeting with National Highways, Gillian Keegan (MP) | 10 November 2023 | Discussion of transport evidence, impacts and mitigation, further work required | To update on progress of technical meetings | Reached agreed position on transport model, the scope of development to be mitigated and severity of impact, NH position on proposed junction improvements.Further work to be undertaken to inform use of model |
|  | Chichester Local Plan Transport Matters (with WSCC) | 18 December 2023 | Discussion of transport evidence, impacts and mitigation, further work required | To provide updates on evidence and monitor and manage strategy  | Work to be incorporated into technical note and revised transport assessment |
|  | Transport Infrastructure Management Group (with WSCC and Arun District Council) | 10 April 2024 | Terms of Reference, monitor and manage strategy, transport evidence | Ongoing cooperation of CDC and key stakeholders to resolve transport issues | Terms of Reference discussed and amendments put forward.Feedback on evidence and monitor and manage strategy provided |
| **Marine Management Organisation (MMO)** |  |  |  |  |  |
|  | CDC Preferred Approach Local Plan | January - February 2019 | Marine planning | Statutory consultee | Request to include reference to relevant Marine Plans and guidance |
|  | Technical consultation regarding the draft SFRA.  | 21 October 2022 | Strategic Flood Risk Assessment Level 1  | Technical consultee  | No comments received. |
| **Coast to Capital (LEP)** |  |  |  |  |  |
|  | CDC Preferred Approach Local Plan | January - February 2019 |  |  | No response |
|  | Meeting | July 2021 | Funding for A27 improvement package | Funding body | Confirmation that not in position to provide funding |
|  | Evidence input/feedback | January 2022 | Revised development distribution and IDP update |  | No response |
| **Sussex Nature Partnership (LNP)** |  |  |  |  |  |
|  | CDC Preferred Approach Local Plan | January - February 2019 |  |  | No response |
|  | Technical consultation | July – September 2021 | Strategic Wildlife Corridors new/changes to proposed routes | Technical consultation | No response |
| **Southern Water** |  |  |  |  |  |
|  | Statement of Common Ground (also with Environment Agency) | November 2021 | Wastewater treatment |  | Details position on wastewater capacity of those treatment works serving the Plan Area and, options for improvement measures and timetable for identifying solutions |
|  | Technical consultation regarding the draft SFRA.  | 21 October 2022 | Strategic Flood Risk Assessment Level 1  | Technical consultee  | Comments were provided in relation to the incidents of historic flooding.  |
|  | Email | 22 November 2022 | Wastewater treatment | To update wastewater position and reflect updated housing trajectory | To identify necessary updates to SoCG |
|  | Teams meeting | 23 February 2023 | Discussion of capacity at Bosham WWTW and updating the Statement of Common Ground | To discuss updates to the Statement of Common Ground including timing of new Dry Weather Flow data.  | Southern Water to have another look at latest draft of SoCG and to update headroom tables with new DWF data as soon as available. SW reiterate that they are required to find solutions once development locations are confirmed through allocation or permission. We discussed that where permits could not be increased due to environmental constraints there would be other solutions to reduce the flow to the works which should be reflected more clearly in the SoCG.  |
|  | Teams meeting (also with Environment Agency) | 25 July 2023 | Discussion of the Statement of Common Ground ( after circulation of suggested edits by email) | To finalise the SoCG | After discussion the SoCG was further revised and updated, taking account of proposals in the published DWMP and subsequently agreed by email in September 2023. |
|  | Email | 22 February 2024 | Revised housing trajectory provided by CDC | Information requested by Southern Water – their tables using this data will inform whether any updates are needed to SoCG |  |
|  | Email | 5 March 2024 | Draft SoCG circulated for any updates | To identify whether any updates are needed to the SoCG before signature.  |  |
|  | Statement of Common Ground (also with Environment Agency)  | 30 April 2024 | Wastewater treatment |  | Details position on wastewater capacity of those treatment works serving the Plan Area and, options for improvement measures and timetable for identifying solutions |
| **Portsmouth Water** |  |  |  |  |  |
|  | Technical consultation regarding the draft SFRA.  | 21 October 2022 | Strategic Flood Risk Assessment Level 1  | Technical consultee  | No comments received.  |
|  | Email | 26 June 2023 | Email to clarify the response in relation to 110lppd (seeking 100) – to confirm there was no new evidence to justify a lower figures since previous correspondence on this in 2021 | To clarify whether the representation was an objection | Response from PW on 26/06/23 confirming the response is not an objection and that a target of 100 would not currently be enforceable as no new evidence or other legal mechanism.  |

# Appendix 2: Summary of representations to Regulation 19 Local Plan from Duty to Cooperate bodies

Note: representations of support are not included in the table

| **DtC body** | **Plan section** | **Rep ref** | **Representation summary** | **CDC response** | **Potential change to Local Plan**(New text in **bold**, deleted text ~~crossed through~~) |
| --- | --- | --- | --- | --- | --- |
| Arun District Council | Policy S1 | 4909 | Development Strategy leaves significant level of unmet need unresolved and may have cross boundary A27 capacity and development viability implications for planned and committed development in Arun and also future plan making. CDC development strategy should account for cross boundary contributions and positive steps to secure phased development needs allied to infrastructure to address its unmet need as far as possible. | The Council have sought to address unmet needs during the preparation of this Local Plan and, in the absence of progress on the LSS3 update, have engaged with both neighbouring authorities and those in the wider region but, as set out in the updated Statement of Compliance, no authority has confirmed that it is in a position to accommodate any of the Plan Area’s unmet need.As set out in Policy T1 (Transport Infrastructure) development may be phased to align with the provision of new transport infrastructure. | No change in response to this representation. |
|  | Policy H1 | 4928 | Policy should account for cross boundary infrastructure mitigation contributions and secure phased development needs allied to infrastructure to address unmet need (including via West Sussex and Greater Brighton Strategic Planning Board i.e. Local Strategic Statement - LSS3 update) | Discussions are ongoing with Arun District Council to agree a Statement of Common Ground. | No change in response to this representation. |
|  | Policy T1 | 4949 | i) Chichester District Council's Regulation 19 Local Plan Policy T1 Transport Infrastructure should account for the cross boundary mitigation contributions and remove the uncertainty over how cross boundary contributions towards schemes such as Bognor Road and Whyke road roundabouts will be pooled to other A27 mitigation solutions, such that there are no averse implications for delivering committed developments in Arun (e.g. West of Bersted, Pagham North and South). ii) The policy or supporting text (e.g. paragraph 8.11) should also clarify whether any additional housing achieved via the monitor and manage approach above 575 dwellings per annum will safeguard against potential adverse cross boundary implications (e.g. on the A259 at Oystercatcher and Comet corner junctions in Arun) and how necessary mitigations would be phased/triggered with additional housing.  | i) Further discussion as to how Arun have sought to attribute the collection of receipts toward junction improvements within S106 agreements will be needed as part of the on-going dialogue between the two local authorities. The Chichester Local Plan Review is proposing to use existing funding captured through schemes in Chichester District and further contributions to be secured through future schemes identified in the Pre-Submission Local Plan in order to deliver Bognor and Fishbourne Junction improvements (or as otherwise identified through the Monitor and Manage proposals). Arun is represented at the TIMG and will therefore be party to recommendations by this group as to how and when mitigation should be delivered.ii) The council has shared technical evidence with Arun DC that draws out the impact of the Chichester Pre-Submission Local Plan on the A259 Comet Corner and Oyster Catcher junctions. The analysis demonstrates that there is negligible impact on these junctions as a result of the further growth within Chichester District, as a result of the Pre-Submission Plan. As there is no significant impact identified, there are no proposals that further contributions or improvements are required to those junctions on the basis of the level of development proposed in the southern plan area. | No change in response to this representation. |
|  | A27 Mitigation contributions | 4992 | Concern that contributions not effective and should account for cross boundary mitigation contributions and remove uncertainty over how cross boundary contributions towards schemes such as Bognor Road and Whyke road roundabouts will be pooled to other A27 mitigation solutions such that there are no adverse implications for delivering committed developments in Arun and the viability of developments. | The Local Plan is proposing to use existing funding captured through schemes in Chichester District and further contributions to be secured through future schemes identified in the Proposed Submission Local Plan in order to deliver appropriate mitigation package. This will need to capture existing development within the adopted Local Plans of both Chichester and Arun, in addition to new development within the Chichester Proposed Submission Local Plan. CDC acknowledges the potential for a range of mitigation options to be delivered within the funding available, and Policy T1 has been amended to reflect this. Arun is represented at the TIMG and will therefore be party to recommendations by this group. | No change in response to representation, however mods to Policy T1 cover some issues raised, and envisage solution through the TIMG. |
| Horsham District Council | Policy S1 | 5261 | Need to justify, through SoCG with NH, lower housing supply figure and demonstrate why constraints on A27 will not allow higher growth in east-west corridor and evidence maximum housing needs have been achieved in city and east-west corridor. | The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers. The agreed position with the highway authorities is set out a SoCG. | No change in response to this representation. |
|  | Policy H1 | 5264 | Acknowledge land supply constrained and CDC meeting full housing requirement within administrative area would be challenging. HDC not in position to accommodate any unmet need. | The justification for not meeting the housing needs in full is set out in the Housing Need and Transport Background Papers.  | No change in response to this representation. |
|  | Policy H11 | 5266 | Not able to accommodate any unmet need as will be challenging to meet own shortfall. Support approach of intensification of sites.  | Comments noted, council is happy to continue engaging in future duty to co-operate discussions regarding this issue. | No change in response to this representation. |
|  | Policy H2/A15 | 5267 | Seek further clarification in Policy A15: Loxwood to emphasise importance of collaborative working between stakeholders to mitigate against the potential cumulative impact of development. | Criterion 10 of Policy A15: Loxwood, requires that development provides for infrastructure and community facilities in accordance with the most recent Infrastructure Delivery Plan (IDP).Schools, sixth form and libraries are cross boundary matters which have been considered by WSCC and incorporated into the IDP to ensure that the infrastructure demands of the Plan are met. CIL projects, including leisure projects, can include funding pro-rata from both Chichester and Horsham and would be kept under review through the Infrastructure Business Plan (IBP) process. | No change in response to this representation. |
| South Downs National Park Authority | Throughout plan |  | Use of terms ‘natural landscapes’ and ‘rural character’ be replaced with ‘landscape character’ for clarity, accuracy and consistency with evidence base and European Landscape Convention definition of landscape | On the basis that the ELC Article I Definition of Landscape is “an area as perceived by people whose character is the result of the action and interaction of natural and/or human factors”, it is not considered that the policy name is inconsistent with the European Landscape Convention Guidance.  | No change in response to this representation. |
|  | Objective 2 | 5128 | Amend to include reference to conserving and enhancing NP and its setting to reflect duty of regard in S62 of Environment Act 1995 and NPPF para 176 | Agree that reference should be made to the National Park and its setting. | Objective 2Amend end of second sentence to read: ‘…Compensatory Habitat, ~~and~~ protecting wildlife and landscape character **and conserving and enhancing the Chichester Harbour Area of Outstanding Natural Beauty and South Downs National Park and their setting**.’ |
|  | Paras 3.19 and 3.21 | 5129 | Add references acknowledging setting of NP | Agree that reference could be made to setting. | Paragraph 3.19Amend second sentence to read: ‘Opportunities for development in this area appear to be limited due to land availability, landscape considerations, **including the setting of the National Park,** settlement patterns and available infrastructure.’Paragraph 3.21Amend first sentence to read: ‘The north of the plan area covers those parts of Chichester District which lie north and eastof the South Downs National Park boundary **and includes its setting**.’ |
|  | Policy NE1 | 5136 | Add reference to views in and out of NP | Agree that reference could be added  | Policy NE1Add to first criterion:‘**views into and from the South Downs National Park and Chichester Harbour AONB;**’ |
|  | Policy NE2 | 5131 | Add additional criterion, or alternatively new policy, concerning conserving and enhancing NP and its setting and special qualities | A policy equivalent to Policy NE13 is not considered appropriate as there is a distinction to be made between the Chichester Harbour AONB which is in the Plan Area and the SDNP, which is outwith it. Reference to views and the setting of the SDNP is already made in criterion 1 of Policy NE2.To avoid duplication with Policy NE13 it is, however, proposed to delete criterion 5 of Policy NE2 | No change in response to this representation. |
|  |  | Clarification on LVIA requirements | Agree that the wording of the penultimate paragraph of Policy NE2 should be clarified to address the SDNPA comment regarding smaller developments. An amendment is proposed, which also addresses matters raised in representation from Natural England. | Amend penultimate paragraph of Policy NE2 to read:‘For ~~larger schemes~~ **largescale proposals** ~~in identified character areas~~, Landscape and Visual Impact Assessments (LVIA**s**) may be required. The LVIA should be used to identify**, describe** and assess the **likely significant** ~~significance of the~~ effects of **a project on the landscape (including the direct and indirect change to the landscape’s sensitivity, character and condition) as well as the visual amenity and visual receptors** ~~change resulting from the development on both the landscape as an environmental resource and on views and visual amenity~~. **Landscape and Visual Impact Assessments (LVIAs) may also be required for small-scale development proposed within the setting of the AONB or South Downs National Park.** Further guidance should be sought from the relevant Strategy, Management Plan or SPD and/or general national guidance. |
|  | Policy NE13 | 6261 | Should be an equivalent policy for the SDNP. | See response to representation 5131 above (Policy NE2) | No change in response to this representation. |
|  | H2/H3 | 51385139 | Concern over challenge to neighbourhood plan groups in delivering as many potential sites are likely to be in setting of NP. Will need to address requirements of NPPF para 176 on setting | See response to representation 5131 above (Policy NE2) | No change in response to this representation. |
|  | Paragraph 8.4 | 5144 | Not clear from Transport Assessment how expected increase in traffic on A286 towards Midhurst will impact on junctions in Midhurst and Rumbolds Hill AQMA. | The testing of the northern growth scenarios (Chichester Transport Assessment, January 2023) indicated that for the highest growth scenario, Midhurst would see an additional 7 trips in the AM peak and 5 trips in the PM peak. Further testing of the preferred distribution of housing in the northern plan area through an update to the Transport Assessment (2024) indicated that because of the relatively small numbers and the dispersed nature of the development, the additional trip numbers from the proposed development on the local and neighbouring highway network would be small.The Council’s evidence, therefore, demonstrates that any impacts on roads in Midhurst and the Rumbolds Hill AQMA would not be severe.  | No change in response to this representation. |
| West Sussex County Council[[25]](#footnote-25) | Policy H8 | 5094 | Should consider provision of extra care housing so not limited to certain age group | It is agreed to make a change to paragraph 5.43 to reflect that extra care provision is not only limited only to older age groups. | Before paragraph 5.43 add new sub-heading ‘**Extra Care Housing**’.Amend first sentence of paragraph 5.43 to read:‘**To help provide accommodation for those of different ages and with different support needs,** West Sussex County Council supports the provision of extra-care housing rather than traditional care homes.’ |
|  | Policy P14 | 5096 | Policy should take a more proactive positive approach that seeks enhancements to the network as mitigation | Objection and proposed change noted. Agree to minor modifications to the policy to emphasise that proposals for new development will be expected to provide integrated and enhanced active travel including PROW.  | Amend Policy Criteria 4 to read: “The proposals maximise opportunities to **enhance and** link to **active travel** ~~cycling and walking~~ routes, including **existing public rights of way as well as** multi-user routes.”  |
|  | Policy E3 | 5640 | Object: Land at Tangmere Apron unsuitable for horticultural use, consider allocating for housing. | Any formal proposals for amendments and deletions to the current HDAs received earlier on in the Local Plan Review process were considered and where appropriate, incorporated into the Local Plan versions prepared for the Regulation 18 and Regulation 19 consultations. At this stage in the local plan process, representations must be confined to legal compliance and soundness.  | No change in response to this representation. |
|  | Paragraph 8.1\* | 5085 | i) Insufficient evidence to demonstrate that key infrastructure (i.e. Terminus Road Diversion) will be deliverable. ii) Insufficient evidence to demonstrate capacity of transport network can accommodate scale of development proposed as part of Southbourne BLD. | i) Further evidence has been produced to inform Terminus Road diversion and to develop package of sustainable transport measures. Both of these matters will be further refined through the monitor and manage process.ii) Further survey work and evidence produced that supports scale of development proposed within BLD in relation to transport network. | No change in response to this representation |
|  | Policy T1\* | 5086 | Package of sustainable transport infrastructure and measures is not yet sufficiently well-developed to demonstrate that it is deliverable as part of the monitor and manage process.i) undertake further technical work to develop schemes and measures in sustainable transport packageii) As not all severely impacted A27 junctions have a reasonable prospect of being physically improved in Plan period, more investigation into potential public transport enhancements also required, particularly to strengthen routes that cross bypass. May require further amendments to the IDP.iii) Work should aim to identify options for sustainable transport schemes that can be a priority for investment, provide information to enable safeguarding of routes (e.g. cycle routes) from development and provide a basis for applications for third party funding to support their delivery. The relative priority of such measures would need to be considered under the monitor and manage approach by the proposed Traffic and Infrastructure Management Group for implementation in addition to the proposed improvement at the A27/A259 Fishbourne junction.iv) To address this issue and support delivery of the sustainable transport package, the County Council also recommends minor amendments to Policy T1 | i) The council is continuing to work on the identification of specific measures, improvements and initiatives as part of the monitor and manage approach. Prioritisation and further development of these schemes will be realised through the TIMG. ii) The work on the monitor and manage approach will consider the particular issue of routes crossing the Chichester Bypass especially in areas where junctions will not be upgraded during the Plan period. Where works are identified, they will be included within IDP and other relevant evidence.iii) Work on the monitor and manage approach (including through the TIMG) will consider sustainable transport measures which can be identified for priority investment, including from developer funding and including the need to safeguard land/routes to facilitate these works / initiatives.iv) Agree to make amendments to Policy T1.  | Amend Policy T1 (criterion 7) to read: ‘Delivering a coordinated package of infrastructure and other measures including sustainable transport improvements and ~~improvements to junctions on the A27 Chichester Bypass along with other small scale~~ junction improvements on the A27 Bypass, within the city and elsewhere, as identified through the monitor and manage process. These will increase modal choice, reducing the need to travel by car, result in freeing/creating capacity on both ~~road capacity~~ strategic and local roads ~~reduce traffic congestion~~, improve access to Chichester city from surrounding areas. |
|  | Policy T1 | 5097 | It is a positive step to see PRoW acknowledged as valued by communities and as part of the area’s green infrastructure. Whilst Policy P14 (Green Infrastructure) states that development proposals should not be detrimental to the network of public rights of way and bridleways (please note bridleways are Public Rights of Way), a more proactively positive approach that seeks enhancements to the network as mitigation, would be welcomed. The improvement, upgrading of existing PRoW and creation of new PRoW where possible, to allow for a greater number of users to access the network would be beneficial. This is somewhat addressed in Policy T1 which refers only to routes identified in the Local Transport Plan, Local Cycling and Walking Infrastructure Plan (LCWIP) and the Infrastructure Delivery Plan. Opportunities to these, should not be limited if they arise elsewhere. | The council agrees that opportunities to enhance existing or to create new PRoW links should not only be limited to these identified within the Local Transport Plan and Local Cycling and Walking Infrastructure Plan. The Infrastructure Delivery Plan references the need to upgrade and enhance a number of routes, as suggested by WSCC separately. Relevant active travel measures will also be considered by the TIMG. | No change in response to this representation. |
|  | Policy T3 | 5098 | Object: no mention of PRoW network which provides extensive walking and cycling opportunities and important links between places and non-PRoW routes. | Reference to PRoW will be incorporated into paragraph 8.24. | Add to end of Paragraph 8.24: “**The Public Rights of Way (PRoW) network provides extensive walking and cycling opportunities and important links between places in the local plan area**.”  |
|  | Policies A2/A7/A15/A21 | 5090509150925093 | Should refer to safeguarding of minerals and waste infrastructure. | Agree to add references in each of the policies and/or supporting text. | In Policy A2 replace criterion 12 with:‘**If a site is within the Minerals Safeguarding Area consider the implication of development on safeguarded minerals in line with the West Sussex Joint Minerals Local Plan (Policy M9) and the Minerals and Waste Safeguarding Guidance, to assess whether the land contains economically viable minerals that would require extraction prior to development to avoid permanent sterilisation.’**In Policy A2 add new criterion to read:‘**Consider the implication of development on safeguarded minerals and waste infrastructure in the vicinity to ensure development does not prevent or prejudice any waste management uses, as required by Policies W2 and W10 of the West Sussex Waste Local Plan or the operation of minerals infrastructure as required by Policy M10 of the West Sussex Joint Minerals Local Plan and the Minerals and Waste Safeguarding Guidance.’**In paragraph 10.26 amend last bullet point to read:‘Taking account of the West Sussex **Joint** Minerals **Local** Plan, **Waste Local Plan,** and associated guidance, in relation to the site being within a defined Minerals Safeguarding Area **and in close proximity to safeguarded waste infrastructure**.In Policy A7 amend criterion 12 to read:‘Proposals for the development should have regard to the West Sussex County Council Minerals Safeguarding Area, **safeguarded waste infrastructure** and associated guidance.’In paragraph 10.70 add new bullet point to read:‘**Account taken of the West Sussex Joint Minerals Local Plan, and associated Minerals and Waste Safeguarding Guidance, in relation to the sites within the parish being within a defined Minerals Safeguarding Area for clay.’**In Policy A15 add additional criterion to read:**‘If a site is within the Minerals Safeguarding Area consider the implication of development on safeguarded minerals in line with the West Sussex Joint Minerals Local Plan (Policy M9) and the Minerals and Waste Safeguarding Guidance, to assess whether the land contains economically viable minerals that would require extraction prior to development to avoid permanent sterilisation.’**After paragraph 10.94 add new paragraph to read:**‘The site lies within a Minerals Safeguarding Area, as defined by the West Sussex Joint Minerals Local Plan.’** |
|  | Paragraph 10.19/Policy A6 | 5088 | Should also refer to nursery and SEND provision | Agree to add references. | In paragraphs 10.19 and 10.20 after the words ‘teaching accommodation’ add: ‘**with nursery and SEND provision’**In the third bullet point of Policy A6 after ‘primary school’ add: ‘**to include nursery and SEND provision’** |
|  | Policy A8 | 5089 | Should refer to provision of two form entry primary school | Agree to make change requested. | It is proposed to amend paragraph 10.35 to clarify requirements.Amend second bullet point in paragraph 10.35 to read: ‘Making provision for a primary school, neighbourhood centre and other economic and social infrastructure. **Land for the primary school must meet the minimum recommended education space requirements for a two-form entry primary school;’** |
|  | Policy A13\* | 5087 | Insufficient evidence to demonstrate that capacity of the transport network can accommodate the scale of development proposed as part of the Southbourne BLD | The findings of the Council’s evidence indicates that there would be modest increases in journey times and only above 1,000 dwellings would travel time in a southbound direction be considered a material change. In terms of queue lengths, in the case of northbound traffic the results indicate that across all scenarios queue lengths would not extend to the A259/Stein Road junction. In respect of southbound traffic there would be some increase in queue lengths and the modelling undertaken indicates that beyond a certain amount of development a new rail bridge is likely to be of some benefit if the forecast traffic conditions cannot otherwise be mitigated by other traffic management measures i.e. additional road markings to help vehicles emerge from side roads onto Stein Road.In addition, as required by Policy T2 (Transport and Development) development at Southbourne will need to be supported by an appropriate Transport Assessment to look at the impacts in more detail. There will also be consideration through the Monitor and Manage process to consider any potential mitigation in the future. | No change in response to this representation |
|  | Policy A20 | 6193 | Support but want more flexibility to be written into policy.Provide up to 5 no. plots, with i) need to be determined at time of submission of planning application and ii) dependent on land required to satisfy biodiversity net gain and/or drainage requirements associated with commercial development;iii) More flexibility for amount of storage area associated with travelling showpeople plots. iv) Flexibility and requirement for an assessment in accordance with Policy H13 should be included in policy wording; v)A timescale for marketing of travelling showpeople plots following which it should revert to part of the commercial site. vi)Request more precise wording is included in criteria 10 and 11 so that expectations are clear. |  i) it is considered that the proposed amendment to only allow for ‘up to’ 5 plots would unduly weaken the policy requirement; the need for travelling showpeople plots is just as important as for employment land. However, an amendment is proposed to clarify that plots are only required to be provided if there remains an outstanding need for plots. This is necessary to ensure consistency with the other site allocation policies. ii) it should not be automatically assumed that plots should be removed on the basis of the need to address those issues. All of the relevant land use needs should be considered equally. iii) and iv) accept that specification for storage area of 1ha is overly prescriptive, as storage requirements often vary between different travelling showpeople sites, and propose to change wording to this effect. v) consider this is too detailed an issue to be fully covered in the policy and will need to be established at the time of relevant planning applications via a legal agreement. vi) Currently no more precise detail to include. | In first sentence after ‘travelling showpeople add: ‘**(if there remains a need for plots at the** **time of the determination of the planning application)**’Amend wording in first sentence to read: ‘…with **adequate** ~~1ha of~~ ancillary storage ~~requirements~~. |
|  | Transport evidence | 5095 | Public Transport and Park and Ride sections of transport study requires revisiting; conclusion at 8.4.4 re; A285 New Park Road/A286 St Pancras Rd Junction 7 only supported for pedestrians, not for cyclists, further measures required; layout at figure 7-8 for A286 Northgate Gyratory does not maximise opportunity to improve convenience and safety for pedestrians, scheme requires further development; approach at Fishbourne Road West/Appledram Lane South (Junction 11) location requires re-thinking; re- consider TEMPro Background Traffic Growth Comparisons; revise north of district spatial scenarios testing and methodology for Neutral Month and Summer Month Comparison Technical Note. | The Local Plan Transport Assessment has been updated and takes onboard the most recent and ongoing dialogue between the council, WSCC and National Highways. | No change in response to this representation. |
| Environment Agency | Policy NE5 | 4745 | Policy should include additional wording to:i) refer to Local Nature Recovery Strategiesii) provide a suitable buffer for water courses | i) Agree to amend Policy NE5 to include reference to LNRSs to ensure the policy is futureproofed. ii) Policy NE5 does not refer to buffers for other types of habitat. The proposed inclusion of a specific reference to watercourse buffers is considered an unnecessary change to ensure the soundness of the plan. | At end of second paragraph of Policy NE5 add “… protection and recovery of priority species populations. **Regard will be had to the Local Nature Recovery Strategy to inform opportunities for nature recovery.**” |
|  | Policy NE11 and paragraph 4.69 | 47514752 | Factual correction to name of compensation programme | Agree that amendment should be made. | Change ‘Regional Habitat Compensatory Programme’ to ‘Habitat Compensation and Restoration Programme’. |
|  | Policy NE12 | 4757 | Consider using Highest Astronomical Tide level rather than Mean High Water. Clarification of paragraph about replacement buildings may be needed. Inclusion of a new bullet point to encourage future relocation within property boundary if impacted by coastal erosion. | 1. Agree2. Wording has been revised to apply the same to new and replacement building.3. Additional reference is made to coastal erosion to ensure buildings are set sufficiently far back. | In the Policy replace the 3rd and 4th paragraphs with:**‘Around Chichester Harbour and Pagham Harbour new and replacement buildings should be setback in line with expected property lifetime and estimated undefended erosion rates (based on NCERM), and at least 25 metres from the highest astronomical tide to account for erosion and make space for nature, including floodable areas which could be returned to saltmarsh.** **Around the open coast, development should be setback at least 25 m from the landward edge of the existing or proposed sea defence or coast protection works, in order to prevent storm damage to buildings.**’ Delete the 6th paragraph starting “Replacement buildings”. |
|  | Paragraph 4.74 | 4759 | Clarification for 16m setback needed. | Agree to add clarification. | Amend the second and third sentences of paragraph 4.74 to read: “… landward side of **any sea** ~~the~~defences ~~it maintains~~. **A** ~~This~~ 16 metre strip of land is required for access for maintenance, **emergency works** and/or…” |
|  | Paragraph 4.90 | 4843 | Add reference to South East River Basin Management Plan | Reference to the management Plan is made in both this policy and NE11, and therefore it is considered that this issue has already been addressed and it is not considered necessary to also make additional reference to this in the supporting text. | No change in response to this representation. |
|  | Paragraph 4.96/Policy NE15 | 4841 | Propose various technical amendments to the policy, including: increasing the buffer to provide ‘additional benefits for biodiversity’; an amendment to point 4, which would ensure that the highest of the levels specified is what is actually used in the development; inclusion of an additional policy clause to address situations where there will be a loss of flood storage. | The additional buffer for biodiversity is not considered to be justified, particularly in relation to this policy, which is primarily targeted towards flood risk rather than biodiversity. However, for completeness Council agree to add the wording “including culverts” (as requested). Agree to include the replacement wording proposed in relation to point 4. With regard to the additional policy clause regarding flood storage, the Council notes that this is taken from the Planning Practice Guidance, and hence it seems most pertinent to only incorporate the key point rather than the whole of the guidance. | In 5th policy paragraph amend wording to read:“Elsewhere, new development should be set back at least 8m from fluvial watercourses **(including when within culverts)** …”In 4th point amend wording to read:“4. For vulnerable development, finished floor levels should be ~~no lower than~~**a** **minimum of whichever is higher of 300mm above the:****•** ~~300mm above~~ average ground level of the site**•** ~~300mm above~~ the adjacent road level to the building**•** ~~300mm above~~ predicted significant fluvial/tidal flood level (Fluvial 1 in 100 year / Tidal 1 in 200 year plus latest climate change allowances) for the lifetime of the development.”Add an additional clause (f):**“f. Where applicable, any loss of flood storage from any source of flooding in the fluvial floodplain is being should be compensated for on a level-for-level basis, ideally on-site. Compensation should be hydraulically and hydrologically linked to the floodplain, but not within it.”** |
|  | Policy NE16 | 4845 | Add additional criteria to Water Quality and Wastewater section on connecting to public mains sewer as first option and providing justification for not doing so | Agree additional criteria should be added. | Add a new paragraph after bullet g): “**Development shall connect to a public main sewer as the first option, and if that is not possible, provide justification for this and why a different solution is needed.**”  |
|  | Policy NE20 | 4850 | Additional wording to cover construction activities | Agree wording should be added. | Add fourth paragraph: “**During construction activities, pollution prevention measures should be taken on a development site including but not limited to: appropriate storage of hazardous substances; suitable management of surface water to prevent pollutants reaching watercourses and provision of equipment for containing spills.**” |
|  | Policies P1/P5/P14 | 485648584860 | Change reference to green infrastructure to green/blue infrastructure | Local Plan references to Green Infrastructure as an overarching term is consistent with terminology within the NPPF, Planning Practice Guidance and the Natural England Green Infrastructure Framework. The Local Plan Appendix J Glossary does, however, define Green and Blue Infrastructure as a multifunctional network of green and blue spaces.To ensure the inclusion of blue infrastructure is emphasised within Policies P5 and P14 agree to specifically reference blue infrastructure assets.  | Amend criterion 9 of Policy P5 to read:**‘**Proposals should contribute positively to ~~connecting existing~~ green infrastructure **networks, connecting existing green and blue infrastructure assets and spaces ~~corridors~~** and seek**ing** to create new ones;’Amend first sentence of Policy P14 to read: ‘Proposals for all new ~~residential~~ development (excluding householder applications ~~and replacement dwellings~~) will be expected … additional green **and blue** infrastructure, and the protection and enhancement of existing green **and blue** infrastructure;’ |
|  | Policy A6 | 4874 | Additional wording regarding provision of new culverts | Agreed that additional wording required in relation to culverts. Suggested wording has been summarised for policy purposes as the finer details such as exploring alternative approaches and design suggestions would be considered at the determination of any planning application.  | After bullet point 9 add new bullet point to read: “**Any new additional culverts are kept to an absolute minimum and designed in such a way so as to limit their impact on the watercourse;”**In criterion 12b add: “**Ensure new additional culverts are kept to an absolute minimum and designed so as to limit their impact on the watercourse;**” |
|  | Policy A10 | 4880 | Add refence to appropriate phasing of wastewater infrastructure | Agree that reference should be made. | Add additional criterion to read:**‘The development will need to be phased in such a manner to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements resulting from this development’** |
|  | Policy A15 | 4918 | Amend criterion 8 to refer to not increasing flood risk elsewhere | Agree to add reference to increasing flood risk but consider this would be more appropriate as an additional bullet point under paragraph 10.70. | Add additional point to paragraph 10.70 to read:‘**Development should not increase flood risk elsewhere, taking into account risks from all sources of flooding in accordance with Policy NE15.**’ |
|  | Policy A18 | 4921 | Amend wording to be clearer that development should not hinder or impact on the Thorney Island Habitat Creation Scheme | The Council acknowledges the importance of the habitat creation scheme and whilst there is already a requirement in the policy to support opportunities for habitat creation, the need to avoid impacting existing Habitat Creation Schemes has been inserted. A more detailed reference to the Environment Agency’s Scheme now appears in the policy pre-text.  | Change paragraph 10.78 as follows: “…Solent Waders and Brent Goose ecological network. **The Environment Agency are also developing a habitat creation scheme in partnership with the Ministry of Defence and Chichester Harbour Conservancy through managed realignment of the coast at the south-western edge of Thorney Island barracks. In addition,** ~~D~~**d**evelopment would ~~also~~ need to be compatible…”Change third paragraph of Policy to read: “All development proposals should seek to enhance the overall character of the Island as well as support opportunities for habitat creation **whilst avoiding adverse impacts on existing habitat creation schemes**. Proposals must **also** mitigate any adverse impacts on local infrastructure and ecology….” |
| Historic England | General |  | Comments on Reg18 Plan have largely been addressed or are now not likely to affect soundness of Local Plan. | No action required | None required. |
|  | Policies P9 – P13 | 59656183618461856186 | Policies for historic environment meet obligation for preparing positive strategy required by NPPF. Key tests of soundness and achievement of sustainable development as defined in NPPF in respect of elements that relate to historic environment have been met | No action required | None required. |
| National Highways[[26]](#footnote-26) | Paragraph 3.25 | 5283 | Acknowledge Plan has ruled out high growth in Kirdford, Wisborough Green and Plaistow and Ifold, but seek to understand the impacts and mitigation measures associated with the A27 | A transport assessment was undertaken to understand the impact of alternative growth options on the local highway network in the north east plan area and the network further afield, including the A27.Based on assessing the growth option proposing the highest level of growth (1,477 dwellings), the assessment found that trip increases on roads in Chichester, including the A27, were predicted to be minimal and would not materially impact the A27.A further transport assessment of the preferred distribution of housing in the northern plan area (July 2023) reinforced the findings of the earlier transport assessment. The most recent assessment indicated that because of the relatively small numbers and the dispersed nature of the development, the additional trip numbers from the proposed development on the local and neighbouring highway network would be small. | No change in response to this representation. |
|  | Policy NE15 | 5284 | Policy should reference SRN as development should not lead to surface water flooding on SRN | While the Council fully acknowledges the importance of preventing flooding of the strategic road network, it is considered that this amendment is not necessary in order to render the plan sound. The policy already includes a catch-all style clause concerning not increasing flood risk elsewhere which addresses the sort of issue envisaged in the comment. | No change in response to this representation. |
|  | Policy NE23 | 5285 | For sites positioned close to SRN, expect masterplans to minimise exposure to strategic traffic. Structures to be erected on the development land with maintenance able to take place without encroachment onto highway land.  | Paragraph 4.134 recognises that noise sensitive development proposals may be located in close proximity to transport and references noise impact assessments and good acoustic design informed by relevant guidance. Such matters will be determined on a case-by -case basis at planning application stage. | No change in response to this representation. |
|  | Paragraph 5.2 | 5286 | Seek to understand who would be responsible for funding and delivering transport related mitigation measures, if neighbouring and other authorities are unable to meet Chichester's unmet needs. | Comment noted. The Transport Infrastructure Management Group (TIMG) will consider the funding and delivery of mitigation. | No change in response to this representation. |
|  | Policy H1 | 5287 | Locating 84% of housing provision within the east-west corridor reiterates additional pressure on already congested road. Insufficient evidence of locations away from the A27. | The Housing Distribution Background Paper sets out the justification for the spatial distribution of housing growth, including how the potential for additional growth in the north of the plan area was considered. | No change in response to this representation. |
|  | Policy H2 | 5288 | The proposed developments are dispersed along the A27 corridor from Hermitage to the west of the city through to Tangmere in the east. We note that this has the potential to put pressures and traffic impacts on multiple A27 junctions rather than just one or two locations. | The overall spatial strategy seeks to locate the majority of development in locations which have access to a range of services and facilities, informed by the settlement hierarchy evidence. This has also been influenced by site availability and suitability, environmental and other constraints.The proposed modifications to Policy T1 Transport Infrastructure set out the council’s approach to securing transport mitigation to support the planned growth. | No change in response to this representation. |
|  | Policy H6 | 5290 | Seek to understand if the Council will utilise CEMP to manage and coordinate the activities of individual self-build builders, especially during the construction phase, to avoid, minimise and/or mitigate effects on the road environment. | The Council would indeed envisage that conditions or requirements in the s.106 agreement would manage and coordinate construction activities, including in relation to highways impacts. However, any highway impacts are likely to be extremely localised, generally restricted to activities within larger development sites or impacting the local road network, it is hard to envisage how this issue could affect the strategic road network. The Council consider that there is no necessity to include requirements in that regard within the policy, but are happy to include such wording if this is considered necessary by the Inspector.  | No change in response to this representation. |
|  | Policy H7 | 5291 | How will sites be included in an overarching monitor and manage policy which addresses cumulative traffic impacts of these and other sites and manages their collective impact on the A27 | Exception sites will be included within the proposed constrained housing figure and have therefore been included in transport modelling. | No change in response to this representation. |
|  | Paragraphs 5.41/5.42 | 52925293 | How will revenue funding be secured to maintain the long term viability of public transport in proximity of specialist accommodation for older people and those with specialist needs and how this may affect the viability of the overall sustainable transport package.Impacts arising from such developments and the funding of transport infrastructure modifications should be fully assessed at the planning application stage. | A number of the points referred to are the responsibility of others, including WSCC. As required by Policies T1 and T2, developments will be required to encourage the use of sustainable travel modes and contribute towards new or improved transport infrastructure. | No change in response to this representation. |
|  | Policy H8 | 5294 | Questions over number of facilities envisaged and locations, trip generation etc.  | Section 8 of the HEDNA (2022) considers the need for older people’s and other specialist housing. As required by Policies T1 and T2, developments will be required to encourage the use of sustainable travel modes and contribute towards new or improved transport infrastructure. | No change in response to this representation. |
|  | Policy H4 | 5295 | Affordable housing is especially pertinent on the Manhood peninsula, where National Highways note that caravan parks are seeking 365 days a year occupation. National Highways seek to understand further information about the anticipated traffic generation associated with such changes. | Most caravan parks on the Manhood Peninsula are for tourist accommodation and have limited occupancy. The council has no plans for these to be used for affordable housing, nor would that be appropriate in planning terms. There have been some applications to use tourist caravans as permanent accommodation, but not in large numbers. Consequently, the Council do not consider that there is likely to be any shift towards providing affordable housing via caravans on the Manhood Peninsula, and hence there would be no commensurate traffic implications.  | No change in response to this representation. |
|  | Policy H11 | 5296 | Does not acknowledge role of mobile housing or rise in nomadic and digital-nomad lifestyles and potential increase in additional vehicle movements on SRN or impacts. | The policy is focused on the accommodation needs of gypsies and travellers as people, rather than on particular forms of mobile accommodation per se. The wider needs of those living in caravans and houseboats is a legal requirement and the Council will be addressing this in an additional evidence base document, which will be available at the Examination. In terms of the impact of nomadic and digital nomad lifestyles, National Highways have not presented any evidence that such lifestyles are associated with the Chichester plan area or are having a significant impact on the strategic highways network and therefore it is difficult for the Council to address this issue.  | No change in response to this representation. |
|  | Policy P1 | 5298 | Objection on grounds policy 6 does not cover signage. No reference is made to the SRN or National Highways. It is a requirement of the LPA to consult NH on the road safety aspects of advertisements proposed alongside the SRN, for example adverts. | Policy P1 recognises safety as a design consideration. The reference and the overall policy is purposefully high level and it is not considered necessary to provide an explicit reference to road safety considerations in relation to signage in this policy. Moreover, this issue is addressed in paragraph 141 of the NPPF, and it is considered that there is no need to repeat those requirements in this policy.  | No change in response to representation.  |
|  | Policy P3 | 5299 | Support proposals to make the most efficient use of land but seek to understand how associated constraints (e.g. traffic generation and network capacity) will be assessed and reported. Also, need to understand how car-less or low-car would be managed – potential for outspill to impact SRN, with associated safety, freight and junction operation impacts | The policy is considered appropriate in terms of supporting efficient use of land and in so doing will support sustainable patterns of development which will be advantageous from a transport perspective. The council acknowledge that parking issues can be complicated in relation to higher density proposals. This will need to be considered on a site by site basis, and ultimately the issues raised will primarily be considered under the transport policies, particularly policy T4.  | No change in response to representation.  |
|  | Policy P4 | 5300 | Consideration should be given as to how new active travel links will integrate with the wider network including the existing A27 pedestrian and cycle footbridges and active travel routes along/intersecting the A27 corridor as important for reducing travel demand | Objection and comments noted. Policy T3 is focused on the provision of active travel, including expectations on new development to deliver well-connected cycling and walking routes, ensuring integration with wider networks. The supporting text for T3 reflects benefits including reduced demand on the road network. It is therefore considered unnecessary to duplicate these points within P4, which is principally concerned with design matters associated with development layout and access.  | No change in response to representation.  |
|  | Policy P14 | 5302 | Proposals should maximise opportunities to link with wider network including those associated with A27 | Objection and proposed change noted. i) Agree to modify Policy P14 to emphasise that proposals should provide integrated and enhanced active travel routes, and to clarify that strategic priorities (potentially including proposals to reduce demand on the A27) will be determined by the proposed Green Infrastructure Strategy. ii) Point 7 of Policy P14 states that management and maintenance of GI will be secured via planning obligation or legal agreement. Further clarification is therefore not considered necessary. | i) Modify Criteria 4: “The proposals maximise opportunities to **enhance and** link to **active travel** ~~cycling and walking~~ routes, including **existing public rights of way as well as** multi-user routes.” ii) No change in response to representation. |
|  | Policy P17\* | 5305 | Not only housing or employment that generate trips. How will it be demonstrated that new community facilities have no adverse traffic generation effects | This is covered by Policy T2, which refers to all development proposals which are likely to result in significant transport impacts needing to be supported by a transport assessment and travel plan. | No change in response to this representation. |
|  | Policy E2 | 5716 | How will unacceptable levels of traffic movement be assessed/monitored and cumulative traffic generated from multi occupancy businesses be monitored/managed | The criterion requiring proposals not to generate unacceptable levels of traffic movement has been carried forward from the adopted Chichester Local Plan. The Council will continue to assess/determine the requirements of this criterion on a site-specific basis. Proposals for new development will also be required to meet the criteria contained in the Transport policies of the Regulation 19 Local Plan including the provision of Transport Assessments, Travel Plans and Transport Statements where appropriate.  | No change in response to this representation. |
|  | Policy E5 | 5307 | How will servicing and customer traffic be accommodated on road network and impacts managed | Any planning application will consider the transport implications arising from any proposed development or redevelopment.  | No change in response to this representation. |
|  | Policy T1\* | 5309 | i) A27 improvements are necessary to increase capacity to accommodate current traffic levels, committed development and development allocated in the current local plan. The proposed Local Plan allocations will further exacerbate current issues. ii) Consent for the A27 Chichester bypass improvements project cannot be assumed. The potential use of Compulsory Purchase powers to deliver the scheme should be addressed. iii) National Highways will continue working with CDC and WSCC to progress interim mitigation measures and alternative transport measures while a long-term strategic solution is considered. This must be in combination with a robust monitor and manage policy/strategy. iv) The monitor and manage approach must address risk of unacceptable road safety impacts. At present, we do not consider the current strategy to be robust and we seek further information and detail especially on who, when and when monitoring and management will be undertaken. v) There is insufficient evidence that funding, partners, and relevant processes are in place to enable the delivery of infrastructure. Nor is there a realistic prospect that longer term investment can be secured within the timescales required. vi) We seek clarity on the role and remit of the TIMG. vii) The Plan does not appropriately acknowledge that all housing and employment development generates demand which may create additional SRN impacts; it unclear how developments will mitigate their own impacts.viii) Sustainable transport initiatives to supplement highway improvements are not evidenced in the Plan and so assumptions and assessment cannot be made.ix) National Highways seeks:a. evidence that Council and WSCC have: - an understanding of current and future pressures and constraints in the transport system; - identified when and where there is spare capacity;- strategies to redistribute demand to where there is spare capacity  b. the application of robust strategies, policies, and initiatives to; - manage travel demand more enduringly;- mitigate the impact of additional traffic generation; - ease recurring congestion; - better deal with planned or unplanned special events and tourism seasons; - support delivery of normal operations. c. to understand;- what initiatives would be most appropriate for proposed developments; - when and where initiatives would be delivered;- how they would be funded;- who would ultimately be responsible for the delivery of initiatives. | i) Both the Transport Assessment (2024) and the Proposed Submission Plan acknowledge that development proposed in the Plan plays a role in exacerbating the issues on the A27. Evidence has been shared with National Highways (NH) quantifying this role. ii) The council acknowledges that where necessary CPO powers may need to be used to deliver the necessary improvement works. The council has a strong track record of using CPO powers where all other land assembly options have been exhausted.iii) The council will continue to work with NH and WSCC and others where appropriate to progress the interim mitigation. Policy T1 provides a clear policy basis for the monitor and manage approach, with the detailed strategy and actions being developed through joint working with the council’s delivery partners.iv) The monitor and manage strategy will be focused on addressing the risks outlines by seeking to reduce demand on the A27 Bypass. NH will be aware that the detailed strategy and proposed actions are being developed through the on-going engagement between the council and its delivery partners including through the TIMG.v) The council is not the highway authority but is the Local Planning Authority and has accepted responsibility for securing developer funding that will be required in the continued absence of government funding. The council continues to work to secure government funding although it is acknowledged that this remains uncertain.vi) The role and remit of the TIMG will be developed and agreed through on-going work with NH and WSCC.vii) The Proposed Submission Plan acknowledges the role that all new planned development may have on the A27 Chichester Bypass in Strategic Objective 7 and in paragraphs 5.2 and 8.4. All relevant site allocation policies include requirements for specific transport mitigation to address local impacts and all new residential development would also be expected to pay the appropriate contribution towards strategic A27 mitigation through Policy T1.viii) Further details of the sustainable transport infrastructure improvements can be found in the Infrastructure Development Plan. However, the detailed strategy and proposed actions for the monitor and manage approach are still being developed through the on-going engagement between the council and its delivery partners.ix) Many of the points referred to are the responsibility of others, including WSCC. However, the council will continue to work with NH, WSCC and others to develop the evidence and strategies required to implement the monitor and manage approach and the securing of funding for this and the interim A27 mitigation works. | No change in response to this representation. |
|  | A27 mitigation contributions | 5311 | Developer contributions require updating to reflect increased costs (inflation, materials) and to ensure calculation methods reflect proposed strategic development; Proposed developments are at various stages of realisation; it is unclear if growth will be controlled in pace with the availability of funding and the delivery of necessary transport intervention;There is no one single development that is large enough to provide developer contributions to fund the required mitigations and so a change in direction will be required; All new housing and employment development increases the traffic on the local and strategic highway networks; Consideration should be given to collecting contributions from smaller developments (including 10 or fewer dwellings), not just strategic allocations.i) National Highways recommends that as a priority the Council: - reviews the 'Planning Obligations & Affordable Housing Supplementary Planning Document' SPD) which came into effect from February 2016 to reflect the proposed development in the Plan and the likely additional costs of construction associated with mitigation measures on the A27;ii) - considers the methodology to calculate contributions in relation to current day costs;iii) - reviews process to enable collection of contributions from all sites, including from smaller developers;iv) - increases the rate per dwelling so that the required infrastructure can be delivered and cost of monitoring is included. We acknowledge the work that has been done, and is being done, and we seek to continue to work with the Council, but we do seek information on the longer-term measures. v) National Highways recommend: - establishing what/which contributions could realistically come forward from developments; vi) - identifying what mitigation measures could reasonably be delivered from:a) existing contributions;b) expected contributions:vii) - understanding the overall deficit - preparing a business case for any identified shortfalls | i) The council is currently reviewing the relevant section of the 2016 Planning Obligations and Affordable Housing SPD and will share a draft of the new SPD text with National Highways as soon as possible.ii) The most up-to-date costs evidence is that set out within the Local Plan Transport Assessment (2024) and that will be used to support the setting of contributions. However, the council will continue to work with National Highways to keep the costs under review, through the TIMG.iii) The proposed contributions would be applied to all residential development coming forward (whether planned or otherwise) as set out in paragraphs 8.20 and 8.21 of the Plan (as modified). It is considered that applying contributions only to residential development will avoid ‘double counting’ impacts on the Strategic Road Network which would result from seeking contributions from employment, leisure or other types of development.iv) The proposed rate of contribution will reflect the latest available cost evidence and will be set at a level that would facilitate delivery of the agreed A27 mitigation works. The council would be pleased to discuss with National Highways what the likely costs of monitoring would be and whether these can be included within the proposed contributions, however it should be noted that the contribution level is constrained by the council’s viability evidence.v) The council has fully considered the impact that the proposed higher contribution level will have on the viability of development within the south of the district. This evidence is set out within the council’s Local Plan Viability Appraisals (Stage 2 – Jan 2023) which is available on the Local Plan webpage.vi) As stated in paragraph 8.21 of the Proposed Submission Plan, approximately £16 million in contributions have already been collected or are committed from permitted schemes or from the Strategic Development Areas that remain to be consented from the adopted Local Plan. Paragraph 8.21 also sets out the likely level of contributions that will be secured from the new Local Plan. The council will continue to engage with National Highways to identify and agree the most appropriate mitigation works to be funded.vii) The Local Plan Transport Assessment highlights that the costs of funding the full A27 mitigation works package, in the absence of government funding, would be prohibitive and this has led the council to propose a monitor and manage approach to seek to reduce overall demand on the A27 Chichester Bypass. However, the council will continue to work with National Highways and with WSCC to develop a convincing business case to secure funding from government to address the shortfall required to fund the full A27 mitigation works package as set out in the Local Plan Transport assessment. | No change in response to this representation. |
|  | Policy T2\* | 5312 | Focus for improving transport capacity should not be placed on road traffic. Developments generating significant movements should develop/deliver legally binding Travel Plan, co-ordinated across the area and enforced with financial penalties.  | i) The recommendation is noted and it is considered that Policy T2 will support the generation of the information sought through the requirement to provide Transport Statements and Transport Assessments. The Council will however be reliant on the Highways Authorities in each case to advise on the relevant likely scenarios and impacts for each of the developments.ii) This objective / recommendation is achieved through paragraph 2 of Policy T2. However, the Council must have regard to the National Planning Practice Guidance on the use of these measures and so will need to be proportionate in terms of the level of information required from each applicant and so the distinction between circumstances where a full Transport Assessment will be required and where a Transport Statement will be acceptable are considered appropriate.iii) Paragraph 113 of the NPPF sets out that travel plans should be required where proposals generate significant amounts of movement. However, it is acknowledged that paragraph 2 of Policy T2 is not drafted in a way that is fully consistent with this National Policy. Agree to a proposed modification to change paragraph 2 of Policy T2 to require a travel plan from all development which generate significant amounts of movements (consistent with NPPG).iv) This comment is noted and accepted, although it does not seek any change to Policy T2.v) as above.vi) The recommendations are noted, although it is not clear whether these points relate to travel plans or to conditions, or Section 106 agreements and further clarity from National Highways will be sought. As such, it is not clear on what aspect of Policy T2 the comment seeks a change. | Amend criterion 2 and 3 of Policy T2 as follows:Amend first sentence of criterion 2: ‘…a Transport Assessment ~~and Travel Plan~~.’Add new sentence at beginning of criterion 3 to read: **‘A Travel Plan will be required from all proposals for development which generate significant amounts of movement.**’ |
|  | Policy T3 | 5313 | Proposals should maximise opportunities to link with wider network including those associated with A27 | Criterion 1 of the policy requires integration with the wider networks. Policy I1 Infrastructure Provision refers to the Infrastructure Delivery Plan which identifies infrastructure requirements and costings including for the transport elements: walking and cycling. Monitoring and maintenance would be considered on a case-by-case basis at the planning application stage. | No change in response to this representation. |
|  | Policy I1 | 5314 | Plan should evidence who will fund, be responsible for and maintain improved accessibility to necessary facilities and services by sustainable travel modes from the outset as well as on an ongoing basis and into the future | As much information as the Council has at present is included within the Infrastructure Delivery Plan which accompanies this Local Plan. | No change in response to this representation. |
|  | Paragraph 10.1 | 5316 | Cannot cater for unconstrained traffic growth generated by new developments and therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source, more sustainable travel behaviour, net zero, reduce emissions and act on climate emergency. | Policy T1 has been developed to mitigate the impact of planned development on the Strategic Road Network. The Local Plan Transport Assessment (2024) explains the options that have been assessed and the reason the Council is proposing the specific improvements referred to in Policy T1. A key objective of policy T1 is to improve access to sustainable means of travel including public transport, walking and cycling across the Plan Area. The use of sustainable travel modes can be expected to reduce reliance on the private car and work towards achieving net zero in greenhouse gas emissions by 2050 as set out in Policy T2. | No change in response to this representation. |
|  | Policy A7 | 5319 | Seek further information regarding the provision of adequate mitigation for potential off-site traffic impacts on the A27, in particular for the Portfield and Oving Road junctions | Comments noted. Planning permission has been granted for the full allocation and the terms of the planning consents are available to view on the planning application portal of the council website. | No change in response to this representation. |
|  | Policy A6 | 5320 | Measures to provide consistency for transport assessment; list measures for mitigation fund for potential off-site traffic impacts. | Noted. The specific details are finalised at the planning application stage.  | No change in response to this representation. |
|  | Policy A19\* | 5331 | With proximity to A27 anticipated some of these end users are likely to be distribution type businesses. Need to know and understand impacts together with related mitigation measures. Ask for trip rates to be submitted to NH and once agreed, these are fed into the transport evidence base. | Comments noted. Site under construction. | No change in response to this representation. |
|  | Policy A20 | 5332 | Seek to understand what happens if realignment of Vinnetrow Road and works to Bognor Round roundabout is not delivered or cannot be funded. | Discussions with National Highways are ongoing. | No change in response to this representation. |
|  | Appendix F | 5334 | The monitoring should include how committed and completed schemes were funded, percentage of funding from developer contributions, government agencies and/or Council borrowing. It is critical how funding was gained can be tracked and recorded as part of updating the IDP.  | The IDP includes all information supplied to the Council and will be updated annually through the IBP process. The full breakdown regarding funding sources is unlikely to be known until the point of infrastructure delivery and even then, the Council may not be informed of the funding sources unless the Council is the infrastructure provider. The monitoring tool is the Infrastructure Funding Statement (IFS) which is produced annually and available on the Council’s website. The Exacom Public Facing Module accessed on the Council’s website provides an update each day in relation to what has been collected by the Council from S106 and CIL contributions. | Under section for Chapter 9 Infrastructure in the monitoring indicators column amend wording to read: ‘Record of infrastructure projects committed or completed **as recorded in the Infrastructure Business Plan (IBP) and Infrastructure Funding Statement (IFS)’.** |
|  | Paragraph 5.41 | 5335 | HEDNA states District has older age structure with the Manhood Peninsula having a particularly old population. Seek clarity on how these demographics are addressed in the Plan and their transport needs managed. | The housing policies seek to provide a wide mix of homes to meet the needs and demands of the Plan Area’s residents or through the provision of a range of specialist housing, which may include an element of care. As required by Policies T1 and T2, developments will be required to encourage the use of sustainable travel modes and contribute towards new or improved transport infrastructure. | No change in response to representation. |
|  | Open Space Study | 5336 | Notes that the Local Plan evidence on open space, sports facilities, recreation study and playing pitch strategy was completed June/July 2018 and has not been updated to address the changes in behaviours and increase in active transport participation during and since the COVID-19 global pandemic. | The study was undertaken specifically for this Local Plan. The study is in the process of being refreshed.Since the covid pandemic behaviours have gone back to what they were pre-pandemic. The access standards in table 6.3 are set by walking time ranging from 10 to 15 minutes. These are also minimum standards. | No change in response to representation. |
|  | IDP | 5338 | National Highways seeks to understand:* The Council’s strategy if developer contributions are insufficient;
* The Council’s governance associated with collected contributions and their use
* How developers will be charged if additional contributions are required.
 | It is recognised that improvements to all of the junctions on the A27 Chichester Bypass is simply unaffordable in the absence of government funding. Stantec, in discussion with the highways authorities is developing specific proposals that can be implemented through a monitor and manage approach, including review mechanisms and governance arrangements. The council are proposing a number of changes to Policy T1 and the supporting text to fully set out this approach. | No change in response to representation. |
|  | Transport Assessment\* | 5337 | Transport Assessment should provide further details on Monitor and Manage approach and require further detail on proposed safety led junction improvements and seasonal impact traffic management measures. | It is recognised that infrastructure costs will fluctuate over time but the work undertaken to inform the Local Plan Transport Assessment (2024) is proportionate and was undertaken in consultation with the highway authorities. Any new developer funding mechanism (such as a new SPD) will include an indexation provision to provide flexibility to respond to cost changes over time.Stantec, in discussion with the highways authorities is developing further specific proposals that can be implemented through the Monitor and Manage approach, including review mechanisms and governance arrangements. | No change in response to this representation. |
| Natural England | Vision | 5786 | Advise wording changes to bullet points 1 and 6 to refer to water scarcity/water supply respectively | Agree to amend wording or bullet point 1.No change to bullet point 6. The Vision is high level and the part about water supply seems to be too specific for that bullet with is referring to natural and cultural assets which make Chichester a good place for particular types of business. | In first bullet, after “high summer temperatures” insert “**water scarcity**” |
|  | Objective 2 | 5787 | Advise wording change to reference use of SuDS in managing run-off and further change to provide context for Policies NE16 and NE17 | Agree that additional wording on water neutrality should be added.No change in respect of comment about use of SuDS as this would be too detailed for high level objectives. | Amend final sentence of Objective 2 to read:~~All~~ **Where** relevant**,** developments will a~~lso~~ be nutrient neutral **and/or water neutral** to protect water quality. |
|  | Objective 6 | 5788 | Advise wording change to recognise importance of district’s protected landscapes | Agree | Add additional wording to end of first sentence to read:‘… blue infrastructure**.~~,~~ incorporating the special qualities of designated landscapes where required.** |
|  | Objective 7 | 5789 | Advise wording change to reference nature based solutions | Agree | Insert a new sentence at the end of the second paragraph: **“Nature based solutions will be used where these are appropriate.”** |
|  | Policy NE2 | 5791 | Policy is supported but advise should be more clearly articulated that Landscape and Visual Assessments need to also identify, describe and assess the likely significant effects of a project on the landscape. | Suggestion regarding providing further clarity in relation to the Landscape and Visual Impact Assessment is agreed. | Change penultimate paragraph to read: “**For large-scale proposals** ~~larger schemes in identified character areas~~, Landscape and Visual Impact Assessments (LVIA**s**) may be required. The LVIA should be used to identify, **describe** and assess the **likely significant**~~ce of the~~effects of ~~change resulting from the development~~ **a project** on ~~both~~ the landscape **(including the direct and indirect change to the landscape’s sensitivity, character and condition) as well as the** ~~as an environmental resource and on the views and~~ visual amenity **and visual receptors.** |
|  | Policy NE4 | 6109 | Support policy but suggest number of wording changes to strengthen policy | Support noted. Agree the inclusion of reference to the Draft Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol. Agree that wording surrounding local nature recovery strategies can be included. The policy will be modified to remove the sequential test part. | At end of paragraph 4.17 add:‘**Regard should also be had to the Draft Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol (2018) or any subsequent updated guidance.**’ Amend policy wording to read:‘Development **proposals within, or in close proximity to, strategic wildlife corridors, as shown on the Policies Map,** will only be permitted where **they can demonstrate they** ~~it~~ would not lead to an adverse ~~effect~~ **impact** upon the ecological value, function, integrity and connectivity of the strategic wildlife corridors**, and protects and enhances its features and habitats.** ~~Development proposals within strategic wildlife corridors will only be granted where it can be demonstrated that:~~1. ~~There are no sequentially preferable sites available outside the wildlife corridor; and~~
2. ~~The development will not have an adverse impact on the integrity and function of the wildlife corridor and protects and enhances its features and habitats.~~

~~Development proposals outside, but in close proximity to the strategic wildlife corridor will be acceptable where it can be demonstrated that:~~1. ~~The development will not have an adverse impact on the integrity and function of the wildlife corridor; and~~
2. ~~The proposal will not undermine the connectivity and ecological value of the corridor.~~

All proposals for new development (with the exception of householder applications) within or in close proximity to wildlife corridors should take opportunities available in order to extend and enhance those corridors.’ |
|  | Policy NE5 | 6110 | Support policy but suggest that reference should be made to preparation of an SPD | Advice and proposed changes noted. i) Agree to make a minor amendment to supporting text to include reference to the proposed production of guidance for developers in relation to BNG, reflecting proposed Plan Area-specific interim BNG implementation guidance, and anticipated country-wide guidance relating to LNRNsii) Agree to make a minor amendment to Policy NE5 to include reference to LNRSs to futureproof the Local Plan. | i) Add at end of para 4.22 “**Guidance for developers is provided (and will be updated as necessary) to inform development proposals and biodiversity plans**.”ii) At end of second paragraph of Policy NE5 add: “…protection and recovery of priority species populations. **Regard will be had to the Local Nature Recovery Strategy to inform opportunities for nature recovery.**” |
|  | Paragraph 4.28 | 5800 | Reference should also be made to inappropriate coastal management and resulting significant impacts including coastal squeeze. | Objection and proposed changes noted.i) Agree to change the supporting text to include reference to the Solent Maritime SAC to ensure it is comprehensiveii) Agree to change the supporting text at paragraph 4.28 to highlight the impact of inappropriate coastal management on designated habitatsiii) Agree to change Policy NE6 to reference policy NE12 and development requirements to mitigate coastal squeeze (proposed change also recorded against NE12 – see rep 6292) | i) Amend first sentence of paragraph 4.27 to read: “…the Arun Valley SAC and SPA, and the **Solent Maritime SAC and** Solent Coast SPAs….ii) Amend paragraph 4.28 to read: “Evidence demonstrates that there are ~~two~~ particular pressures on these harbours: nitrate pollution, **loss of intertidal habitat due to inappropriate coastal management,** and recreational disturbances impacting upon the designated bird populations.”iii) In Policy NE6 after point b) add new point c) and renumber subsequent points:**“c) Coastal Squeeze in Chichester and Langstone Harbours SPA and Ramsar, Solent Maritime SAC and Pagham Harbour SPA and Ramsar** **Development proposals on the coast at Chichester and Langstone Harbours and Pagham Harbour, including those relating to the shoreline management of harbour-fronting properties, have the potential to adversely impact the integrity of intertidal habitats as a result of coastal squeeze, and are therefore required to provide appropriate avoidance or mitigation measures in accordance with Policy NE12 (Development around the Coast)”**  |
|  | Policy NE6 | 5801 | Policy should be retitled to refer to international sites only | Objection and proposed changes noted. i) Agree to change policy title and content to ensure its focus is on internationally designated habitats onlyii) Agree to change policy to include a reference to the Arun Valley Ramsar siteiii) Agree to changes to policy and supporting text to ensure consistent references to Chichester and Langstone Harbours SPA are made.  | i) Change Policy title and section heading to “Chichester’s Internationally and European Designated Habitats” and amend first sentence of policy to read ‘…on internationally **and** European ~~and nationally~~ ~~important~~ **protected** habitat sites including:”ii) Amend point a) to: ‘Water neutrality in the Sussex North Water Resource Zone – Arun Valley SPA, SAC **and Ramsar’**iii) Amend point c of Policy NE6 to read: ‘…Zones of Influence for Chichester **and Langstone** Harbour**s** SPA, and Solent…’ |
|  | Policy NE7 | 5802 | Suggest number of changes to improve clarity of policy around loss of functionally linked land, recreational disturbance and application of avoidance/mitigation measures at screening stage | Objection and comments noted.i) Agree to modification to policy NE7 (as it relates to Pagham and Medmerry) to remove reference to LNR Management Plan within point a) to avoid confusion with mitigationsii) Agree to minor modifications to policy NE7 to expand references to loss or degradation of functionally linked land to improve clarity, including in relation to the separate consideration of this impact pathway from recreational disturbanceiii) Agree to consider a minor modification to paragraph 4.39 to improve clarity.iv) Agree to minor modification to Policy NE7 (as it relates to Pagham and Medmerry) to avoid contradiction of AA screening process.  | Modify Policy NE7 (Pagham) to remove reference to LNR Management Plan within point a).ii) Modify first paragraph of Policy NE7 (Chichester) to read:“**Recreational disturbance**It is Natural England's advice that all net increases in residential development, **either alone or in-combination with other developments**, within the 5.6km zone of influence are likely to have a significant effect on the Chichester and Langstone Harbours SPA **by means of recreational disturbance affecting bird species** ~~either alone or in combination with other developments~~and will need to be subject to the provisions of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).”Modify fourth paragraph of Policy NE7 (Chichester) to read: “**Loss or degradation of functionally linked habitats**The provisions of this policy do not exclude the possibility that **any development** ~~some residential~~ schemes either within or outside the zone of influence **may** ~~might~~require further assessment under the Habitats Regulations. For example, large schemes, schemes proposing bespoke or alternative avoidance/mitigation measures, or schemes that impinge on the supporting habitats identified by the Solent Waders and Brent Goose Strategy. Such schemes will be assessed on their own merits under Regulation 63 (Appropriate Assessment), and, subject to advice from Natural England. Where mitigation for any impact upon **functionally linked** ~~supporting~~habitats is required this should follow the guidance given in the Solent Waders and Brent Goose Strategy.”Modify fifth paragraph of Policy NE7 (Pagham) to read:"**Recreational Disturbance**Net increases in residential development, **either alone or in-combination with other developments**, within the 3.5km zone of influence are likely to have a significant effect on the Pagham Harbour **SPA by means of recreational disturbance affecting bird species** ~~either alone or in combination with other develoments~~and will need to be subject to the provisions of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).”Modify eighth paragraph of Policy NE7 (Pagham) to read:“**Other considerations**The provisions of this policy do not exclude the possibility that ~~some residnetial~~**any development** scheme either within or outside the zone of influence ~~might~~**may** require further assessment under the Habitats Regulations. For example, large schemes, schemes proposing bespoke or alternative avoidance/mitigation measures, or schemes proposing an alternative approach to the protection of the SPA and/or the Compensatory Habitat where there is survey or other evidence that the site is used as **functionally linked** ~~supporting~~ habitats by SPA species, including Brent Geese. Such schemes will be assessed on their own merits, under Regulation 63 (Appropriate Assessment), and subject to advice from Natural England.” iii) Modify paragraph 4.39 as follows: Modify paragraph 4.39 as follows: “**All** ~~D~~**d**evelopment **(not just residential or tourism related)** on or adjacent to these areas ~~can have an impact on~~**could potentially impact** the SPAs, separate ~~to~~and **in** addition~~al~~ **to** the impact of recreational disturbance”. iv) Modify sixth paragraph of Policy NE7 (Pagham) to delete first sentence. |
|  | Paragraph 4.47/Policy NE9 | 6111 | Suggest removal of reference to Appropriate Assessment | Agree to proposed amendment as suggested. | Last sentence of paragraph 4.47 to be removed. |
|  | Policy NE10 | 5805 | Policy could be strengthened by reference to green infrastructure, impacts on Nature Recovery Networks and biodiversity | Agree to suggested amendments. | At end of criterion 1 add: **and linking to green infrastructure**;Add to end of criterion 3: “**including biodiversity whilst avoiding any adverse impact upon Nature Recovery Networks**”. |
|  | Policy NE11 | 5806 | For completeness and clarity suggest additional supporting text wording and in policy reference to Environmental Improvement Plan | Agree to revise wording of paragraphs 4.65 and 4.66 and Policy NE11. | After the first sentence of paragraph 4.65 add: “**Much of this loss is due to hard coastal defences that constrain natural processes, habitats moving landward as sea levels increase, particularly in response to climate change – this is known as coastal squeeze.**’Amend existing second sentence of paragraph 4.65 to read: “… breeding bird species, **due in part to habitat loss and disturbance** …”.Amend second sentence of paragraph 4.66 to read: ‘Natural England is working with a number of partners including **Chichester Harbour Conservancy,** the Environment Agency, the council and Southern Water~~many of which are outside of the planning system and as such not dependent on Local Plan policies~~ **and not all actions to be implemented are linked to Local Plan policies.’**At end of paragraph 4.66 add: **“The Government’s national** [**Environmental Improvement Plan**](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1168372/environmental-improvement-plan-2023.pdf) **published in early 2023 which sets out targets and actions for restoring nature, and the benefits it provides to protect 30% of our land and sea for nature by 2030**.’In Policy NE11 at end of first paragraph add: **“Undeveloped areas of low lying land around Chichester Harbour are prioritised for opportunities that actively restore coastal habitats of work with natural processes to address climate impacts and loss of biodiversity.”**In first bullet point of Policy NE11 after ‘wetland habitats’ add: ‘**to help meet the 30 by 30 targets set out in the Environmental Improvement Plan (2023)**.’ |
|  | Policy NE12 | 5818 | Clarification to supporting text that new caravan/camping sites in coastal locations will not result in creation of new defences, clarification to wording of policy requirements or inclusion of additional requirements | Revised wording agreed. | At the end of paragraph 4.76 add **“The National Coastal Risk Management work of the Environment Agency4 is also a consideration, particularly around Chichester Harbour where setting back development can make space for nature and floodable areas.”****4** [National Coastal Erosion Risk Mapping (arcgis.com)](https://www.arcgis.com/apps/webappviewer/index.html?id=9cef4a084bbb4954b970cd35b099d94c&marker=636394.9963403749%2C332466.006489025%2C27700%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22x%22%3A636394.9963403749%2C%22y%22%3A332466.006489025%2C%22wkid%22%3A27700%2C%22isIncludeShareUrl%22%3Atrue%7D&level=16)In the Policy replace the 3rd and 4th paragraphs with:**‘Around Chichester Harbour and Pagham Harbour new and replacement buildings should be setback in line with expected property lifetime and estimated undefended erosion rates (based on NCERM), and at least 25 metres from the highest astronomical tide to account for erosion and make space for nature, including floodable areas which could return to saltmarsh.** **Around the open coast, development should be setback at least 25 m from the landward edge of the existing or proposed sea defence or coast protection works, in order to prevent storm damage to buildings.**’ Delete the 6th paragraph starting “Replacement buildings”.In criterion 1: replace “associated European designated sites” with “integrity of European sites.” Add new criterion 2: “**Development would not result in or exacerbate coastal squeeze of any designated site or prevent managed realignment necessary to protect these sites**”.Amend original criterion 2 to read: ~~The development provides recreational opportunities, that do~~ **Development does** not adversely affect the character, environment and appearance of the coast and Chichester Harbour AONB**.** ~~Or result in adverse effects of integrity to European designated wildlife sites.~~At end of original criterion 6 add: “**whilst also ensuring that any small scale loss of mudflat within the designated sites is compensated for**.”After original criterion 7 add two new criteria: “**The development can demonstrate consideration of and adaptation to future climate scenarios and their potential impacts, including, but not limited to, shading, surface water flooding, erosion, wind blown sand, wave driven shingle; and**.” “**The development does not hinder coastal processes with regard to designated sites.**” |
|  | Policy NE12 | 6292 | Coastal management and coastal squeeze should be covered in the policy  | Agree to inclusion of additional wording.  | See response above regarding inclusion of new criterion 2. |
|  | Policy NE14 | 6123 | Suggest factual correction to supporting text and addition of reference to Nature Recovery Networks in policy | Agree to correct references to the Chichester and Langstone Harbours SPA/Ramsar site and to add reference to the potential contribution that proposals may make to nature recovery networks. | Change reference at second bullet point at 4.84 to read “Chichester **and Langstone** Harbour**s** **~~SAC/~~**SPA/Ramsar site**~~s~~**”. In Policy criterion 4 after ‘ecology’ add: **‘including the potential to contribute to any nature recovery networks)** …’ |
|  | Policy NE16 | 5824 | Suggest strengthening wording, signposting to guidance on delivering water efficiency and also including Pagham Harbour in policy | The policy already describes 110lppd as a maximum and encourages lower water use. Reference to the Water Efficiency Strategy will be added to the supporting text. | Insert at the end of paragraph 4.98: “**The Waterwise UK Water Efficiency Strategy to 2030 provides additional guidance on delivering water efficiency in the UK by 2030**“ |
|  | Paragraph 4.108 | 5826 | Could improve clarity by stating which aquifer is specifically being impacted by the Pulborough abstractions. | Agree suggested change would be beneficial.  | Amend second sentence of paragraph 4.108 to read:“The WRZ is supplied by the Pulborough groundwater abstraction site, **abstracting from the Folkestone beds of the lower greensand/Wealden greensand semi-confined aquifer.”** |
|  | Paragraph 4.109 | 5827 | Could add wording to clarify that achieving water neutrality is one of the most readily available methods to rule out an adverse effect on integrity. | Agree suggested change would be beneficial.  | Amend fifth sentence of paragraph 4.109 to read:‘… on the sites. **The most feasible method** to achieve this **is to require that** development must be water neutral...” |
|  | Paragraph 4.110 | 5830 | As the final strategy is not out yet, advise paragraph should either include some discussion as to why achieving 85lppd is critical or make direct reference to discussion in Part C strategy. | Agree suggested change would be beneficial.  | Add new sentence after third sentence of paragraph 4.110 to read:“…water issue category. **Achieving these higher levels of efficiency will enable the strategy to provide necessary offsetting more effectively, thereby reducing offsetting costs and ensuring viability for development within the WRZ.** This may ..." |
|  | Policy NE17 | 5831 | Suggest additional wording to supporting text to improve clarity and amendment to Policy requirement 4 to make clear delivery of an alternative water supply will be certain for lifetime of the development. | Agree suggested change would be beneficial.  | Amend existing policy requirement 4 to read:“4. Where an alternative water supply is to be provided, the **Water Neutrality** statement will need to demonstrate that no water is utilised from sources that supply the Sussex North WRZ. The **wider** acceptability ~~of~~ **and uncertainty of delivery for** alternative water supplies will be considered on a case-by-case basis.” |
|  | Policy NE19 | 5841 | Supporting text should be expanded to make clear what information relevant developments will be expected to provide, clarify that there may be individual cases (other than those involving overnight accommodation) that could have water quality implications and signpost to additional guidance. | Information requirements will be set out in the local list.The impact of other uses on water quality is be covered by Policy NE16 – although changes in agricultural practice are outwith the planning system. Additional guidance will be added to the Nutrient Neutrality page the council website.  | In paragraph 4.121 insert after “overnight stay”: “**Where other types of development have an impact on water quality this can be considered under policy NE 16**.” After “other information” insert “**and guidance**”. After “to accompany applications” insert “**And Natural England’s Framework for Responding to Wetland Mitigation Proposals**”In policy NE 19 insert new second paragraph “**Where wetlands are used as mitigation they should be designed using the Framework Approach for Responding to Wetland Mitigation Proposals**.” |
|  | Policy H13 | 6127 | Suggest additional wording to clarify new pitches will be expected to contribute to relevant access management strategies | Agree with inclusion of suggested wording but consider that as this should apply to all pitch provision, not just that which comes forward on non-allocated sites, it would be more appropriate to include it in Policy H11.  | At end of Policy H11 add new paragraph:‘**In all cases, proposals for gypsy, traveller and travelling showpeople’s accommodation are expected to contribute to relevant access management strategies to mitigate recreational disturbance to SPAs in accordance with Policy NE6 (Chichester’s Internationally and European Designated Habitats), and Policy NE7 (Development and Disturbance of Birds in Chichester, Langstone and Pagham Harbours and Solent and Dorset Coast SPAs, and Medmerry Compensatory Habitat).’** |
|  | Policy E3 | 5856 | Appears to be overlap between Runcton HAD and its proposed extension with one of the proposed strategic wildlife corridors. Supporting text should clarify how the two designations will interact. | The Runcton HDA extension will be amended so that it falls outside of the Strategic Wildlife Corridor. Criterion 9 of policy E4 provides for consideration of a proposal’s impact upon the Strategic Wildlife Corridors. However, the policy will be strengthened with regard to the protection of the Strategic Wildlife Corridors. | Amend paragraph 7.24 ii and Policy E3 to refer to 21 hectares within the Runcton HDA extension and amend the boundary on the Policies Map to reflect the exclusion of the eastern parcel of land covered by a Strategic Wildlife Corridor.Amend the last sentence in criterion 9 of policy E4 to read: “The proposal **enhances and protects the Strategic Wildlife Corridors and** ensures the impact of development on the strategic wildlife corridors has been minimised, including through….Insert “**strategic wildlife corridors**” after “wildlife” in final paragraph of policy E4. |
|  | Policy E4 | 6128 | Large scale developments should be required to submit a Landscape and Visual Impact Assessment. | The final paragraph references the importance of the natural landscape policy. However, some changes have also been made to criterion 5 in relation to the landscape comments.  | Amend Policy Criterion 5 to read: “The height and bulk of development, either individually or cumulatively, does not **have a significant adverse effect upon ~~damage~~** the character or appearance of the surrounding countryside, **landscape or setting of the SDNP** and mitigation measures are included…” |
|  | Policy E9 | 5860 | Policy requirement 9 should apply to all new caravan and camping sites and intensification/alterations to existing sites and should be strengthened and brought in line with the wording used in Policy E8. | Suggested change is noted and it is proposed that criterion 2 from Policy E8 is carried forward to Policy E9 with criterion 9 of Policy E9 retained. | After Policy criterion 5 add: “**They are located so as not compromise the essential features of internationally and nationally designated areas of landscape, historic environment or nature conservation protection, including impacts from visitors or users of the facilities, particularly in relation to the potential for increased recreational pressures on Chichester Harbour, Pagham Harbour, Medmerry Compensatory Habitat and other designated sites;**”.  |
|  | Policy A8 | 5868 | Seek clarification as to whether strategic wildlife corridor has been narrowed to accommodate development. | Comment noted. This comment appears to relate primarily to the Westhampnett-Pagham Strategic Wildlife Corridor. See response to representation 6109 (Policy NE4) | No change in response to this representation. |
|  | Policy A12 | 6010 | To better reflect the mitigation hierarchy, recommend wording of criterion 10 be amended. | It is agreed that the wording of the criterion should be clarified as suggested. | Amend the wording of criterion 6 to read: ‘~~Successfully mitigate potential impacts~~ **Avoid, and if necessary, mitigate any** **adverse effects** on the Chichester Harbour SAC/SPA/Ramsar, including …’ |
|  | Policy A13 | 6011 | To better reflect the mitigation hierarchy, recommend wording of criterion 10 be amended. | It is agreed that the wording of the criterion should be clarified as suggested. | Amend wording of criterion 10 to read: ‘~~Provide mitigation to ensure the avoidance of~~ **Avoid, and if necessary, mitigate any** adverse effects on the SPA, SAC and Ramsar site at Chichester Harbour …. ‘ |
| Hampshire County Council | Policy T1 | 5588 | Transport studies do not give assessment of highway impact on A259 or other routes within Hampshire. Insufficient evidence to provide full understanding of scale of impact on local highway network in Hampshire or to say that not a severe impact.Proposed mitigation in transport studies focuses on highway capacity improvements along the A27 corridor within Chichester district. There is no mitigation proposed on the Hampshire highway network, including continuation of Chem route into Hampshire. | The impact of the Chichester Local Plan and the Southbourne BLD on the A259 and relevant junctions in Hampshire is set out in a Technical Note (January 2024) prepared by the Council’s highway consultants Stantec. The Technical Note considers the impact of the Local Plan, both with and without mitigation, on the A259 and the A259/North Street junction in Emsworth and A27 Warblington Interchange. Using the Chichester Area Transport Model (CATM) the analysis indicates that both junctions operate within capacity under all scenarios. The Technical Note also addresses comments subsequently raised by Hampshire County Council that junction capacity assessments for a proposed development in Southbourne had identified that sections of the Warblington Interchange were operating over capacity. The Technical Note makes clear that there is a difference between the Local Plan modelling that provides a strategic view of the cumulative impacts of development within the study area, particularly Chichester district, and the modelling undertaken for a standalone development using specific junction modelling software. Developers would in any case be required to undertake their own Transport Assessment to identify local impacts and measures to mitigate them appropriately prior to planning consent.Notwithstanding this, the Technical Note provides some comparative analysis and identifies that there is the potential for the Local Plan to exacerbate the existing capacity issues at the Warblington Interchange and for substantial flows to be added to the A259 Emsworth roundabout (if mitigation provided by the Fishbourne roundabout improvements is not implemented). However, as required by Policy T2 (Transport and Development) development at Southbourne will need to be supported by an appropriate Transport Assessment to look at the impacts on these junctions in more detail. There will also be consideration through the Monitor and Manage process to consider any potential mitigation in the future.The Havant LCWIP identifies a corridor which could extend the ChEm route into and beyond Emsworth (LCWIP route 270). As recognised in the Chichester IDP and Statement of Common Ground with Havant Borough Council there may be potential to deliver this through the Havant Local Plan.CDC are preparing a Statement of Common Ground with HCC. | No change in response to this representation. |
|  | Policy A13 | 5589 | Transport studies do not state how highway impact of proposed Southbourne settlement hub was assessed and whether this included an assessment of the A259 corridor into Hampshire | The impact of the Chichester Local Plan and the Southbourne BLD on the A259 and relevant junctions in Hampshire is set out in a Technical Note (January 2024) prepared by the Council’s highway consultants Stantec. The Technical Note considers the impact of the Local Plan, both with and without mitigation, on the A259 and the A259/North Street junction in Emsworth and A27 Warblington Interchange. Using the Chichester Area Transport Model (CATM) the analysis indicates that both junctions operate within capacity under all scenarios. The Technical Note also addresses comments subsequently raised by Hampshire County Council that junction capacity assessments for a proposed development in Southbourne had identified that sections of the Warblington Interchange were operating over capacity. The Technical Note makes clear that there is a difference between the Local Plan modelling that provides a strategic view of the cumulative impacts of development within the study area, particularly Chichester district, and the modelling undertaken for a standalone development using specific junction modelling software. Developers would in any case be required to undertake their own Transport Assessment to identify local impacts and measures to mitigate them appropriately prior to planning consent.Notwithstanding this, the Technical Note provides some comparative analysis and identifies that there is the potential for the Local Plan to exacerbate the existing capacity issues at the Warblington Interchange and for substantial flows to be added to the A259 Emsworth roundabout (if mitigation provided by the Fishbourne roundabout improvements is not implemented). However, as required by Policy T2 (Transport and Development) development at Southbourne will need to be supported by an appropriate Transport Assessment to look at the impacts on these junctions in more detail. There will also be consideration through the Monitor and Manage process to consider any potential mitigation in the future.CDC are preparing a Statement of Common Ground with HCC. | No change in response to this representation. |
| Surrey County Council | General |  | Have reviewed the document and have no comments to make. Supportive of the general strategy set out within the proposed transport policies, which prioritises sustainable modes of transport. | Comments noted. | None required. |

# Appendix 3: Water neutrality meetings

| **DtC Body** | **How engaged** | **When engaged** | **What issues engaged** | **Why engaged** | **Summary of key outcomes/current position** |
| --- | --- | --- | --- | --- | --- |
| **Water Neutrality** |  |  |  |  |  |
| **Defra meeting** | DEFRA; DLUHC; Natural England; Environment Agency; Ofwat; Horsham District Council; Crawley Borough Council; Southern Water | 7 April 2022 14 April 2022 6 May 2022 8 June 2022 27 June 2022 4 August 2022 18 August 2022 22 November 2022 | * Water Neutrality
* Implications for developments
* Water Efficiency standards for new developments
* Water Resource Zone Map
 |  | Discussions at government levels and across departments raising the issues, sharing evidence and considering resources, opportunities and solutions. Consistent Map of Sussex North Water Resource Zone for all organisations. |
| Water Neutrality Executive Board | DEFRA; DLUHC; Natural England; Environment Agency; Ofwat; Chichester District Council; Horsham District Council; Crawley Borough Council; Mid Sussex District Council; South Downs National Park Authority; West Sussex County Council; Southern Water | 8 November 202112 November 2021 30 November 2021 6 December 202120 January 202218 February 202225 April 2022 22 June 2022 22 July 2022 23 September 2022 27 October 2022 8 December 202220 February 202317 April 202319 June 202311 September 202316 October 202311 December 202326 February 202422 April 2024 | * Water Neutrality
* Water Neutrality Strategy
* Water Neutrality Offsetting Scheme
 |  | Approved Water Neutrality Strategy (Part C) – agreed by Executive Board on 27 October 22 Water Neutrality Strategy Endorsed by Natural England on 24 November 2022Appointment of Joint Water Neutrality Project Officer postJoint Response to Water Resources South East Regional Plan consultationJoint SoCG |
| Water Neutrality Lead Officer Group (WNLOG) | Chichester District Council; Horsham District Council; Crawley Borough Council; Mid Sussex District Council; South Downs National Park Authority; West Sussex County Council; Natural England | 1 October 202122 December 202128 January 202213 April 202211 May 20228 June 202213 July 202210 August 202214 September 202212 October 20229 November 2022 5 December 2022 11 January 20238 February 20231 March 20235 April 20233 May 20237 June 20235 July 20232 August 20236 September 20234 October 202311 November 20236 December 202310 January 202425 January 2024 (with Defra and DLUHC)7 February 20246 March 20243 April 2024 | * Water Neutrality Study
* Water Neutrality Offsetting Implementation
* Governance
 |  | Water Neutrality Strategy Part B (April 2022) Water Neutrality Strategy Part C (November 2022)Governance Structure (agreed 5 April 2022)Appointment of Joint Water Neutrality Project Manager post (Job Description meeting: 5 April 2022; Interviews: July 2022 and December 2022): started January 2023 |
| Water Neutrality Policy Group | Chichester District Council; Horsham District Council; Crawley Borough Council; Mid Sussex District Council; South Downs National Park Authority; West Sussex County Council (Input into Water Neutrality Study from Natural England, Environment Agency, Southern Water, Arun and Waverley) | 30 November 202016 December 202017 December 202015 September 202122 November 202129 November 202116 December 202112 January 20229 February 20229 March 202210 March 202230 March 20227 April 202221 April 20225 May 202219 May 202216 June 202230 June 202214 July 202217 August 202225 August 20221 September 20226 September 202212 September 202213 September 202228 September 202229 September 202211 October 202219 October 20223 November 20229 November 202211 November 202215 November 202210 January 20237 February 202328 February 20238 March 20234 April 20232 May 20236 June 20234 July 20231 August 20233 October 202331 October 20235 December 20239 January 20246 February 20242 April 2024 | * Habitats Regulations Assessments
* Water Neutrality Study and consultant’s appointment and liaisons
* Assessing measures and technical feasibility to achieve water neutrality.
* Circulation of Brief/ draft Documents.
* Request of input from other authorities and organisations.
* Water Neutrality Policy
* Water Neutrality Joint PINs Advisory meeting
* Sustainability Appraisal
* Combined Housing Trajectories and development phasing
* Local Plan and Water Neutrality Studies Consultations
 |  | Water Neutrality Strategy Parts A (July 2021)Water Neutrality Strategy Part B (April 2022)Water Neutrality Strategy Part C (November 2022)Joint Local Authorities PINs Advisory Meeting: Water Neutrality (6 September 2022)Water Neutrality Workshops (March 2022)Joint Policy wordingJoint Sustainability Appraisal approachJoint Topic Paper (May 2023) |
| Water Neutrality Development Management Group | As above | Meet once a month | * Shared Development Management issues
* FAQs
* Responses to Developers and Applicants
* Responses to suggested offsetting solutions
 |  | Natural England Arun Valley SPA/SAC Appropriate Assessment Workshop (22 September 2022) |
| Water Neutrality Offsetting Implementation Group | As above | 16 November 202214 December 202211 January 20231 March 202315 March 20235 April 20233 May 20237 June 20235 July 202319 July 20232 August 20234 October 20231 November 20236 December 202320 December 20237 February 20246 March 202417 April 2024 | * Offsetting schemes and approaches
* Timing and delivery of implementation scheme
* Project management
 |  | Emerging Business PlanPilot Offsetting Retro-Fitting Schemes |

1. Last updated February 2023 [↑](#footnote-ref-1)
2. The NPPF was last updated in December 2023 but under the transitional arrangements the Local Plan will be examined under the relevant previous version of the framework. [↑](#footnote-ref-2)
3. Through inclusion of Section 33A into the Planning and Compulsory Purchase Act 2004. Schedule 7 of the Levelling Up and Regeneration Act 2023 will repeal the Duty to Cooperate but is not yet in force and it remains a policy requirement of the NPPF [↑](#footnote-ref-3)
4. Through inclusion of Section 20(5)(c) into the Planning and Compulsory Purchase Act 2004 [↑](#footnote-ref-4)
5. Paragraph 3.5, Procedure Guide for Local Plan Examinations, Planning Inspectorate, (8th edition). Last updated 10th February 2023 [↑](#footnote-ref-5)
6. Prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 [↑](#footnote-ref-6)
7. Section 33A(4) into the Planning and Compulsory Purchase Act 2004 [↑](#footnote-ref-7)
8. The area covered by the Chichester Local Plan excludes that part of Chichester District covered by the South Downs National Park [↑](#footnote-ref-8)
9. The West Sussex CCG closed on the 1 July 2022 with NHS Sussex taking over the role of agreeing the strategic priorities and resource allocation for all NHS organisations in Sussex. [↑](#footnote-ref-9)
10. Formerly Highways England [↑](#footnote-ref-10)
11. Following the Government’s decision to withdraw funding for LEPs from April 2024, Coast 2 Capital agreed in November 2023 to end the statutory functions of the LEP at the end of March 2024. At this time the LEP’s functions will transfer to relevant upper tier authorities, including WSCC. [↑](#footnote-ref-11)
12. WSCC’s representation clarifies that in their response to the Regulation 19 Local Plan, only three of the representations made relate to the soundness of the Local Plan. [↑](#footnote-ref-12)
13. National Highways subsequently clarified in July 2023 that with the exception of five representations, their response to the Regulation 19 Local Plan should be treated as predominately seeking additional information on aspects of the Local Plan. [↑](#footnote-ref-13)
14. These are also included in the Council’s suggested modifications schedule. [↑](#footnote-ref-14)
15. The list is up to date at the time of the publication of this Statement. All SoCG are published on the Council’s website when finalised. [↑](#footnote-ref-15)
16. Defining the HMA and FEMA (February 2017), GL Hearn for the Greater Brighton and Coastal West Sussex Strategic Planning Board. Available at [https://www.adur-worthing.gov.uk/media/Media,147057,smxx.pdf](https://www.adur-worthing.gov.uk/media/Media%2C147057%2Csmxx.pdf) [↑](#footnote-ref-16)
17. As above [↑](#footnote-ref-17)
18. The Transport Background Paper sets out in more detail the transport evidence work undertaken including that to address representations made to the Regulation 19 Local Plan [↑](#footnote-ref-18)
19. The ‘monitor and manage’ approach is based on identifying a package of potential highway improvements (including enhanced walking, cycling and public transport) which will be implemented following a monitoring process that will define the actual demand on the network and the requirement for the schemes. [↑](#footnote-ref-19)
20. Following a formal request in February 2018 from the SDNPA to consider accommodating some, or all, of the unmet housing need. [↑](#footnote-ref-20)
21. East Hampshire DC undertook a consultation on Issues and Priorities (under Regulation 18) from December 2022 to January 2023. This included a question on whether the unmet housing needs of neighbouring authorities should be accommodated by East Hampshire [↑](#footnote-ref-21)
22. Subsequently confirmed through DtC liaison meeting that in early stages of plan preparation and still investigating options but clear that meeting own needs will be challenging and therefore unlikely to be able to meet additional needs from CDC. [↑](#footnote-ref-22)
23. Chief Executive Board (meet every 6-8 weeks); Lead Officer group (meet monthly); Development Management and Policy groups (meet monthly); Offsetting Implementation group (meet twice a month). [↑](#footnote-ref-23)
24. Within the Plan Area these are the Chichester and Langstone Harbours Special Protection Areas [↑](#footnote-ref-24)
25. WSCC’s representation clarifies that those representations marked with a \* relate to the soundness of the Local Plan. For completeness all of WSCC’s representations concerning the Regulation 19 Local Plan are included (other than those of support). [↑](#footnote-ref-25)
26. National Highways confirmed that those representations marked with \* are matters to be addressed or issues to resolve. The remainder should be considered as comments seeking further information or understanding of the Council’s approach. For completeness all of National Highway’s representations concerning the Regulation 19 Local Plan are included (other than those of support). [↑](#footnote-ref-26)