

Catherine Nutting
Clerk of Plaistow and Ifold Parish Council

19 January 2022

Via email: clerk@plaistowandifold.org.uk

Dear Ms Nutting

This letter is to advise parish councils of progress to date with the Local Plan Review. The Council is continuing to progress the plan with the need for the correct evidence. I hope the Local Plan Newsletters have kept you informed of progress and highlighted some key issues as we move forward.

In July 2021 Members considered a report *Local Plan and Strategic Infrastructure Update*¹ which outlined the current position, and agreed the Plan should focus on delivering as much development as possible based upon the capacity of the plan area to accommodate development within an affordable and deliverable package of transport mitigation taking into account all sources of available funding.

Informal discussions have been held with Members regarding progress and developing further the potential distribution of development, for testing through the evidence (including transport modelling and negotiations with the highway authorities, and engagement with Southern Water, the Environment Agency and Natural England). Those discussions have been informed by the advice given by the Planning Inspector following his advisory session in his note which forms an appendix to the *Local Plan and Strategic Infrastructure Update* report.

Following advice from the Planning Inspector it has proven necessary to look at the Local Plan in two distinctive areas – the part of the District South of the South Downs National Park, and the Northern Area outside of the South Downs National Park

The Southern Part of the District

Following the conclusions in the July 2021 report, and the finding that in the current circumstances the Stockbridge Link Road is undeliverable, the Council has continued negotiations with the highway authorities to progress the Plan. This has indicated that there may be a level of development which they will be willing to support, which is less than previously envisaged in the *Preferred Approach Plan*. Further technical work is required to test this proposition, and to enable the Council and other parties to come to a view as to whether this is appropriate.

¹ Available on the Council's website at

<https://chichester.moderngov.co.uk/ieListDocuments.aspx?CId=308&MId=1547>

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Therefore a proposed revised distribution of development in the southern part of the plan area has been developed for testing through further transport modelling, engagement with infrastructure providers, sustainability appraisal and other evidence. As previously described in my letter to all Parish Councils in December 2020, this has been informed by the work set out on the Council's Local Plan evidence webpage, and also the results of the previous consultations with infrastructure providers.

The full proposed revised distribution of development for the southern part of the plan area is set out in Table 1 which accompanies this letter. As before, it is possible that the outcomes of further testing, or other changes in circumstances, indicate a further change in approach is required. However, it is only through testing a revised distribution that important matters such as infrastructure requirements can be finalised. It should also be noted that the findings of that testing may necessitate a change to the level, distribution, or timing of development.

The Northern Part of the Plan Area

As outlined in the Planning Inspector's advice last summer, there is an expectation that the Council should "look again" at this area to consider to what extent any shortfall in housing delivery may be reduced by further development in this area. The Council will need to document the process it has followed in testing how much development could be satisfactorily delivered in the northern part of the plan area.

That area is currently affected by the issue of water neutrality², which is preventing further planning permissions for residential and other development proposals which lead to a net increase in water consumption. However, work is being undertaken by the affected local planning authorities, government organisations and the water company to overcome this issue. This work is ongoing but until the outcome is known it would not be prudent for the Council to assume that the issue will continue to prevent further development in the area over the whole of the emerging Plan period to 2039.

Therefore, to document and inform a final decision on the appropriate level of development to be allocated in the northern part of the plan area, a series of scenarios have been developed, for further discussion and testing with transport infrastructure providers, sustainability appraisal, and market deliverability. The scenarios are set out in Table 2 which accompanies this letter. I should stress that the final level distribution of development may not exactly match *any* of these scenarios – but it is only through testing appropriate scenarios that we can arrive at an informed position for the emerging Plan.

Therefore, for those areas, while the District Council's plan-making process is not complete, I am now writing to inform you of progress so that you may consider the implications for your community and parish.

The intention is for this work to be undertaken between now and Easter, and we intend to update you after that on progress made and conclusions reached. If the

² Available on the Council's website at <https://www.chichester.gov.uk/waterresources>

evidence indicates the impacts of development can be satisfactorily addressed, and the Council is satisfied the outcomes can form the basis of a sound plan, then the intention would be to proceed to a formal consultation on the proposed submission plan. This work will inevitably have an impact on many of you and on the work that parishes are undertaking in relation to new and revised neighbourhood plans.

I should confirm that the figures set out in Tables 1 and 2 are based on “new allocations”, which means that (in the case of development to be delivered via parish neighbourhood plans), it is envisaged they will be delivered on sites of five dwellings or more which did not have planning permission as at 1 April 2021.

Any sites or schemes which already have planning permission, or are allocated in the existing Local Plan or a “made” Neighbourhood Plan as at 1 April 2021 would not count towards this figure. Nor would development on sites of less than five dwellings, as they count towards the “windfall” figure for the Local Plan Review and so cannot be double counted.

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

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

As before, it is not the Council’s intention to undertake consultation on the current proposed revised distribution at this stage. The Proposed Submission Plan will of course be the subject of full public consultation in due course.

I hope this is helpful but please let me know if you have any queries. We will also aim to meet parishes where necessary so that further explanation can be provided.

Yours sincerely

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

Toby Ayling
Planning Policy Divisional Manager

Table 1 Proposed Revised Distribution of Housing Development for Testing in southern part of Chichester Plan area

Sites in proposed allocation for testing	No of dwellings
West of Chichester (AL1)	1,600
Land at Shopwyke (AL2)	585
Land east of Chichester (AL3)	600
Land at Westhampnett / NE Chichester	500
Southern Gateway	270
Highgrove Farm Bosham	250
Land west of Park Farm, Selsey	250
Land west of Tangmere (AL14)	1,300
Maudlin, Westhampnett	270
Parish allocations in proposed allocation for testing	
Birdham	50
Boxgrove	50
Chichester City	300
Chidham & Hambrook (AL10)	300
Fishbourne (AL9)	30
Hunston	150
North Mundham	50
Southbourne	1,250
Westbourne	30

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

Table 2 Growth scenarios to be tested for the northern part of Chichester Plan area

	Kirdford	Loxwood	Plaistow and Ifold	Wisborough Green	Total
No further permissions ³	56	95	8	26	185
Limited Growth ⁴	70	115	15	40	250
Significant Growth 1	70	200	100	40	410
Significant Growth 2	110	290	115	80	595
Full development	242	322	795	118	1,477

³ Typically the scenarios set out in this table are for new sites which do not have permission as at 1 April 2021. However, this scenario does include those permissions for completeness sake to demonstrate that there is expected to be a certain level of development *whatever* follows in the final Plan.

⁴ Typically the scenarios set out in this Table are for new sites which do not have permission as at 1 April 2021. However, this scenario was prepared in November 2020. It is included here (and in future work) for completeness sake.