

21 February 2018

Andrew Frost  
Head of Planning Services

*By email*

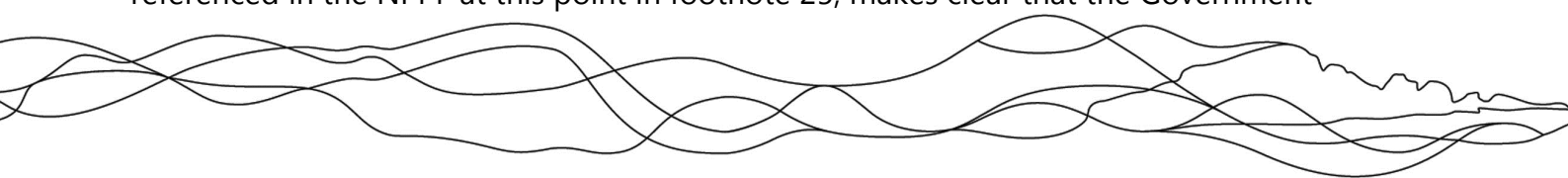
Dear Andrew

Subject: South Downs Local Plan - Duty to Cooperate

I write in relation to recent liaison between our two authorities regarding the South Downs Local Plan, the Chichester Local Plan Review 2034 and the Duty to Cooperate. Colleagues from our respective planning policy teams met on 24<sup>th</sup> October to discuss strategic cross-boundary planning issues, and have had subsequent discussions following on from this. I hope you can agree that these discussions have been very positive, in particular in helping both authorities understand better the position with regards unmet housing need in Chichester district (both within and outside the National Park) and how this relates to our respective Local Plan processes. I am grateful for CDC's positive comments and suggestions made in response to our consultation on the Pre-submission South Downs Local Plan.

Before going on to specific data which I understand colleagues have discussed, as a National Park Authority and Local Planning Authority, plan-making for the SDNPA is subject to the National Planning Policy Framework (NPPF). This outlines Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless specific policies in the NPPF indicate development should be restricted. An example of such restrictions given in footnote 9 on page 4 of NPPF are policies relating to the development of sites within a National Park.

Furthermore Paragraph 115 of the NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads. It should also be noted that the DEFRA UK Government Vision and Circular 2010 on English National Parks and the Broads, referenced in the NPPF at this point in footnote 25, makes clear that the Government



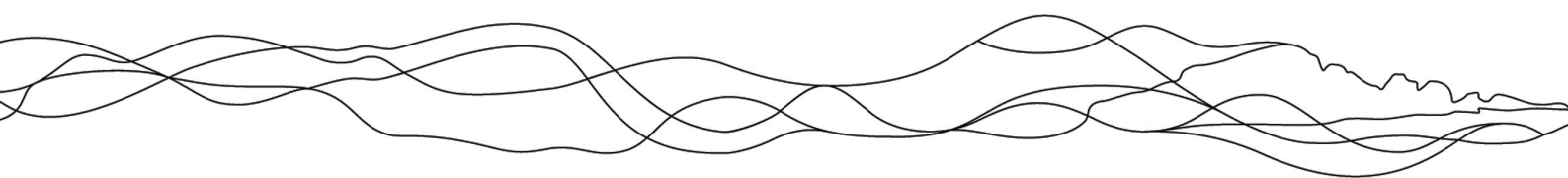
recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them.

It is against this background that an updated housing need and potential supply position in respect of the National Park is provided. This is based on our latest Authority Monitoring Report data on housing supply, related to the South Downs HEDNA which sets out objectively assessed housing needs in the National Park. Whilst there is no statutory need, given we are a single purpose Local Planning Authority planning for the National Park as a whole, we have in this instance broken this OAN and potential provision down by district. For Chichester district this is as follows:

<b>Proposed Housing Provision in South Downs Local Plan: Pre-submission</b>						<b>SDNP unmet need</b>	
<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>	<b>G</b>	<b>H</b>
<b>Provision made in the SDLP</b>	<b>Completions (2014/15 to 2016/17)</b>	<b>Planning Permissions</b>	<b>Windfall Allowance</b>	<b>Total Provision (A+B+C+D) (plan period 2014-2033)</b>	<b>Average Per Annum (E/19 years)</b>	<b>OAN in SDNP part of district (HEDNA)</b>	<b>Per annum difference (unmet need in SDNP) (F-G)</b>
677	290	404	163	<b>1,534</b>	<b>81</b>	<b>125</b>	<b>-44</b>

The Plan-led housing supply set out in the table above reflects that the South Downs Local Plan is a landscape-led plan, with ecosystem services at its heart, as your colleagues and Members are aware after the valuable training session we had recently. It also reflects Section 62 of the Environment Act 1995 which requires all relevant authorities to have regard to the purposes of national parks; the first of these is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. It also reflects our on-going discussions for over a year regarding the amount of potential housing delivery within the Chichester district part of the National Park, where we have consistently discussed a figure of around 70 dwellings per year being reasonable and I believe Members are aware of.

The figures indicate the SDNPA is not in a position to meet its full objectively assessed housing need, given the landscape protection accompanying National Park status. I understand you wish to place matters on a more formal footing for you and your Members now. Therefore in the spirit of paragraph 179 of the NPPF, whereby *joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the Framework*, and in light of your request, the SDNPA is formally requesting that Chichester District Council considers how it is able to accommodate some or all of the unmet housing need arising within the South Downs



National Park. It is suggested that this should be as part of the Chichester Local Plan Review 2034.

Colleagues working on our respective Local Plans will continue to liaise closely to address this matter, including exploring the finalisation of a Statement of Common Ground which has already been circulated in draft form. I hope you are able to share my confidence that a final version of this can be agreed in a timely manner, to allow us to move forward positively.

In that respect it would be useful if you could provide a timeframe for any engagement with your Councilors and any Committees you may need to report to. As I know you are aware ensuring we understand each other's key dates and keeping lines of communication open and clear is paramount in our conversation on this and other matters.

Yours sincerely

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