

# Public Document Pack

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A meeting of the **Cabinet** will be held in The Assembly Room - The Council House (Chichester City Council), North Street, Chichester on **Tuesday 3 December 2019** at **9.30 am**

MEMBERS: Mrs E Lintill (Chairman), Mrs S Taylor (Vice-Chairman), Mr M Bell, Mr R Briscoe, Mrs N Graves, Mrs P Plant and Mr P Wilding

## SUPPLEMENT TO AGENDA

### 6 **Local Plan Review - Responses to Preferred Approach Consultation and Way Forward** (Pages 1 - 318)

Appendices 1-4 included.

Please note that appendix 4 is electronic only.

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## Appendix 1

### Chichester District Local Plan Preferred Approach

November 2019

### Summary of responses - Part One

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#### Introduction

The Local Plan Review Preferred Approach was the subject of public consultation between 13 December 2018 and 7 February 2019.

Part One of the Preferred Approach Plan contained 32 Strategic Policies and 15 Strategic Allocations. Part Two set out 35 detailed Development Management Policies. In addition, a document set out proposed changes to the policies map and a Sustainability Appraisal and Habitats Regulations Assessment were also published.

Just over 3,200 representations were made by 729 respondents. These can be broken down as follows –

	Representations	Support	Object	Comment
Part 1	2742	389	1444	909
Part 2	401	92	136	173
Appendices to document	25	1	12	12
Sustainability Appraisal	17	0	2	15
Policies Map	20	4	6	10
Habitats Regulations Assessment	3	0	0	3

All the consultation responses are available in full via the consultation portal which can be accessed via the council's website at <https://www.chichester.gov.uk/article/30923/Preferred-approach---consultation-December-2018> . In addition, summary reports of the representations have been prepared and are also available on the same web page.

This report sets out a further summary of the responses received to Part One of the Plan. It focuses on the issues raised, and for that reason individual respondents are not named. However, where organisations have submitted responses, to help legibility, the organisation is stated in **bold**. All respondents have been advised of their respondent and representation numbers but if further guidance is sought please contact the Planning Policy team at [planningpolicy@chichester.gov.uk](mailto:planningpolicy@chichester.gov.uk)

It has not been possible to provide a unique reply to each representation received during the consultation. However, the document does set out an initial response to the issues raised based on all representations received. Whilst this does not represent the Council's final view, it indicates how further work to be undertaken for the new Local Plan is intended to proceed at this time, and how consultation comments influence the development of the Plan.

A second supplementary document will set out the consultation responses to Part 2 (Development Management Policies) and accompanying documents.

We would like to thank everyone who took the time to respond to this consultation.

<b>Introduction</b>				
Respondents	Representations	Support	Object	Comment
7	13	1	4	8
Representation numbers				
1295, 2289 (Historic England), 2395 (South Downs National Park Authority), 2585, 2616, 2620, 2621, 2797, 2800, 2803, 3057, 3058, 3059.				
Summary of issues and key comments raised by residents and other respondents				
South Downs National Park				
<ul style="list-style-type: none"> <li>• Unclear why National Park is given high level of prominence in the Local Plan Review, when unlike the AONB, it is not part of the Plan area.</li> <li>• Why is CDC not integrating planning process with area of SDNP within CDC area?</li> <li>• CDC need to understand where unmet need from SDNP is generated from.</li> </ul>				
Evidence Base				
<ul style="list-style-type: none"> <li>• Not known if effectiveness of current Local Plan has been evaluated, with findings used to inform Preferred Approach.</li> <li>• Evidence seen under FOI does not show appropriate and effective cooperation has occurred, particularly with Highways England for development of transport infrastructure.</li> <li>• Statements of Common Ground not available as part of consultation. These must be re-consulted on at the next stage.</li> <li>• Suggest amendments to specific wording - para 1.5 and 1.16. Historic Environment Strategy does not form adequate evidence base. Should consider if archaeological evidence and significance of city is understood and available. <b>(Historic England)</b></li> <li>• Commercial Development Plan absent as part of the consultation.</li> </ul>				
Amendments to wording				
<ul style="list-style-type: none"> <li>• Reference to Section 62 of the Environment Act 1995 should be added to paragraph 1.31. <b>(SDNPA)</b></li> </ul>				
Other				
<ul style="list-style-type: none"> <li>• Section 1.7 – Poor local community involvement under existing plan.</li> <li>• Section 1.10 - cannot be sustained. Developments under existing Plan have not respected character of Chichester.</li> <li>• Many errors, CDC accountable for supplying incorrect &amp; out of date information.</li> <li>• Section 1.26 - Support specific mention of need for cross-boundary cooperation over dark skies policy.</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
<p>Overall, it is considered the South Downs National Park is a critical part of the context for this Local Plan and the review document does not give it undue prominence. The National Park Authority works closely with the District Council and arrangements are in place for the District Council to deliver planning services on applications within the national park area. With regards to housing need, further detail is set out in the Housing Background Paper which will need to be updated.</p> <p>The effectiveness of the current Local Plan has been assessed in Authority Monitoring Reports published each year. Work is ongoing with Highways England and others on the necessary transport evidence to support the Local Plan, and progress on this and other matters will be documented in Statements of Common Ground which will inform the next stage of the Plan and be placed on the Council's website. Finally, work is underway to consider the detailed submission by Historic England and any necessary further work will be</p>				

reflected in the Plan as it develops. Ultimately, the final draft version of the Plan will be supported by all necessary evidence.

Reference to Section 62 of the Environment Act 1995 is not considered necessary – other legal requirements (for instance, relevant legislation for minerals and waste planning) are not detailed in this section.

Other comments are noted. The Plan will be subject to significant updating prior to the next public consultation.

Characteristics of Plan Area				
Respondents	Representations	Support	Object	Comment
11	21	1	5	15
Representation numbers				
2290 (Historic England), 2291 (Historic England), 2420 (South Downs National Park Authority), 2444 (South Downs National Park Authority), 2489 (Chidham & Hambrook Parish Council), 2586, 2622, 2804, 2806, 2809, 2813, 2838, 2887, 2974, 3060, 3061, 3062, 3063, 3064, 3108, 3146.				
Summary of issues and key comments raised by residents and other respondents				
Amendments to wording				
<ul style="list-style-type: none"> <li>• Para 2.13 - Insert Tourism as a significant employer.</li> <li>• Para 2.29 should reflect para 7.100 (balance of development needs within environmental and landscape limitations) as a key challenge.</li> <li>• Para 2.27 - reference to 61 in National Park is irrelevant and should be deleted.</li> <li>• Para 2.23 - Chichester Harbour is important for its landscape value, as well as biodiversity, land and water-based recreation, and tourism. Chichester Harbour AONB should get its own reference under Environment Characteristics.</li> <li>• Para 2.29 - List in order of importance. Start by protecting environmental and historic assets, then support economic and social development, then provision for new housing and business sites.</li> <li>• Para 2.29 - Suggest 7th bullet point is 'Protect and enhance the character of the area including the Chichester Harbour AONB and the setting of the SDNP'. <b>(SDNPA)</b></li> <li>• Para 2.29 - Climate change missing from list.</li> <li>• No recognition of requirements of established businesses for expansion and to build in resilience. No discussion of automotive sector/advanced manufacturing.</li> <li>• Final bullet 2.4 not consistent with para 6.91.</li> <li>• Para 2.28 – Object to "whilst recognising the need to accommodate new development" - used by developers to shoe-horn in inappropriate developments.</li> <li>• Para 2.18 - Phrase "offers the best potential for attracting inward investment" not substantiated. New jobs could drive out some existing businesses.</li> <li>• Para 2.18 – Object to "However, there is also a need to support and diversify economic activity in the rural parts of the plan area" original wording too unfocussed allowing any form of diversification. Only diversification that complements the area should be contemplated.</li> </ul>				
Changes to Maps				
<ul style="list-style-type: none"> <li>• Local Plan Map does not show Chichester Harbour AONB. Would help CDC demonstrate protected landscape constraints when identifying land for development.</li> <li>• Map page 16 - request clarification whether LP area includes Stedlands Farm and the Stable/Little Stedlands, Haslemere. <b>(SDNPA)</b></li> </ul>				
Transport				
<ul style="list-style-type: none"> <li>• Para 2.2, 2nd bullet: accessibility from Manhood peninsula worse than recorded.</li> <li>• Para 2.5: A27 operating at more than double original capacity. Improvements have not satisfactorily kept up with traffic increases.</li> </ul>				
East-West Corridor				
<ul style="list-style-type: none"> <li>• Term East-West Corridor is ill defined and use of this term implies the focus of policy is on transport and through movement, to detriment of a more balanced focus on</li> </ul>				

<p>local settlement, existing residential, local countryside and amenity issues. <b>(Chidham &amp; Hambrook Parish Council)</b></p> <ul style="list-style-type: none"> <li>• Lack of vision, clarity and coherence of policy to Bourne Villages, character and surrounding countryside between the South Downs and Chichester Harbour AONB.</li> </ul>
<p>Wildlife/Conservation</p> <ul style="list-style-type: none"> <li>• Para 2.24 - references to SNCIs; update to reflect sites now Local Wildlife Sites.</li> <li>• Para 2.29 - recommend penultimate bullet point is revised to include geodiversity and locally designated sites. Paras 171 and 174 of NPPF are clear locally designated sites must be safeguarded in plans in order to protect and enhance biodiversity.</li> <li>• Rural setting and green access need better acknowledgement and protection. Accesses are fragile, easily disrupted or downgraded by new developments.</li> </ul>
<p>Historic Environment</p> <ul style="list-style-type: none"> <li>• Support reference to historic environment of Chichester district, and heritage assets, in paras 2.27 and 2.28 as part of positive strategy for the conservation and enjoyment of historic environment (para 185 of NPPF). <b>(Historic England)</b></li> <li>• Support, in principle, identification of "Protect the area's valuable heritage and historic assets"" as one of the challenges faced. NPPF requires local plans to do more than just conserve historic environment i.e. to enhance it as well. Should be identified as a challenge. <b>(Historic England)</b></li> </ul>
<p>Other</p> <ul style="list-style-type: none"> <li>• Data should reflect local plan area only not the district, in particular social and economic characteristics.</li> </ul>
<p><b>Initial Council response to issues raised and way forward for the Local Plan Review</b></p> <p>The various suggested amendments to the description of the characteristics of the area will be considered for inclusion in the next iteration of the Plan, particularly with reference to consistency across the Plan document and ensuring the characteristics are accurately described.</p> <p>With regards to the map in this section, the purpose is simply to clearly identify the Plan area, not environmental constraints.</p> <p>Comments on transport are noted but the existing characteristics are considered adequately described elsewhere in the Plan and the evidence base.</p> <p>The comments regarding East West corridor are noted. The description will be reviewed but is broadly considered a reasonable short summary of the characteristics of the area.</p> <p>The description and issues regarding wildlife and conservation are noted and any appropriate updating and amendments to the challenges will be reflected in the next iteration of the Plan.</p> <p>Comments regarding the historic environment are noted and requirement to enhance the historic environment will be reflected in next version of the Plan.</p> <p>The Plan does not cover the whole district. Data used in the Plan and supporting evidence is sourced at the most appropriate scale considering the availability and suitability of data.</p>

<b>Spatial Vision and Objectives; Local Plan Strategic Objectives; Spatial Strategy</b>				
Respondents	Representations	Support	Object	Comment
57	83	12	27	44
Representation numbers				
113, 155 (West Wittering PC), 156 (West Wittering PC), 157 (West Wittering PC), 227, (Sustrans), 235 (Sustrans), 260, 339, 378, 421, 422, 481, 488, 489, 490, 491, 492, 494, 496, 497, 509, 525,552, 577, 972, 1003, 1035, 1123, 1272 (Goodwood Estates), 1390, 1396, 1442 (Natural England), 1444 (Natural England), 1475 (Theatres Trust), 1477 (Theatres Trust), 1581, 1595 (Harbour Villages Lib Dem Campaign), 1614, 1652, 1657, 1885, 1973, 1977, 1979, 2007, 2094 (WSCC), 2100 (WSCC), 2235, 2242 (Historic England) , 2243 (Historic England), 2347, 2540 (Chichester Harbour Trust),2458 (Southbourne PC), 2627, 2702, 2741, 2794, 2795, 2815, 2817, 2821, 2823, 2825, 2827, 2831, 2832, 2842 (Sussex Wildlife Trust), 2843, 2853 (Sussex Wildlife Trust) , 2855 (Sussex Wildlife Trust), 2860 (Sussex Wildlife Trust), 2888, 2894 (Sussex Wildlife Trust), 2965, 2976, 2978, 2977, 2984, 3065 (Chichester Harbour Conservancy) 3066 (Chichester Harbour Conservancy), 3151 (Rolls Royce), 3476, 3478, 3517 (Goodwood Estates)				
Summary of issues and key comments raised by residents and other respondents				
Support: <ul style="list-style-type: none"> <li>• Vision supports culture and arts (<b>Theatres Trust</b>)</li> <li>• Recognition of the importance of biodiversity and unspoilt landscapes (<b>Natural England</b>)</li> <li>• Paras 3.4 and 3.14, objective relating to conserving and enhancing landscape and heritage (<b>Historic England</b>)</li> <li>• Inclusion of a group of environmental objectives (<b>Sussex Wildlife Trust</b>)</li> <li>• Health and wellbeing references</li> <li>• Integrated transport objective and strategic transport objectives.</li> <li>• General support</li> </ul>				
Additional objectives / elements of vision suggested: <ul style="list-style-type: none"> <li>• Mitigating and Adapting to Climate Change - including renewable energy. Natural England suggest objective should be more ambitious – to reduce greenhouse emissions rather than minimise increase – noting the district is at particular risk from climate change.</li> <li>• Vision should specify that more homes will be delivered in the places people want to live.</li> <li>• Objective relating to improving cycling and public transport should also refer to walking (<b>WSCC</b>)</li> <li>• Health and Wellbeing should refer to walking/cycling.</li> <li>• Recognise role of Rolls Royce and potential expansion needs (<b>Rolls Royce</b>)</li> <li>• Need greater recognition of infrastructure requirements.</li> <li>• Would like to see stronger commitment to net biodiversity gains and natural capital, ecosystem services and climate resilience (<b>Sussex Wildlife Trust</b>).</li> <li>• Need a long term solution to A27.</li> <li>• Build reservoirs in the downs to catch rain and reduce coastal groundwater.</li> </ul>				
Object to taking 41 homes from SDNP <ul style="list-style-type: none"> <li>• Need affordable homes in SDNP for local people.</li> </ul>				
Comments relating to plan/strategy overall: <ul style="list-style-type: none"> <li>• Plan does not reflect the aspiration set out in 3.7 to carefully manage relationship of SDNP and AONB by maintaining and enhancing countryside between settlements (<b>Chichester Harbour Conservancy</b>)</li> <li>• Object to 3.5 suggestion that new development will be well located – Tangmere has</li> </ul>				

<ul style="list-style-type: none"> <li>no rail station.</li> <li>• Need to consider development opportunities to North of city.</li> <li>• East West Corridor doesn't have good cycle links – improvements to NCN2 and feeder routes are needed (<b>Sustrans</b>)</li> <li>• Dispute that new homes will make East Wittering more self contained or provide jobs (West Wittering PC)</li> <li>• Objections to term East-West corridor – seen as pejorative as settlements are distinct.</li> <li>• Objections to AL6</li> </ul>
<p>Support but sceptical about the implementation and delivery of the vision / whether the rest of the plan is consistent with them.</p> <ul style="list-style-type: none"> <li>• Conflict between different parts of plan.</li> </ul>
<p>Various comments on specific paragraphs and other wording suggestions:</p> <ul style="list-style-type: none"> <li>• 3.1 <b>Historic England</b> suggest changes</li> <li>• 3.2 needs to go further re climate change</li> <li>• 3.4. too economic focussed.</li> <li>• 3.19 road building is not the solution – walking, cycling, public transport.</li> <li>• 3.19 should include mitigated northern route</li> <li>• Add ref to Waste Local Plan policy (<b>WSCC</b>)</li> <li>• Section on Manhood should refer to the Chichester Harbour AONB</li> <li>• 4.3 refer to natural environment</li> <li>• 4.4 ecological networks and green infrastructure</li> <li>• 4.84 need to spend on local roads A286</li> <li>• Expand references to health and wellbeing for older people to include children and people with disabilities.</li> </ul>
<p>Other general comments:</p> <ul style="list-style-type: none"> <li>• Loss of buses in Southbourne (<b>Southbourne PC</b>)</li> <li>• Comments on individual developments, kind of shops wanted, jobs lost, shops and facilities closed etc</li> <li>• Requests to attend examination</li> <li>• Concerns about publicity</li> <li>• Housing should be affordable and for local people, limit 2<sup>nd</sup> homes</li> <li>• Comments relating to SUDs, grey water systems, ponds, cycle links, bus provision</li> </ul>
<p><b>Initial Council response to issues raised and way forward for the Local Plan Review</b></p>
<p>The additional elements proposed to be added to the vision are noted. Further aims, and in particular capturing an appropriate articulation of the climate emergency declared by the Council, will be proposed in the next iteration of the plan. This includes detailed suggestions submitted by a number of parties.</p> <p>Concerns over the distribution of development are acknowledged. The ongoing Sustainability Appraisal and other evidence will continue to test and refine the distribution with regards to environmental impacts and other considerations.</p>

<b>Policy S1 Presumption in Favour of Sustainable Development</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 7	7	0	4	3
Policy: 10	11	2	7	2
Representation numbers				
106, 231 (Sustrans), 304, 343, 553, 643, 860, 1210, 1601, 2244 (Historic England), 2459 (Southbourne Parish Council), 2703, 2757 (Home Builders Federation), 2981, 3003, 3010, 3014, 3293				
Summary of issues and key comments raised by residents and other respondents				
Support				
<ul style="list-style-type: none"> <li>Support positive approach to planning; presumption in favour of sustainable development.</li> </ul>				
Policy Wording				
<ul style="list-style-type: none"> <li>Repeats NPPF, is it necessary. <b>(Home Builders Federation)</b></li> <li>Include Strategic Objective 10 of Chichester Vision 'to move around safely and conveniently with opportunities to choose alternatives to car travel.' <b>(Sustrans)</b></li> <li>Reliance on national principles insufficient; should aim higher. Reference principles in Wildlife Trust's 'Homes for People and Wildlife' policy guidance and WHO's 'Urban Green Spaces - A Brief For Action.' <b>(Southbourne Parish Council)</b></li> <li>Not enough detail. Need small scale developments which can be absorbed and not overwhelm infrastructure. Infrastructure to be delivered before large developments.</li> </ul>				
Amendments to text wording				
<ul style="list-style-type: none"> <li>Reword to reflect paragraph 11 of NPPF. <b>(Historic England)</b></li> <li>Section 4.2 Insert "and natural" in last sentence "...of the built <u>and natural</u> environment"</li> <li>Where Neighbourhood Plan in place, state policies it contains are of prime importance.</li> </ul>				
Environment				
<ul style="list-style-type: none"> <li>Not sufficiently supportive of environment.</li> <li>Consider it essential all new developments should be truly sustainable ie use renewable energy rather than fossil fuels; be fully insulated.</li> <li>Does not take account of environmental damage some strategic areas will suffer.</li> <li>Principle of NPPF for healthy and just society. Focussing more traffic on A27 corridor not healthy. Stockbridge already exceeds the recommended air quality levels.</li> <li>In ecology terms no new housing development on greenfield or agricultural land is sustainable.</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
<p>The inclusion of this policy has been questioned, but on balance it is considered a useful addition to the Plan to have a confirmation of the presumption in favour of sustainable development.</p> <p>Detailed comments regarding the policy wording will be considered further, with the intention of reflecting the intentions of the NPPF in the Chichester context.</p> <p>Comments on the environment will be considered further and reflected in an expanded section which contains a little more detail and clarity on sustainable development principles, taking into account best practice.</p>				

<b>Policy S2 Settlement Hierarchy</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 4	4	0	2	2
Policy: 51	63	29	17	17
Representation numbers				
<p>3270 (Loxwood PC), 3312 (Genesis Town Planning obo Landlink Estates Ltd), 3415 (Genesis Town Planning obo Meadows Partnership), 3268 (Genesis Town Planning obo Landacre Developments Ltd), 3331(Genesis Town Planning obo Mr Landgmead), 3337 (Genesis Town Planning obo Mr and Mrs Ellis), 3364 (Genesis Town Planning obo Mr Ferguson), 3380 (Genesis Town Planning obo Mr and Mrs Tearall), 3384 (Genesis Town Planning obo Ms Newman), 1312 (Seaward Properties), 1273 (HMPC Ltd), 2704 (Gladman), 2742 (Gleeson Strategic Land), 2623 (Barton Wilmore obo Martin Grant Homes), 1186 (Nova Planning), 2796 (LRM Planning Ltd obo Hallam Land Management), 2771 (ICENI Projects obo Fishbourne Developments Ltd), 3015 (Neame Sutton Ltd obo Sunley Estates Ltd), 3298 (Lucken Beck MDP Ltd obo Barratt Homes), 3309 (Genesis Town Planning obo Domusea), 2885 (Savills UK obo Bloor Homes Southern), 3241 (WSCC), 3324 (Luken Beck MDP Ltd obo Seaward Properties), 3423 (Genesis Town Planning obo Seaward Properties), 3407 (Genesis Town Planning obo Seaward Properties), 3420 (Genesis Town Planning obo Seaward Properties), 3401(Luken Beck MDP Ltd obo Seaward Properties), 3394 (Luken Beck MDP Ltd obo Seaward Properties), 3389 (Luken Beck MDP Ltd obo Seaward Properties), 3398 (Luken Beck MDP Ltd obo Seaward Properties), 2628 (Barton Willmore), 2691 (DMH Stallard obo Welbeck Strategic Land (IV) LLP) , 2786 (ICENI Projects obo Antler Homes Ltd), 3004 (Neame Sutton Ltd obo Danescroft Land Ltd), 3221 (Genesis Town Planning obo Elberry Properties), 3288 (Genesis Town Planning obo Chichester Grain Ltd), 3352 (Nexus Planning Ltd obo CEG), 3360 (Genesis Town Planning obo Junnell Homes Ltd), 3370 (Luken Beck MDP Ltd obo Landlink Estates Ltd), 3235 (Henry Adams LLP obo Taylor Wimpey Strategic Land ), 2608 (CBRE obo Premier Marinas), 2148, 2975 (Plaistow &amp; Ifold PC), 2490 (Chidham &amp; Hambrook PC), 1990, 3408 (Genesis Town Planning obo Greenwood Group Ltd), 734, 3290 (Lucken Beck MDP Ltd obo Barratt Homes, 2182, 1583, 238 (Sustrans), 648, 2917 (Genesis Town Planning obo Mr Phillips), 704, 1098, 1273 (HMPC Ltd), 2245 (Historic England), 3380, 3420 (Genesis Town Planning obo Seaward Properties Ltd), 793, 3115 (Chichester Harbour Conservancy), 297, 299, 2742 (Gleeson Strategic Land), 2490 (Plaistow &amp; Ifold PC), 1661, 2704 (Gladman), 297, 648, 1661, 1990, 787, 788, 1312 (Seaward Properties)</p>				
Summary of issues and key comments raised by residents and other respondents				
Request for settlement boundary				
<ul style="list-style-type: none"> <li>• Plaistow should have a settlement boundary 3270 (<b>Loxwood PC</b>)</li> </ul>				
Support for hierarchy classification for following locations:				
<ul style="list-style-type: none"> <li>• Loxwood (<b>Landlink Estates Ltd and Antler Homes</b>), West Wittering (<b>Meadows Partnership</b>), Fishbourne (<b>Landacre Developments, Fishbourne Developments, Seaward Properties</b>), Birdham (<b>Martin Grant Homes</b>), North Mundham/Runcton (<b>Domusea and Junnell Homes Ltd</b>), Chidham and Hambrook (<b>Sunley Estates Ltd, Seaward Properties Ltd</b>), Hunston, Earnley (<b>Seaward Properties</b>), Southbourne (<b>Nova Planning, Hallam Land Management, Domusea, Seaward Properties, Barton Wilmore, Chichester Grain Ltd</b>), East Wittering/Bracklesham (<b>Barratt Homes, Welbeck Strategic Land</b>), Tangmere (<b>Bloor Homes Southern, Seaward Properties Ltd</b>), Chichester as sub-regional centre (<b>WSCC, Elberry Properties</b>), Bosham (<b>Seaward Properties Ltd</b>)</li> <li>• Hermitage should be service village (<b>Seaward Properties</b>)</li> </ul>				
Suggested service villages:				

<ul style="list-style-type: none"> <li>• Marina as part of Birdham service village (<b>Premier Marinas</b>)</li> <li>• Sidlesham (Greenwood Group)</li> </ul>
<p>Object to designation of service village:</p> <ul style="list-style-type: none"> <li>• Plaistow and Ifold – no settlement boundary (<b>Plaistow and Ifold PC</b>)</li> </ul>
<p>Definition of settlement hub:</p> <ul style="list-style-type: none"> <li>• Should include good access to main road network, the rail network, employment and secondary and higher education facilities (<b>Barratt Homes</b>)</li> <li>• Should have access by sustainable means of transport</li> </ul>
<p>Further reviews required:</p> <ul style="list-style-type: none"> <li>• All sustainable villages to provide more scope for windfall sites</li> </ul>
<p>Methodology/calculation of OAN/housing numbers:</p> <ul style="list-style-type: none"> <li>• No correlation between ONS population data and OAN</li> <li>• No account taken of what can practically be achieved.</li> </ul>
<p>Policy wording:</p> <ul style="list-style-type: none"> <li>• Include reference to potential effects on Historic Environment in assessing whether settlement suitable location for additional housing growth (<b>Historic England</b>)</li> <li>• Ensure services provided before development, strengthen plan wording to achieve this.</li> <li>• Chidham and Hambrook should be referred to throughout plan, not Hambrook/Nutbourne</li> <li>• Make reference to employment in sustainability criteria.</li> </ul>
<p><b>Initial Council response to issues raised and way forward for the Local Plan Review</b></p>
<p>For the purposes of the settlement hierarchy Plaistow &amp; Ifold are considered to function together as a single settlement. In this case, the characteristics of Plaistow means a legible, coherent settlement boundary is difficult to establish. Nonetheless the range of services and level of population set out in the settlement hierarchy background paper mean that together they warrant identification as a Service Village.</p> <p>The support for the identification of the hierarchy classification is noted. Suggestions for additional service villages, and objections to Plaistow and Ifold are noted but there does not seem sufficient justification for changing the hierarchy.</p> <p>The suggested amendments to the definition of a service hub are noted. The availability of public transport and a range of facilities is already included in the methodology for identifying the hierarchy. No compelling evidence has been received to indicate changes are necessary.</p> <p>The expectation is that sustainable villages may well provide windfall development, either through infill or windfall sites.</p> <p>The assessment of housing need is set out elsewhere in the Plan.</p> <p>Regarding policy wording, it is considered other policies in the Plan protect the historic environment and deal with the provision of services; Hambrook/Nutbourne are the two settlements identified for the purposes of this policy; although employment sites are not explicitly outlined in the criteria, the location of sites in the methodology means that its inclusion would not lead to a significantly different outcome.</p>

<b>Policy S3 Development Strategy</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 21	24	2	6	16
Policy: 95	117	14	49	54
Representation numbers				
79, 207, 232, 295, 361, 423, 425, 498, 557, 569, 583, 616, 653, 658, 702 (Paul Newman Property Consultants), 716, 1062, 1110 (Batcheller Monkhouse), 1167, 1174, 1175, 1244 (North Mundham PC), 1314 (Seaward Properties Ltd), 1327, 1350, 1377, 1502, 1505 (Wisborough Green PC), 1519 (Lewis & Co Planning), 1540, 1554, 1604 (Harbour Villages Lib Dem Campaign Team), 1633, 1662, 1797 (Heaver Homes Ltd), 1798, 1846, 1886, 1888, 1894, 1972, 1993, 3353 (CEG), 2009, 2035, 2042, 2221, 2296 (Portsmouth Water), 2402 (SDNPA), 2473, 2492, 2529, 2541 (Chichester Harbour Trust), 2629 (Barton Willmore), 2744 (Gleeson Strategic Land), 3005 (Danescroft Land Ltd), 2651, 2652 (Church Commissioners), 2692 (Wellbeck Strategic Land LLP), 2705 (Gladman), 2735 (Sussex Wildlife Trust), 2783 (Fishbourne Developments Ltd), 2788 (Antler Homes Ltd), 2798 (Hallam Land Management Ltd), 2845, 2846, 2847, 2865 (Persimmon Homes), 2890, 2936 (CPRE Sussex), 2987, 3056 (Chichester Harbour Conservancy), 3124, 3148 (Rolls Royce Motor Cars Ltd), 3236 (Taylor Wimpey Strategic Land), 2883 (Casa Coevo), 3242 (WSCC Estates), 3271 (Loxwood PC), 3294 (Church Commissioners), 3391, 3395, 3399 (Seaward Properties), 3402 (Seaward Properties), 3325 (Seaward Properties), 3355 (Landlink Estates Ltd), 3494, 3503, 3511, 3514 (HMPC Ltd), 3549				
Omission site representations:				
3432 (Domusea), 3427 (Seaward Properties), 3428 (Seaward Properties), 3429 (Seaward Properties), 3434 (Landacre Development Ltd), 3433 (Chichester Grain Ltd), 3431 (Junnell Homes Ltd), 3377 (Jeff Ferguson), 3382 (Mr and Mrs Tearall), 3388 (Rebecca Newman), 3413 (Greenwood Group Ltd), 3121 (Brookhouse Group), 2624 (Martin Grant Homes), 3320 (Landlink Estates), 3025 (William Lacey Group), 2836 (Casa Coevo), 3144 (Rolls Royce Motor Cars Ltd), 3017 (Sunley Estates Ltd), 3234 (Taylor Wimpey Strategic Land), 1644 (Thomas Procter), 3228 (J Pitts), 2674 (Devonshire Developments Ltd), 2811 (Pam Clingan), 2603 (Welbecj Strategic Land IV LLP), 2697 (Artemis Land and Agriculture Ltd), 2785 (Antler Homes Ltd), 2820 (Asprey Homes Southern), 2919 (D G Philips), 3008 (Danescroft Ltd), 3012 (Castle Properties), 3019 (Charities Property Fund), 3020 (Thakeham Homes), 3038 (G Rudsedski), 3040 (Mr and Mrs Bell), 3042 (Mr and Mrs Seymour), 3043 (Mr and Mrs Sadler), 3044 (Mr and Mrs Pick), 3045 (Mr and Mrs Green), 3048 (Mr and Mrs Chitty), 3122 (D R Pick Grandchildren's Settlement), 3142 (Obsidian Strategic SB Ltd), 3220 (Elberry Properties Ltd), 3231 (Trustees of C L Meigher Lovett Will Trust), 3540 (CEG), 3334 (Samuel Langmead), 3544 (Berkeley Strategic Land Ltd), 1506 (Berkeley Strategic Land Ltd), 1643 (Thomas Procter)				
Summary of issues and key comments raised by residents and other respondents				
Support policy: <b>(Barton Willmore, Gleeson Strategic Land, CEG, Danescroft Land Ltd, Antler Homes Ltd, Hallam Land Management Ltd, Church Commissioners, Fishbourne Developments Ltd, Wellbeck Strategic Land LLP, Seaward Properties)</b>				
Support local community facilities (as set out in 2b of policy) in smaller settlements to improve self-sufficiency				
Housing numbers should be increased: <ul style="list-style-type: none"> <li>To raise allocation numbers and meet wider unmet need <b>(Fishbourne Developments Ltd, Persimmon Homes)</b></li> <li>Need greater flexibility in plan <b>(Church Commissioners)</b></li> </ul>				

<ul style="list-style-type: none"> <li>• Sites in Chichester could have higher numbers (<b>WSCC Estates</b>)</li> </ul>
<p>Housing numbers:</p> <ul style="list-style-type: none"> <li>• Ensure plan meets OAN, employment needs and protects essential open spaces around the city with long term designation (<b>HMPC Ltd</b>)</li> <li>• Be clear what quantum of development is allocated at each tier (<b>Gladman</b>)</li> <li>• Unclear how proportions of dwelling numbers were arrived at; suggest minimum of 1,400 new homes on Manhood rather than 750 (<b>Landlink Estates Ltd</b>)</li> <li>• No vision for housing and employment land</li> <li>• Aggressive plan being introduced when old plan not expired. Strong opposition to large scale developments.</li> <li>• Housing levels should be as in adopted Local Plan ; reinforce Manhood Peninsula existing communities, tourism, agricultural enterprises</li> </ul>
<p>Settlement hierarchy:</p> <ul style="list-style-type: none"> <li>• Long term growth requirements may lead to reconsideration of hierarchy (Heaver Homes Ltd)</li> <li>• Consideration to be given to Lavant for development</li> <li>• Selsey is not a hub</li> <li>• Fishbourne is not service village</li> <li>• Westbourne could deliver housing (<b>Paul Newman Property Consultants</b>)</li> <li>• Camelsdale, Birdham and Hermitage should be service villages (<b>Casa Coevo, Lewis &amp; Co Planning, Seaward Properties</b>)</li> </ul>
<p>Service villages:</p> <ul style="list-style-type: none"> <li>• Development here driven by opportunities (<b>Wisborough Green PC</b>)</li> <li>• Service villages not sufficiently defined (<b>Harbour Villages Lib Dem Campaign Team</b>)</li> <li>• Insufficient evidence for selection of allocations in service villages (<b>Taylor Wimpey Strategic Land</b>)</li> <li>• No recognition of special characteristics of each</li> <li>• North Mundham/Runcton suitable for strategic development (<b>Batcheller Monkhouse</b>)</li> </ul>
<p>Infrastructure:</p> <ul style="list-style-type: none"> <li>• Are locations on the Manhood peninsula suitable</li> <li>• Lack of facilities and services needs to be addressed</li> <li>• Need safe transport infrastructure</li> <li>• Allocations west of Chichester need consideration of water supply (<b>Portsmouth Water</b>)</li> <li>• A27 upgrade is key</li> <li>• Need good walking and cycling infrastructure</li> <li>• Conflict of link road and flooding area</li> </ul>
<p>Distribution:</p> <ul style="list-style-type: none"> <li>• Lack of comprehensive guidance and evidence for east/west corridor</li> <li>• Develop in north away from coastal flooding areas</li> <li>• Sites in north outside Loxwood available to take development (<b>Loxwood PC</b>)</li> <li>• Manhood cannot sustain levels of proposed development</li> <li>• Need new settlement</li> <li>• Will result in conurbation from Southbourne to Bognor to Tangmere</li> <li>• Inadequate balance between east/west corridor and Boxgrove, Halnaker, Goodwood etc.</li> <li>• Inconsistent approach to Hunston</li> <li>• Better distribution across District (<b>Seaward Properties Ltd</b>)</li> <li>• Majority of development should be around Chichester</li> <li>• Housing and employment to be around Lavant to absorb housing from SDNPA</li> </ul>

- No evidence of need of 500 homes at Chidham and Hambrook
- Harm to environment if east/west corridor developed
- Need to be able to integrate development proportionate to settlement size
- SDNPA should take share of development
- Need to balance requirements of new housing and need to protect sensitive attractive areas (**North Mundham PC**).
- Need to address west of Chichester as a whole rather than individual settlements along a transport route. (**Southbourne PC**)

Environment:

- Concern CDC has not discharged landscape duties under Countryside and Rights of Way Act (2000). Development located directly outside AONB boundary. Insufficient evidence cumulative effects of development have been considered. (**Chichester Harbour Conservancy**)
- Concern re level of greenfield development and ability of natural capital to absorb level and location of development (**Sussex Wildlife Trust**)
- Setting of SDNPA and AONB (**SDNPA**)
- Air quality and traffic congestion issues at Stockbridge
- Damage to environment and landscape (**Chichester Harbour Trust**)
- No indication approach of brownfield sites first before greenfield has been used for strategy (**CPRE Sussex**)
- Building on floodplain up to Chichester Harbour boundary would be destructive, no justification

Economy:

- Government recognise High Streets not just retail; Selsey needs to increase footfall with other uses.
- Underplay Chichester's role as tourist destination
- No consideration of need for strategic employment site (**Rolls Royce Motor Cars Ltd**)
- Noise buffer at Goodwood should be developed as strategic employment site; include strategic housing south of Lavant and west of Chichester as exception site for meeting SDNPA unmet housing need.
- Chichester Marina reword reference to promotion of 'small scale' (**Premier Marinas**)

Promoted sites:

- Pigeon House Farm, North Mundham, Wayside, Main Road, Nutbourne, Inlands Road, Southbourne, Land south of Gordon Road, Southbourne (**Domusea**)
- 98 Fishbourne Road (**Seaward Properties Ltd**)
- Former Burnes Shipyard, Bosham (**Seaward Properties Ltd**)
- Cox's Barn Farm, Chidham and Hambrook (**Seaward Properties Ltd**)
- Land south of Clay Lane (**Landacre Developments Ltd**)
- Chichester Grain, Priors Leaze Road (**Chichester Grain Ltd**)
- Land east of The Spinney, Runcton (**Junnell Homes Ltd**)
- Bramber Nursery, West Wittering (**Jeff Ferguson**)
- South of Yeoman's Field for housing (**Mr and Mrs Tearall**)
- Site at Farmfield Hunston for housing (**Ms Rebecca Newman**)
- Greenwood Nursery Highleigh Road Sidlesham (**Greenwood Group Ltd**)
- Land at Barnfield Drive - continue to allocate through the LPR as part of the site does not yet have planning permission (**Brookhouse Group**)
- Land to the west of Bell Lane, Birdham (**Martin Grant Homes**)
- Site at Loxwood House Guildford Road (**Landlink Estates Ltd**)

- Land at Blackboy Lane and Clay Lane, Fishbourne (**William Lacey Group**)
- Land to the rear of Sturt Avenue, Lynchmere (**Casa Coevo**)
- Land east of Rolls Royce for RR expansion (**Rolls-Royce Motor Cars Limited**)
- Land east of Broad Road, Hambrook (**Sunley Estates Ltd**)
- Land at Chantry Hall Farm, Westbourne (**Taylor Wimpey Strategic Land**)
- Land at Bosham (**Mr Thomas Procter**)
- Land north of Maudlin Farm, Westhampnett (**J Pitts**)
- Land south of B2166, North Mundham (Lowlands) (**Devonshire Developments Limited**)
- Land south of Madgwick Lane, Westhampnett (**Pam Clingan**)
- Land south of Townfield, Kirdford for housing (**Welbeck Strategic Land IV LLP**)
- Site at Crouchlands Farm (**Artemis Land and Agriculture Ltd**)
- Black Hall, Loxwood, Land at Loxwood House, Loxwood (**Antler Homes Ltd**)
- Lansdowne Nursery and Sherwood Nursery, Oving (**Asprey Homes Southern**)
- Land north of Brandy Hole Lane and Land west of Plainwood Close (**Mr D G Phillips**)
- Site at Portfield Quarry (**Danescroft Land Ltd**)
- Loxwood Farm Place (**Castle Properties**)
- 12 - 18 West Street and 51-55 Tower Street (**Charities Property Fund**)
- Land West of Guildford Road, Loxwood (**Thakeham Homes**)
- Land at Herons Farm, Kirdford (**Mr G Rudsedski**)
- Land at Stoney Meadow Farm (**Mr & Mrs Bell**)
- Land at Orchard House, Loxwood (**Mr and Mrs Seymour**)
- Land south of Salthill Park (**Mr and Mrs Sadler**)
- Land to the west of Chaffinch, Burlow and Florence Close (**Mr & Mrs Pick**)
- Land west of Delling Lane, Bosham (**Mr and Mrs Green**)
- Land east of Hermitage Close (**Mr and Mrs Chitty**)
- Land at Whitestone Farm, Birdham (**D R Pick Grandchildren's Settlement**)
- Land south of Main Road, Hermitage (**Obsidian Strategic SB Limited**)
- Land at Sherwood Nursery Lansdowne Nursery (**Elberry Properties Ltd**)
- Land at Salthill Park, Chichester (**Trustees of CL Meighar Lovett Will Trust**)
- Land within the existing SDL boundary, to the east of the River Lavant (**CEG**)
- Church Road Birdham (**Mr Samuel Langmead**)
- Land at Raughmere Farm, Chichester (**Berkeley Strategic Land Ltd**)
- Land at Lawrence Farm (**Berkeley Strategic Land Ltd**)
- Land north of railways line at Highgrove Farm (**Mr Thomas Procter**)

Initial Council response to issues raised and way forward for the Local Plan Review

Comments in support are noted.

The comments regarding housing numbers are noted. The rationale for the overall amount of housing in the Preferred Approach is set out in the Housing Background Paper. The rationale for distribution is set out in the Plan, Sustainability Appraisal and supporting evidence.

Representations received on the settlement hierarchy, individual service villages and proposed new service villages are noted. Overall, it is considered the settlement hierarchy is

a reasonable basis for developing the Local Plan Review.

Where appropriate comments regarding infrastructure requirements will be addressed through an updated Infrastructure Delivery Plan and associated documents such as additional transport evidence.

Concerns over the distribution of development are acknowledged. The ongoing Sustainability Appraisal and other evidence will continue to test and refine the distribution with regards to environmental impacts and other considerations.

The environmental impacts have been considered through the evidence base prepared to date, including the Strategic Wildlife Corridors work, Strategic Flood Risk Assessment, Landscape Capacity Study and Gap Assessment, Habitats Regulations Assessment and Sustainability Appraisal. Further iterations of this work will consider further those impacts.

Specific comments regarding economic factors will be considered further as the Plan progresses.

Promoted sites will be considered where appropriate through a refresh of the Housing and Economic Land Availability Assessment, and if necessary through further Sustainability Appraisal work.

<b>Policy S4 Meeting Housing Need</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 24	27	1	20	6
Policy: 115	127	6	76	45
Representation numbers				
<p>2445 (Adur and Worthing DC), 3296 (Church Commissioners for England), 2449 (Horsham District Council), 2870 (Rodway Planning Consultancy Ltd obo Mr and Miss Butterfield and Waldron), 3139 (PRP Architects Ltd obo Obsidian Strategic SB Ltd), 2834 (Verve Planning obo Casa Coevo), 2801 (LRM Planning Ltd obo Hallam Land Management), 2625 (Barton Wilmore obo Martin Grant Homes), 2438 (SDNP), 2937 (CPRE Sussex), 3238 (Henry Adams LLP obo Taylor Wimpey Strategic Land), 3243 (Henry Adams LLP obo WSCC Estates), 2779 (ICENI projects obo Fishbourne Developments Ltd), 2789 (ICENI Projects obo Antler Homes), 3354 (Nexus Planning Ltd obo CEG), 3551(WYG obo Berkeley Strategic Land Ltd), 3326 (Luken Beck MDP Ltd obo Seaward Properties Ltd), 3396 (Luken Beck MDP Ltd obo Seaward Properties Ltd), 3392 (Luken Beck MDP Ltd obo Seaward Properties Ltd), 2631(Barton Wilmore), 3009 (Neame Sutton obo Castle Properties), 3002 (Neame Sutton Ltd obo Danescroft Land Ltd), 3013 (Neame Sutton Ltd obo Sunley Estates), 3036 (Sigma Planning Services obo Rydon Homes Ltd), 3317 (Genesis Town Planning obo Landlinx Estates), 3222 (Genesis Town Planning obo Elberry Properties Ltd) 3289 (Genesis Town Planning obo Chichester Grain Ltd), 3410 (Genesis Town Planning obo Greenwood Group Ltd), 3332 (Genesis Town Planning obo Mr Langmead), 3385 (Genesis Town Planning obo Miss Newman), 3301 (Luken Beck MDP Ltd obo Barratt Homes), 1542, 961(Birdham PC), 145, 1446, 1353, 2232, 530, 708, 1423, 426, 2109, 2755 (Home Builders Federation), 3021(Thakeham Homes), 2604 (Boyer Planning obo Welbeck Strategic Land IV LLP), 2707 (Gladman), 2745 (Gleeson Strategic Land), 2918 (Genesis Town Planning obo Mr Phillips), 2779 (Historic England), 3338 (Genesis Town Planning obo Mr and Mrs Ellis), 3313 (Genesis Town Planning obo Domusea), 3361(Genesis Town Planning obo Junnell Homes Ltd), 3272 (Genesis Town Planning obo Landacre Developments Ltd), 3409 (Genesis Town Planning obo Seward Properties Ltd), 2587 (Turley obo Countryside Properties), 3371 (Genesis Town Planning obo Mr Ferguson), 1158, 632, 1140 (British Horse Society), 1382, 3538, 457, 777, 660, 1875, 2571(Earnley PC), 2131, 1494, 1889, 2883 (Savills Uk obo Bloor Homes), 344, 982, 784, 3026 (Strutt and Parker LLP obo William Lacey Group), 3050 (Arun DC), 2053 (East Hampshire District Council), 1151 (Waverley Borough Council), 3416 (Genesis Town Planning obo Meadows Partnership), 3383 (Genesis Town Planning obo Mr and Mrs Tearall), 1188 (Savills UK obo Mr Pitchford), 2866 (Persimmon Homes), 1462, 732, 25 (Earnley Parish Council), 916, 911, 2026, 1158, 2192 (Environment Agency), 80, 2675 (DLP Planning Ltd obo Devonshire Developments Limited), 2693 (DMH Stallard obo Welbeck Strategic Land IV LLP), 835, 2532, 3532 (Chidham Sustainability Network), 1440 (Donnington PC), 1316 (Ms Humble obo Seaward Properties Ltd), 3534, 65, 1319, 1058, 1637, 1667, 1915, 2542 (Chichester Harbour Trust), 1446, 411, 744, 1974, 802, 714 (West Itchenor PC), 3357 (Landlink Estates Ltd), 2572 (Earnley PC), 1005, 301, 2979 (Plaistow and Ifold PC), 2699 (Dominic Lawson Bespoke Planning obo Artemis Land and Agriculture Ltd), 982, 3403 (Luken Beck MDP Ltd obo Seaward Properties Ltd), 1939, 1467, 2518 (Sidlesham PC), 1558, 978, 145, 1875, 1964, 350, 777, 200, 1641, 3424 (Genesis Town Planning obo Seaward Properties Ltd), 3515 (HMPC Ltd), 1418,1848, 362, 2989, 2989, 480, 327, 2949 (CPRE Sussex), 2246 (Historic England), 1821 (King &amp; Co obo Heaver Homes Ltd)</p>				
Summary of issues and key comments raised by residents and other respondents				
<p>Housing Numbers:</p> <ul style="list-style-type: none"> <li>Support - Policy meets identified need. 3296 (Church Commissioners), 2801 (LRM Planning Ltd obo Hallam Land Management), 2625 (Barton Wilmore obo Martin</li> </ul>				

**Grant Homes**), 2438 (**SDNP**), 2449 (**Horsham District Council**), 3139 (**PRP Architects Ltd obo Obsidian Strategic SB Ltd**)

- Object – to use of HEDNA as opposed to standard methodology. Not clearly demonstrated that exceptional circumstances exist for using OAN contained within HEDNA for calculating housing need. 3238 (**Henry Adams LLP obo Taylor Wimpey Strategic Land**), 3243 (**Henry Adams LLP obo WSCC Estates**)
- Mixes sites previously allocated and with planning permission with new allocations – unclear how housing numbers being addressed. 3354 (**Nexus Planning Ltd obo CEG**),
- Increase – housing figure should be minimum. 2779 (**ICENI projects obo Fishbourne Developments Ltd**), 2789 (**ICENI Projects obo Antler Homes** ). 2675 (**DLP Planning Ltd obo Devonshire Developments Limited**) 2918 (**Genesis Town Planning obo Mr Philips**). No flexibility with low % of allocations. 3238 (**Henry Adams LLP obo Taylor Wimpey Strategic Land**), 3243 (**Henry Adams LLP obo WSCC Estates**) Lacks clarity in regard to known commitments on strategic sites. 3354 (**Nexus Planning Ltd obo CEG**)
- Baseline and affordability factors out of date. 3551(**WYG obo Berkeley Strategic Land Ltd**)
- No account for unmet need from neighbouring authorities, not just SDNP. 3551(**WYG obo Berkeley Strategic Land Ltd**), 3317 (**Genesis Town Planning obo Landlinx Estates**), 3332 (**Genesis Town Planning obo Mr Langmead**), 3238 (**Henry Adams LLP obo Taylor Wimpey Strategic Land**), 3021(**Thakeham Homes**), 3410 (**Genesis Town Planning obo Greenwood Group Ltd**), 3243 (**Henry Adams LLP obo WSCC Estates**), 3289 (**Genesis Town Planning obo Chichester Grain Ltd**), 2631(**Barton Wilmore**), 2445 (**Adur and Worthing DC**), 3050 (**Arun DC**), 2707 (**Gladman**), 2755 (**Home Builders Federation**), 2449 (**Horsham District Council**), 1151 (**Waverley Borough Council**), 3313 (**Genesis Town Planning obo Domusea**), 3361 (**Genesis Town Planning obo Junnell Homes Ltd**), 3272 (**Genesis Town Planning obo Landacre Developments Ltd**), 3416 (**Genesis Town Planning obo Meadows Partnership**), 3338 (**Genesis Town Planning obo Mr and Mrs Ellis**), 3371 (**Genesis Town Planning obo Mr Ferguson**), 2779 (**ICENI projects obo Fishbourne Developments Ltd**), 1188 (**Savills UK obo Mr Pitchford**),
- Method used for calculating unmet need from SDNP is not standard one. 3009 (**Neame Sutton obo Castle Properties**), 3002 (**Neame Sutton Ltd obo Danescroft Land Ltd**), 2918 (**Genesis Town Planning obo Mr Philips**),
- Affordability – Significant affordability issues in District. NPPG advises the more significant, the larger the improvement to affordability is required. 25% uplift to demographic OAN is justified. 2870 (**Rodway Planning Consultancy Ltd obo Mr and Miss Butterfield and Waldron**)
- Capping of increase – CDC should meet capped requirement based on baseline position. 3002 (**Neame Sutton Ltd obo Danescroft Land Ltd**), 3013 (**Neame Sutton Ltd obo Sunley Estates**), 3009 (**Neame Sutton obo Castle Properties**).
- Object to capping of increase - 3036 (**Sigma Planning Services obo Rydon Homes Ltd**)
- Standard method in PPG suggests need assessment flawed as adopted plan already fails to meet need. 3317 (**Genesis Town Planning obo Landlinx Estates**), 3222 (**Genesis Town Planning obo Elberry Properties Ltd**), 3036 (**Sigma Planning Services obo Rydon Homes Ltd**), 3289 (**Genesis Town Planning obo Chichester Grain Ltd**), 3410 (**Genesis Town Planning obo Greenwood Group Ltd**), 3332 (**Genesis Town Planning obo Mr Langmead**), 3385 (**Genesis Town Planning obo Miss Newman**), 3301 (**Luken Beck MDP Ltd obo Barratt Homes**),
- Decrease – Need further justification for increase in housing requirement. Housing figure should be reduced to reflect 2016 ONS projections. No attempt to apply

<p>sensitivity analysis to single end figure. 961(<b>Birdham PC</b>)</p> <ul style="list-style-type: none"> <li>• Infrastructure cannot cope with level of proposed development and figure should be decreased to allow for this. Unlikely that level of housing predicted are going to be needed.</li> <li>• Object to use of word minimum – makes it difficult for communities to resist further development. 25 (<b>Earnley Parish Council</b>).</li> <li>• In order to deliver, less emphasis should be placed on sites coming forward through Neighbourhood Plan process. More allocations to ensure housing delivered evenly. Some issues will be difficult for Neighbourhood Plans to tackle (Infrastructure).3317 (<b>Genesis Town Planning obo Landlinx Estates</b>), 3354 (<b>Nexus Planning Ltd obo CEG</b>), 2693 (<b>DMH Stallard obo Welbeck Strategic Land IV LLP</b>), 1316 (<b>Ms Humble obo Seaward Properties Ltd</b>)</li> </ul>
<p>Buffer on HLS</p> <ul style="list-style-type: none"> <li>• 1% buffer insufficient. 20% buffer on land supply needed to ensure delivery. 2755 (<b>Home Builders Federation</b>), 3021(<b>Thakeham Homes</b>), 2604 (<b>Boyer Planning obo Welbeck Strategic Land IV LLP</b>), 2707 (<b>Gladman</b>), 3296 (<b>Church Commissioners for England</b>), 2745 (<b>Gleeson Strategic Land</b>)</li> </ul>
<p>Trajectory</p> <ul style="list-style-type: none"> <li>• Should be included in line with NPPF para. 73. 2755 (<b>Home Builders Federation</b>), 2918 (<b>Genesis Town Planning obo Mr Philips</b>), 3021(<b>Thakeham Homes</b>), 3354 (<b>Nexus Planning Ltd obo CEG</b>), 2779 (<b>ICENI projects obo Fishbourne Developments Ltd</b>), 2587 (<b>Turley obo Countryside Properties</b>),</li> <li>• Plan should allocate range of sites to ensure provision is even across plan period. Should not have a stepped trajectory. 2755 (<b>Home Builders Federation</b>), 3301 (<b>Luken Beck MDP Ltd obo Barratt Homes</b>),</li> <li>• Need trajectory for large sites. 3410 (<b>Genesis Town Planning obo Greenwood Group Ltd</b>), 3338 (<b>Genesis Town Planning obo Mr and Mrs Ellis</b>), 3371 (<b>Genesis Town Planning obo Mr Ferguson</b>), 3332 (<b>Genesis Town Planning obo Mr Langmead</b>), 3222 (<b>Genesis Town Planning obo Elberry Properties Ltd</b>), 3289 (<b>Genesis Town Planning obo Chichester Grain Ltd</b>), 3313 (<b>Genesis Town Planning obo Domusea</b>), 3361(<b>Genesis Town Planning obo Junnell Homes Ltd</b>), 3272 (<b>Genesis Town Planning obo Landacre Developments Ltd</b>), 3409 (<b>Genesis Town Planning obo Seward Properties Ltd</b>),</li> </ul>
<p>Windfall/Small sites</p> <ul style="list-style-type: none"> <li>• Clarify definition of windfall sites in Local Plan glossary to meet the ‘consistent with national policy’ test of soundness. 3371 (<b>Genesis Town Planning obo Mr Ferguson</b>)</li> <li>• Support allowance. 3371 (<b>Genesis Town Planning obo Mr Ferguson</b>), 3317 (<b>Genesis Town Planning obo Landlinx Estates</b>), 3332 (<b>Genesis Town Planning obo Mr Langmead</b>), 3410 (<b>Genesis Town Planning obo Greenwood Group Ltd</b>), 3385 (<b>Genesis Town Planning obo Miss Newman</b>),</li> </ul>
<p>SDNP</p> <ul style="list-style-type: none"> <li>• Object – SDNP should meet own requirement – would assist in alleviating congestion on A259 corridor, will enhance vitality of rural communities. 1140 (<b>British Horse Society</b>), 2571(<b>Earnley PC</b>)</li> <li>• Object – overall housing figure should increase as does not meet unmet need in SDNP. 2883 (<b>Savills Uk obo Bloor Homes</b>)</li> <li>• Support – SDNP welcome uplift to housing target to address unmet need arising from SDNP. 2438 (<b>SDNP</b>), 3026 (<b>Strutt and Parker LLP obo William Lacey Group</b>)</li> </ul>
<p>Evidence</p> <ul style="list-style-type: none"> <li>• Clarify supporting evidence on capacity to deliver housing numbers. 3050 (<b>Arun DC</b>), 2449 (<b>Horsham District Council</b>), 3026 (<b>Strutt and Parker LLP obo William</b></li> </ul>

<p><b>Lacey Group),</b></p> <ul style="list-style-type: none"> <li>• Making supporting evidence clearer on links between housing and employment. 2707 (<b>Gladman</b>),</li> <li>• SoCGs are required. 3050 (<b>Arun DC</b>), 2866 (<b>Persimmon Homes</b>),</li> <li>• SA flawed as Rydon only assessed impact 800dpa. 3036 (<b>Sigma Planning Services obo Rydon Homes Ltd</b>)</li> <li>• Study of existing housing stock required to assess vacancy prior to building new homes.</li> </ul>
<p>Local need:</p> <ul style="list-style-type: none"> <li>• Housing should reflect local demand including affordable and sheltered housing</li> <li>• Occupation and purchase should be restricted to local residents and prevented from being second homes.</li> </ul>
<p>Infrastructure:</p> <ul style="list-style-type: none"> <li>• Additional infrastructure required to cope with proposed development, including improvements to A27</li> </ul>
<p>Housing distribution (East-West Corridor):</p> <ul style="list-style-type: none"> <li>• Infrastructure cannot cope (A259/A27/Fishbourne roundabout). Impact on AONB/sensitive locations south of A259 and tourism. 2542 (<b>Chichester Harbour Trust</b>)</li> <li>• The difference between Option 1 and 1A is said to be that option 1A reduces the scale of development on Manhood and redistributes it to Southbourne, Hunston and Tangmere. However for some reason Chidham and Hambrook allocation reduces from 600 in Option 1 to 500 in Option 1A and there is no explanation or justification for this reduction. The 600 unit allocation for Hambrook in Option 1 should have been carried forward in Option 1A as it has a railway station and the 700 bus route. Then reduce 200 unit allocation for Hunston to 100 as it less sustainable location.</li> <li>• Consider housing allocation North of Chichester and south of SDNP</li> </ul>
<p>Housing distribution (Manhood Peninsula):</p> <ul style="list-style-type: none"> <li>• Scale of development would negatively impact on tourist industry and economy.</li> <li>• Poor infrastructure (employment, transport, facilities) on Peninsula, scale of development will exacerbate existing situation. 1440 (<b>Donnington PC</b>), 714 (<b>West Itchenor PC</b>), 2572 (<b>Earnley PC</b>),</li> </ul>
<p>Housing distribution (North of plan area):</p> <ul style="list-style-type: none"> <li>• Increase allocation to alleviate impact on east-west corridor. 2699 (<b>Dominic Lawson Bespoke Planning obo Artemis Land and Agriculture Ltd</b>),</li> <li>• Allocation exceeds the amount needed – limited employment, services, infrastructure. 2979 (<b>Plaistow and Ifold PC</b>),</li> </ul>
<p>Housing distribution (general):</p> <ul style="list-style-type: none"> <li>• Allocate range of sites to ensure provision comes forward evenly. 3021(<b>Thakeham Homes</b>),</li> </ul>
<p>Policy wording:</p> <ul style="list-style-type: none"> <li>• Policy should have criteria based approach to development on edge of settlement 2707 (<b>Gladman</b>),</li> <li>• Suggested criteria for Local Plan to assess sites is the same as suggested for Neighbourhood Plans. 2192 (<b>Environment Agency</b>)</li> <li>• The proposed policy wording is not positively prepared, consistent with national policy nor will it be effective in delivering the District's full local housing need in sustainable locations, such as the Settlement Hubs and Service Villages. 3403 (<b>Luken Beck MDP Ltd obo Seaward Properties Ltd</b>)</li> </ul>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p>
<p>A refresh of the Housing and Economic Development Needs Assessment has been commissioned to provide an up-to-date assessment of the housing needs of the plan area, taking into account national planning policy and guidance. This will also address they types</p>

and tenure of housing required.

A housing trajectory will accompany the next stage of the plan to demonstrate the delivery of sites.

Statements of Common Ground will be sought with neighbouring authorities to document the extent to which agreement is reached on strategic planning matters, including meeting housing need. In its signed Statement of Common Ground with the South Downs National Park Authority, the District Council undertakes that, subject to the completion of the ongoing evidence-based work and the assessment of sites to meet the identified housing needs associated with the Local Plan Review, the Council will assess its ability to meet some or all of the unmet housing need arising from the part of the national park within Chichester District. It was also agreed that CDC will not commit to accommodating unmet housing need from elsewhere in the national park other than through the work of the West Sussex and Greater Brighton Strategic Planning Board.

The Council is updating the Housing and Economic Land Availability Assessment and associated evidence base to consider further the capacity of the plan area to meet the development targets identified.

Concerns over the distribution of development are acknowledged. The ongoing Sustainability Appraisal and other evidence will continue to test and refine the distribution with regards to environmental impacts and other considerations.

This policy will need consequential updating to reflect the increase in Plan period to 2036, planning permissions and completions since the preferred approach was published.

<b>Policy S5: Parish Housing Needs</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 11	11	2	4	5
Policy: 196	203	11	153	39
Representation numbers				
<p>3006 (Neame Sutton obo Danescroft Land Ltd), 661, 153, 2446 (Horsham District Council), 2439 (SDNP), 1274 (HMPC Ltd), 2625 (Barton Willmore obo Martin Grant Homes), 3356 (Nexus Planning Ltd obo CEG), 1807 (King and Co obo Heaver Homes Ltd), 3141 (PRP Architects obo Obsidian Strategic SB Limited), 1607 (Harbour Villages Lib Dems Campaign Team), 571, 2708, 1511 (Wisborough Green Parish Council), 3027 (Strutt and Parker LLP obo William Lacey Group), 2746 (Gleeson Strategic Land), 3304 (Church Commissioners for England), 1118 (Batcheller Monkhouse obo Alan Hutchings), 2780 (ICENI Projects obo Fishbourne Developments Ltd), 2686 (DMH Stallard LLP obo Spiby Partners Ltd), 2682 (DMH Stallard LLP obo Reside Developments), 1627, 2694 (DMH Stallard obo Wellbeck Strategic Land (IV) LLP), 3125 (Savills obo D R Pick Grandchildren's settlement), 3304 (Church Commissioners for England), 3237, 1084, 523, 571, 2980 (Plaistow and Ifold Parish Council), 963 (Birdham Parish Council), 3457, 1511 (Wisborough Green Parish Council), 995 (Birdham Parish Council), 427, 476, 2543 (Chichester Harbour Trust), 849, 715 (West Itchenor Parish Council), 1499, 302, 1451, 1332, 3358 (Landlink Estates), 2626 (Barton Willmore obo Martin Grant Homes), 1524 (Lewis and Co Planning), 1760, 3297 (Church Commissioners for England), 3333 (Genesis Town Planning obo Samuel Langmead), 3046 (Henry Adams Planning Ltd obo Mr and Mrs Green), 3425 (Genesis Town Planning obo Seaward Properties Ltd), 1073, 1348, 2689, 3314 (Savills obo WSCC), 3233 (Henry Adams Ltd obo Trustees of CL Meighar Lovett Will Trust), 3381 (Genesis Town Planning obo Mr and Mrs Tearall), 1901, 1317 (Seaward Properties), 293, 3411 (Genesis Town Planning obo Seaward Properties), 3273 (Genesis Town Planning obo Landacre Developments Ltd), 2604 (Boyer Planning obo Welbeck Strategic), 3039 (Henry Adams Planning Ltd obo Mr Rudsedski), 1585, 3552 (WYG obo Berkeley Strategic Land Ltd), 31, 39, 40, 41, 42, 43, 136, 138, 139, 140, 141, 142, 143, 174, 183, 185, 186, 212, 214, 223, 228, 282, 283, 305, 310, 375 (Loxwood Society), 533, 535, 537, 567, 614, 642, 731, 748, 767, 979, 983, 1013 (Councillor Wilding), 1053, 1054, 1055, 1056, 1063, 1064, 1070, 1071, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1088, 1094, 1100, 1103, 1107, 1184, 1233, 1280, 1285, 1288, 1293, 1383, 1424, 1427, 1430, 1431, 1432, 1433, 1470, 1486, 1568, 1857, 1902, 1903, 1905, 1908, 1909, 1910, 1911, 1912, 1913, 1967, 1969, 1982, 2023, 2048, 2052, 2058, 2063, 2155, 2234, 2328, 2352, 2573 (Earnley Parish Council), 2690, 2696, 2701, 2716, 2753, 2762, 2765, 2774, 2775, 2792, 2849, 2850, 2916, 3052, 3157, 3269 (Loxwood Parish Council), 3319 (Genesis Town Planning obo Landlink Estates Ltd), 2790 (ICENI Projects obo Antler Homes Ltd), 3023 (Thakeham Homes), 3011 (Neame Sutton Ltd obo castle Properties), 2835 (Verve Planning obo Casa Coevo), 3339 (Genesis Town Planning obo Mr and Mrs Ellis), 933 (Pagham Parish Council), 3386 (Genesis Town Planning obo Ms Newman), 2677 (DLP Planning Ltd obo Devonshire Developments Ltd), 3318 (Genesis Town Planning obo Domusea), 3047 (Henry Adams Planning Ltd obo Mr and Mrs Chitty), 3041 (Henry Adams Planning Ltd obo Mr and Mrs Bell), 3363 (Genesis Town Planning obo Junnell Homes Ltd), 3412 (PRP Architects obo Obsidian Strategic SB Ltd), 3264 (Henry Adams LLP obo WSCC), 1189 (Savills UK obo Mr Pitchford), 3250 (Henry Adams LLP obo WSCC), 3239 (Henry Adams LLP obo Taylor Wimpey Strategic), 703, (Paul Newman Property Consultants Ltd) 3227 (Henry Adams Ltd obo J Pitts), 3376 (Genesis Town Planning obo Mr Ferguson), 3418 (Genesis Town Planning obo Meadows Partnership), 3265 (Henry Adams LLP obo WSCC)</p>				
Summary of issues and key comments raised by residents and other respondents				
<p>Strategy (support):</p> <ul style="list-style-type: none"> <li>Support – identification of parish specific housing requirements to provide certainty to local communities (<b>SDNP</b>)</li> </ul>				

<ul style="list-style-type: none"> <li>Supportive of concept of creating new settlement rather than continuous growth of existing villages (<b>Wisborough Green PC</b>)</li> </ul>
<p>Strategy (object):</p> <ul style="list-style-type: none"> <li>Parish estimates are conservative and should not be viewed as target. Greater flexibility in production of Neighbourhood Plans encouraged (<b>HMPC Ltd</b>)</li> <li>Any allocation over 100 dwellings should be considered strategic and allocated through LPR (<b>British Horse Society</b>)</li> <li>Object - Policy misleading as to extent of allocations being passed to NPs. No justification for difference in housing figures attributed to parishes. Title misleading as implies parishes with strategic allocations have a 0 number to meet. (<b>CEG</b>)</li> <li>Policy S5 is drafted to identify residual Parish requirements having regard for strategic allocations. If a strategic allocation were to fail to be delivered or would realise a lower yield, this mechanism would provide no opportunity to deliver those latent requirements in other sustainable locations within the Parish boundary. The policy should be restructured to identify the Parish requirement (i.e. 1300 for Tangmere) and then say that this amount is proposed to be delivered on an allocation site. In the event that the allocation under-delivers, then consideration should be given to alternate locations (<b>Heaver Homes Ltd</b>)</li> <li>No evidence why certain parishes do not have allocations</li> <li>Over reliance on strategic sites</li> <li>SDNP need to accept own allocation of development</li> </ul>
<p>Neighbourhood Plans (Support)</p> <ul style="list-style-type: none"> <li>Welcome commitment to allocate sites through DPD if NP do not progress (<b>Church Commissioners for England</b>)</li> <li>Approach to identifying small sites</li> <li>Approach of intervening in NP if not reach sufficient stage but concern NP take time and this could prevent sustainable development coming forward.</li> </ul>
<p>Neighbourhood Plans (Object)</p> <ul style="list-style-type: none"> <li>Insufficient time allocated to take NP to examination (<b>Wisborough Green PC</b>)</li> <li>Too much emphasis on sites coming forward through NPs. Should be more strategic sites</li> </ul>
<p>Policy wording:</p> <ul style="list-style-type: none"> <li>Strategic allocations should be shown in table (<b>William Lacey Group</b>)</li> <li>Amend to allow for consideration of sites in suitable locations where NP not been submitted for examination within 6 months of LP adoption.</li> <li>Confirm housing numbers are a minimum to ensure deliver required number</li> </ul>
<p>HEELA:</p> <ul style="list-style-type: none"> <li>Proposed site ref: HOV0016 (<b>Church Commissioners for England</b>)</li> </ul>
<p>Second Home Policy:</p> <ul style="list-style-type: none"> <li>Introduce second home policy to prevent over dominance new homes being sold as second homes</li> </ul>
<p>Parish numbers (Birdham) object:</p> <ul style="list-style-type: none"> <li>Birdham accepting unreasonable proportion housing development which is not supported by additional infrastructure – suggest 50 dwellings (<b>Birdham PC</b>)</li> <li>Impact of allocation on AONB</li> <li>Land west of Bell Lane should be included (<b>Martin Grant Homes</b>)</li> </ul>
<p>Parish numbers (Birdham) support:</p> <ul style="list-style-type: none"> <li>Village has potential to accommodate higher numbers as demonstrated by HEELA (<b>Lewis and Co Planning</b>)</li> <li>Support allocation of 125 dwellings. 25 dwellings at Church Road Birdham (<b>Samuel Langmead represented by Genesis Town Planning</b>)</li> </ul>
<p>Parish numbers (Bosham) object:</p>

<ul style="list-style-type: none"> <li>• Housing figure should be increased.</li> <li>• Strategic allocation for entire housing requirement overlooks potential capacity for smaller sites to come forward within and adjoining built up area (<b>Seaward Properties</b>)</li> <li>• Object to in principle ruling out of sites within AONB (<b>Seaward Properties</b>)</li> </ul>
<p>Parish numbers (Boxgrove) object:</p> <ul style="list-style-type: none"> <li>• Parish numbers unjustified</li> <li>• Additional development will have negative impact on infrastructure</li> </ul>
<p>Parish numbers (Chichester) Object:</p> <ul style="list-style-type: none"> <li>• Parish numbers should increase – additional land at the Tannery Site (<b>WSCC</b>), Land at Salthill Park (<b>Henry Adams obo Trustees of CL Meighar Lovett Will Trust</b>)</li> </ul>
<p>Parish numbers (Chidham and Hambrook) object:</p> <ul style="list-style-type: none"> <li>• Object to nil allocation in Policy S5 – implies all development within strategic allocation. Overlooks capacity for unidentified sites to come forward. Propose land at Broad Road. Amend settlement boundary at Broad Road (<b>Genesis Town Planning obo Mr and Mrs Tearall and 1 other</b>)</li> </ul>
<p>Parish numbers (Earnley) object:</p> <ul style="list-style-type: none"> <li>• Lack of development plan. Propose land south of Clappers Lane (<b>Seaward Properties</b>)</li> </ul>
<p>Parish numbers (Kirdford) object</p> <ul style="list-style-type: none"> <li>• Land south of Townfield should be allocated site (<b>Welbeck Strategic Land IV LLP represented by Boyer Planning</b>)</li> </ul>
<p>Parish numbers (Fishbourne) object:</p> <ul style="list-style-type: none"> <li>• Building on Bethwines Farm would erode separate identity of village</li> <li>• Object to nil allocation in Policy S5 and full allocation in strategic allocation. Development should be spread throughout village as part of dispersed strategy (<b>Genesis Town Planning obo Seaward Properties</b>) (<b>Genesis Town Planning obo Landacre Developments Ltd</b>).</li> </ul>
<p>Parish numbers (Lavant) Object:</p> <ul style="list-style-type: none"> <li>• Lavant underproviding and should have parish number of around 206 – Raughmere Farm (<b>WYG obo Berkeley Strategic Land Ltd</b>)</li> </ul>
<p>Development at Loxwood (object):</p> <ul style="list-style-type: none"> <li>• Insufficient overall infrastructure - sewage capacity, no surface water drainage, lack of employment, lack of educational provision, no local facilities (shop), no mains gas, lack of public transport, insufficient capacity on local roads</li> <li>• Unsustainable location</li> <li>• Flood risk</li> <li>• Environmental impact</li> <li>• Loss of character of village</li> <li>• No demand for additional housing</li> <li>• Increase the requirement - 1.9ha of land available at Loxwood House, Guildford Road adjacent to Loxwood Nursery Neighbourhood Plan allocation (<b>Genesis Town Planning obo Landlinx Estates Ltd</b>)</li> </ul>
<p>Development at Loxwood (Support)</p> <ul style="list-style-type: none"> <li>• Support development and increase in allocation (<b>ICENI Projects obo Antler Homes</b>) (<b>Thakeham Homes</b>) (<b>Neame Sutton Ltd obo Castle Properties</b>)</li> </ul>
<p>Development at Lynchmere (object)</p> <ul style="list-style-type: none"> <li>• Lynchmere should have housing figure – land to rear of Sturt Avenue (<b>Verve Planning obo Casa Coevo</b>)</li> </ul>
<p>Development at North Mundham (object):</p> <ul style="list-style-type: none"> <li>• Proposed settlement boundary extension discordant and remote from settlement and extends excessively north</li> <li>• Insufficient capacity on road network</li> </ul>

<ul style="list-style-type: none"> <li>• Distribution of development does not reflect facilities found in village</li> <li>• Housing figure should be increased and the LPR should allocate sites – land south of B2166 (<b>DLP Planning Ltd obo Devonshire Developments</b>), Pigeon House Farm (<b>Genesis Town Planning obo Domusea</b>), land at Stoney Meadow Farm (<b>Henry Adams Ltd obo Mr and Mrs Bell</b>), land east of The Spinney (<b>Genesis Town Planning obo Junnell Homes Ltd</b>)</li> </ul>
<p>Development at Sidlesham (object):</p> <ul style="list-style-type: none"> <li>• Sidlesham should have housing figure – promote land at Greenwood Nursery, Highleigh Road (<b>Genesis Town Planning obo Greenwood Group</b>)</li> </ul>
<p>Development at Tangmere (object):</p> <ul style="list-style-type: none"> <li>• Increase housing numbers – allocate land at Tangmere Apron (<b>Henry Adams obo WSCC</b>)</li> </ul>
<p>Development at Wisborough Green (object):</p> <ul style="list-style-type: none"> <li>• Housing numbers too low (<b>Savills UK obo Mr Pitchford</b>)</li> </ul>
<p>Development at Westbourne (object):</p> <ul style="list-style-type: none"> <li>• Housing should be allocated to Westbourne (<b>Henry Adams obo Taylor Wimpey Strategic</b>) (<b>Paul Newman Property Consultants Ltd</b>)</li> </ul>
<p>Development at Westhampnett (object):</p> <ul style="list-style-type: none"> <li>• Sufficient land to accommodate development (<b>Henry Adams obo J Pitts</b>)</li> </ul>
<p>Development at West Wittering (object):</p> <ul style="list-style-type: none"> <li>• West Wittering should take greater share of development (Bramber Nursery) (<b>Genesis Town Planning obo Mr Ferguson</b>) (<b>Genesis Town Planning obo The Meadows Partnership</b>) (Ellanore Lane)(<b>Henry Adams LLP obo WSCC</b>)</li> </ul>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p>
<p>Comments regarding the overall strategy are noted. On balance it is considered the overall approach of setting out a mixture of strategic allocations and parish figures is appropriate. However, further iterations of the Plan should set out in a clearer manner the overall distribution of development.</p> <p>Comments regarding the approach to neighbourhood plans are noted. The approach strikes a balance between providing opportunity for communities to guide development in neighbourhood plans and provide sufficient certainty that development will be delivered. The Council is bringing forward a housing strategy to consider housing matters alongside the new Local Plan.</p> <p>Nearly all parish figures are objected to, with concerns over infrastructure, lack of capacity countered by parties seeking to promote additional or alternative sites. Promoted sites will be considered where appropriate through a refresh of the Housing and Economic Land Availability Assessment, and if necessary through further Sustainability Appraisal work. Concerns over the distribution of development are acknowledged. The ongoing Sustainability Appraisal and other evidence will continue to test and refine the distribution with regards to environmental impacts and other considerations.</p>

<b>Policy S6 Affordable Housing</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 8	8	0	4	4
Policy: 35	37	7	13	17
Representation numbers				
2519 (Sidlesham PC), 2578 (Earnley PC), 989, 1330, 1248 (North Mundham PC), 2758, 3029, 1921, 2588, 2886, 2224, 1512, 956, 2982 (Plaistow & Ifold PC), 3299, 2871, 428, 1609, 1713, 81, 2632, 2655, 1646, 879, 1400, 663, 913, 1947, 3218, 3486, 108, 2496 (Chidham & Hambrook PC), 1642, 3278 (Westbourne PC), 1609, 2454 (Southbourne PC), 2378, 3548, 1355, 1247 (North Mundham PC), 2440 (SDNPA), 1108, 1347, 2991, 1176, 1608				
Summary of issues and key comments raised by residents and other respondents				
Support for policy: <b>(Plaistow &amp; Ifold PC, Westbourne PC, SDNPA )</b>				
Viability: <ul style="list-style-type: none"> <li>• Viability evidence should be published by housebuilders to justify the % of affordable housing within developments to ensure transparency</li> <li>• Important that whole plan viability testing reflects PPG</li> <li>• There is too much flexibility in allowing developers to not fulfil their required quota <b>(Southbourne PC)</b>.</li> </ul>				
Percentage of affordable housing: <ul style="list-style-type: none"> <li>• Consideration of the 30% figure in relation to further viability evidence <b>(Harbour Villages Lib Dems Campaign Team)</b>.</li> <li>• Suggest increasing the percentage of affordable housing in proportion to location of services transport infrastructure i.e. higher in Chichester city centre where rail and A27 links are good compared to more rural communities.</li> </ul>				
Other sources of affordable housing: <ul style="list-style-type: none"> <li>• Bring empty homes into use as a solution for affordable housing</li> <li>• Suggest including reference to Community Land Trusts (CLT) within policy to demonstrate fully the intention from para 4.45 <b>(Westbourne PC)</b>.</li> <li>• Include Social Housing, Build to Rent, Self-Build, Starter Homes, Discounted Market Homes, as additional options for affordable housing that are in accordance with NPPF definitions of affordable housing.</li> <li>• Include specialist housing for disabled and the elderly, including care and nursing homes.</li> </ul>				
Housing tenures mix: <ul style="list-style-type: none"> <li>• Ensure suitable mix within developments to account for changing demographics of the area, in particular the ageing population.</li> <li>• Many elderly people want to downsize and young people want small starter homes. More small homes should be built to accommodate all this.</li> </ul>				
Wording of policy allows for too much flexibility; affordable housing should relate closely to local income levels <b>(Southbourne PC)</b>				
Clarify most up to date definition of affordable housing to comply with NPPF <b>(Harbour Villages Lib Dems Campaign Team)</b>				
Initial Council response to issues raised and way forward for the Local Plan Review				
Comments on viability evidence are noted. The policy makes it clear an “open book” approach would be required if viability concerns are raised on development proposals.				

Further work is currently being undertaken on testing the percentage of affordable housing can and should be sought on larger market housing developments.

Comments on other sources of affordable housing, and housing tenures mix refer to elements which are outlined in detail in policy DM2 of the Preferred Approach Plan. Other comments refer to other specialist housing which is set out in policy DM1. The next iteration of the plan should make the linkages between these policies clearer.

Concerns that the policy is too flexible will be considered further in light of comments made in response to policy DM2.

Finally, the current definition of affordable housing *for planning purposes* should be included in the supporting text to make it clearer what the policy is seeking to secure.

<b>Policy S7 – Meeting Gypsies, Travellers and Travelling Showpeoples’ Needs</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 1	1	0	1	0
Policy: 11	11	4	4	3
Representation numbers				
30, 82, 364, 429, 430, 482, 852, 2345, 2441 (South Downs National Park Authority), 2447 (Horsham District Council), 2522 (Sidlesham Parish Council), 3287 (Westbourne Parish Council)				
Summary of issues and key comments raised by residents and other respondents				
Support for Policy with some clarification of wording ( <b>Horsham District Council</b> ), ( <b>South Downs National Park Authority</b> )				
Suggested updates to wording <ul style="list-style-type: none"> <li>Open to misinterpretation: amend final sentence to: Existing PERMITTED traveller sites will be safeguarded.</li> </ul>				
Object to approach <ul style="list-style-type: none"> <li>Need cannot be met. Restricting site selection unrealistic; sites need to be found including outside settlement boundaries. Criteria based policy required; must be flexible.</li> <li>Policy should avoid overconcentration of GTTS dwellings in one location. (<b>Westbourne Parish Council</b>) (<b>Sidlesham Parish Council</b>)</li> <li>Concern that Westbourne NP will not carry so much weight if policy is made. (<b>Westbourne Parish Council</b>)</li> </ul>				
Object to evidence <ul style="list-style-type: none"> <li>Inadequate/flawed evidence base. Challenge GTAA to avoid over provision. (<b>Westbourne Parish Council</b>)</li> <li>No national evidence number of plots should be more than that defined in adopted Local Plan. Numbers derived from the G&amp;T Community, which could be biased.</li> </ul>				
Definition <ul style="list-style-type: none"> <li>Many gypsies/travellers qualify under definition but do not fit definition. Issues of resentment especially in communities with social housing need/pressure on school places. Criteria for assessment must be reviewed together with the transition to settled status. (<b>Sidlesham Parish Council</b>)</li> <li>Ensure people claiming to be of traveller and gypsy heritage are genuine in a direct line of descent.</li> </ul>				
Pitch size <ul style="list-style-type: none"> <li>Each pitch should have a maximum size to bring it in line with the settled community (can be around 40 homes per hectare). A similar constraint should be applied to the Travelling Community.</li> </ul>				
Site details <ul style="list-style-type: none"> <li>Sites for more than 6 units should be within easy reach of the A27; all allocated sites should be proportionate in size and scale to the existing settlement.</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
Comments regarding the evidence base are noted. Detailed comments have been provided by the consultants which are set out in <b>a supplement to</b> this report. It is considered that the plan would benefit from a section providing greater detail on how the provision of Gypsies, Travellers and Travelling Showpeoples’ sites. This will provide greater clarity and certainty for all parties on how the identified need is likely to be met. It is accepted that the policy wording may need further refining for clarity, and any changes				

will be considered in the next iteration of the plan.

<b>Policy S8 Employment Needs</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 11	11	3	4	4
Policy: 19	20	3	13	4
Representation numbers:				
431, 458, 602, 666, 725, 776, 814, 926, 1203, 1275 (HMPC obo Goodwood Estates), 1513, 1586, 1636, 1639, 1666, 1717 (Harbour Villages Lib Dem Campaign), 1670, 2448 (Horsham District Council, 2494 (Chidham and Hambrook PC), 2633, 2700, 2709, 2852, 2966, 2892, 2993, 3150 (Rolls Royce), 3244 (WSCC Estates), 3316 (Savills obo WSCC), 3477,3553				
Other reps related to this policy: 98, 285, 318, ,338, 385, 513, 608, 636, 700, 769, 781, 850, 874, 1008, 1190, 1344, 1351,1398, 1421, 1447 (Donnington PC),1448, 1484,1742, 1794, 1805, 1852, 1891, 2374 (Birdham PC) , 2570 (Birdham PC), 2635, 3051 (Arun DC), 3460, 3526 (West Wittering PC), 3545				
Summary of issues and key comments raised by residents and other respondents				
Support				
<ul style="list-style-type: none"> <li>• General support (<b>Horsham DC</b>)</li> <li>• Support flexible approach to leisure and community use</li> </ul>				
Need a clearer vision				
Consider jobs homes balance				
<ul style="list-style-type: none"> <li>• Clarify commuting implications and related transport mitigation (<b>Arun DC</b>)</li> <li>• Consider if a housing uplift is needed to match jobs</li> </ul>				
Number too high				
<ul style="list-style-type: none"> <li>• No need for large allocation at AL6</li> <li>• Forecasts too ambitious – economic uncertainty (<b>WSCC Estates</b>)</li> <li>• Need is for smaller businesses on brownfield sites / smaller better connected sites</li> <li>• Need an up to date Employment Land Review</li> </ul>				
Alternative general or specific locations proposed				
<ul style="list-style-type: none"> <li>• Area around Goodwood including the land proposed to be removed from AL4 (Westhampnett/NE Chichester)/ within the noise buffer. (<b>Donnington PC, Birdham PC, Harbour Villages Lib Dem Campaign</b>)</li> <li>• 2 sites at Westhampnett and Rolls Royce Car Park (<b>Goodwood Estates</b>)</li> <li>• Land for future expansion of Rolls Royce (<b>Rolls Royce</b>)</li> <li>• General area around Lavant and West Broyle (not site specific)</li> <li>• Land at Crouchlands Farm (as part of mixed use development)</li> <li>• Use brownfield sites/focus on regenerating the city centre</li> <li>• Suggestion that providing employment space to north of Chichester would better serve residents of the national park.</li> </ul>				
Policy wording				
<ul style="list-style-type: none"> <li>• Should be more flexible – could prevent development (<b>WSCC</b>)</li> <li>• Don't limit to B1-B8 (<b>WSCC Estates</b>)</li> <li>• Reflect CIL viability evidence which suggested viability constraints on B1-B8</li> </ul>				
Other				
<ul style="list-style-type: none"> <li>• Many objections to AL6 Land SW of Chichester (these are covered in more detail against that policy) (<b>Donnington PC, Birdham PC, West Wittering PC, Harbour Villages Campaign Team</b>)</li> <li>• Object to loss of green fields, impact on wildlife, landscape, traffic</li> </ul>				

- Need to safeguard food production
- Support flexible working space close to homes to reduce need to travel
- Note that jobs have been lost on the Manhood
- Note that there are limited opportunities in Chidham and Hambrook and little demand for existing premises there **(Chidham and Hambrook PC)**
- Supports improvements to telecommunications
- Need well paid high quality jobs rather than warehousing **(Harbour Villages Lib Dem Campaign Team)**

#### Initial Council response to issues raised and way forward for the Local Plan Review

The overall need for additional employment floorspace is being considered in an update to the Housing and Economic Development Needs Assessment. This will consider more recent evidence on economic trends, and also include consider further the balance between homes and jobs and they types of employment land needed.

An Employment Land Review is underway which will also provide additional detailed evidence on existing employment sites to inform the final Plan approach.

Further evidence on draft allocations, and proposed additional sites will be considered where appropriate through a refresh of the Housing and Economic Land Availability Assessment, and if necessary through further Sustainability Appraisal work.

Consideration will be given to the need to safeguardland for future expansion of Rolls Royce.

Viability evidence has been commissioned and the results will inform the next iteration of the Plan, including the approach to employment land.

The significant number of objections to policy AL6 are noted. These are considered further in that summary, but the concerns over the need for and deliverability of that site are

<b>Policy S9 Retail Hierarchy and Sequential Approach</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 8	9	4	5	0
Policy: 17	18	2	9	7
Representation numbers				
1416, 1417, 1441, 1445, 668, 1720, 2994, 2967, 880, 988, 2856, 969, 2589 (Turley obo Countryside Properties), 2590 (Turley obo Countryside Properties), 1172 (Genesis Town Planning obo Rawleigh Property Management), 1669 (Chichester BID), 2634 (Barton Willmore), 1276 (HMPC Ltd obo Goodwood Estate), 969 (Chichester Conservation Area Advisory Committee), 3281 (Westbourne PC), 444, 431, 1856, 1153, 455, 510, 1640, 1673,				
Summary of issues and key comments raised by residents and other respondents				
Retail centre issues: <ul style="list-style-type: none"> <li>• Night time economy causes problems</li> <li>• Health of city centre not resilient</li> </ul>				
Retail hierarchy: <ul style="list-style-type: none"> <li>• Support hierarchy (<b>Westbourne Parish Council</b>)</li> <li>• Suggest changes to retail hierarchy (<b>Genesis Town Planning obo Rawleigh Property Management</b>) (<b>Turley obo Countryside Properties</b>)</li> <li>• Need to identify local retail parades which are distinct from local centres</li> <li>• Need to clarify terminology (<b>Genesis Town Planning obo Rawleigh Property Management</b>)</li> </ul>				
Retail frontages: <ul style="list-style-type: none"> <li>• Reducing primary shopping frontage shrinks range of retail offering</li> <li>• Online shopping destroying secondary/tertiary frontages</li> </ul>				
Retail offering: <ul style="list-style-type: none"> <li>• Offering should be more flexible</li> <li>• Offering should be expanded</li> <li>• Concerns about vacancy – reduce business rates or use for housing</li> <li>• Support promotion of retail offering (<b>Chichester Conservation Area Advisory Committee</b>)</li> <li>• Shops should be more affordable to support local citizens</li> <li>• More to be done to support small businesses</li> <li>• Overstock of bricks and mortar shopping (<b>Chichester BID</b>)</li> <li>• Should extend further than traditional High Street interpretation (<b>HMPC Ltd obo Goodwood Estate</b>)</li> <li>• Too many restaurants, not enough shops</li> </ul>				
Local centre: <ul style="list-style-type: none"> <li>• Remove Southern Gateway from Chichester local centre area until A27 is sorted</li> <li>• Support development of local centre at Tangmere (<b>Turley obo Countryside Properties</b>)</li> <li>• Widening area of Chichester city centre would make centre less easily accessible</li> </ul>				
Retail parks <ul style="list-style-type: none"> <li>• Retail parks damage city centre</li> <li>• Development should be restricted in out of centre locations</li> </ul>				
Other: <ul style="list-style-type: none"> <li>• Need policy for trade parks</li> <li>• Parking should be expanded and made cheaper</li> <li>• East Wittering has experienced decline in retail facilities despite growth in housing</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
This policy addresses the retail hierarchy and sequential approach. Further detail on retail				

policy is set out in proposed Development Management policies DM11 and DM12. Many of the comments raised in response to this policy concern national trends or current concerns in retail. The plan proposed a short term strategy given the changing nature of the high street.

Overall it is considered that the hierarchy is an appropriate response to national planning policy, but further thought will be given to proposed amendments.

Further consideration will be given to the findings of the Retail Needs study, and in particular the identification of 9,500 sq m of additional comparison retail floorspace to 2026.

<b>Policy S10 Local Centres, Local and Village Parades</b>				
Respondents	Representations	Support	Object	Comment
Policy: 9	9	2	4	3
Representation numbers				
2995, 2591 (Turley obo Countryside Properties), 2636 (Barton Willmore), 538, 1173 (Genesis Town Planning obo Rawleigh Property Management), 1460, 2858, 3262 (Westbourne Parish Council), 670				
Summary of issues and key comments raised by residents and other respondents				
Support in principle ( <b>Westbourne Parish Council</b> )				
Object: <ul style="list-style-type: none"> <li>• Nowhere to accommodate retail provision other than green fields</li> </ul>				
Wording: <ul style="list-style-type: none"> <li>• Suggest changes to policy wording (<b>Turley obo Countryside Properties</b>)</li> <li>• Interchangeable use of terminology is confusing (<b>Genesis Town Planning obo Rawleigh Property Management</b>)</li> <li>• Policy wording is not clear about role of local parades</li> </ul>				
Strategic development: <ul style="list-style-type: none"> <li>• Should be provision for strategic development where greater retail provision can be supported without impacting upon main centre (<b>Barton Willmore</b>)</li> </ul>				
Retail offering: <ul style="list-style-type: none"> <li>• Variety of services/shops should be encouraged and incentivised</li> </ul>				
Other: <ul style="list-style-type: none"> <li>• Use notices, signs and posters to communicate community activities</li> <li>• Policy does not enhance East Wittering centre</li> <li>• Policies S9 and S10 do not correlate (<b>Barton Willmore</b>)</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
Some comments received in response to this policy concern national trends or non-planning considerations. However, a number of comments have highlight detailed points where the policy could be improved for clarity. The points raised will be considered further and the policy amended as appropriate.				

<b>Policy S11 Addressing Horticultural Needs</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 4	4	0	1	3
Policy: 13	13	4	3	6
Representation numbers				
85, 321, 349, 351, 600, 671, 1249 and 1250 (North Mundham PC), 1723 (Harbour Villages Lib Dems Campaign Team), 2524 (Sidlesham PC), 2724 (Sussex Wildlife Trust), 2861, 2894, 2938 (CPRE Sussex), 2996, 3378 (Landlink Estates Ltd), 3523 (Portsmouth Water)				
Summary of issues and key comments raised by residents and other respondents				
Will need to review in the light of BREXIT ( <b>CPRE Sussex</b> )				
Horticulture wider than glasshouses: <ul style="list-style-type: none"> <li>Community projects can use grass verges/redundant land (community orchards, vegetable growing etc.)</li> <li>Combine green/environment/food related activities with small scale food growing for future</li> <li>Amend policy to “Addressing Food Cluster Needs”; make reference to “other related facilities” (<b>Landlink Estates Ltd</b>)</li> </ul>				
Investment and development in industry: <ul style="list-style-type: none"> <li>Scope for innovative horticulture to be encouraged in Sidlesham and Almodington (<b>Harbour Villages Lib Dems Campaign Team</b>)</li> <li>Refer to “food cluster” industry and including related facilities (<b>Landlink Estates Ltd</b>)</li> </ul>				
Impact on landscape: <ul style="list-style-type: none"> <li>Loss of valuable high-grade land in Runcton HDA as a result of permissions other than for glasshouses/polytunnels (<b>North Mundham PC</b>)</li> </ul>				
Reduction in areas north of HDA: <ul style="list-style-type: none"> <li>Need explanation of reasoning; reductions should be replaced. (<b>North Mundham PC</b>), (<b>Landlink Estates Ltd</b>)</li> </ul>				
Runcton HDA expansion: <ul style="list-style-type: none"> <li>Runcton is in prime position and surrounding areas are inferred in the Landscape Capacity Study as ideal for development (<b>Landlink Estates Ltd</b>)</li> <li>current reported horticulture committed supply does not include ancillary horticultural developments - these would bring the committed supply above max requirement reported by G L Hearn – figures are out of date as there are many permissions since G L Hearn which evidence accelerated growth - even more HDA land is therefore required (<b>Landlink Estates Ltd</b>)</li> </ul>				
Tangmere HDA potential: <ul style="list-style-type: none"> <li>Not possible to build glasshouses within HDA with new housing due to light pollution</li> <li>Map of Tangmere HDA should be provided with latest glasshouse proposal shown in south west</li> <li>Questions whether access road to new glasshouse site at south west part of HDA has been set back to south of the ‘apron’?</li> </ul>				
Tangmere HDA boundary: <ul style="list-style-type: none"> <li>Concern whether Business Park and ‘apron’ site are excluded</li> </ul>				
Light pollution:				

<ul style="list-style-type: none"> <li>Require investigation of potential impact from horticultural development (<b>CPRE Sussex</b>)</li> </ul>
<p>Scale of industry outside HDAs</p> <ul style="list-style-type: none"> <li>Concern over scale of industry outside HDAs and other land uses within small HDAs (<b>Sidlesham PC</b>)</li> <li>Suggest refusing to allow conversion of HDA land within smaller HDAs and include Fletchers Estate, Jakes Nursery and Street End Lane as HDAs (<b>Sidlesham PC</b>)</li> </ul>
<p>Impacts on water:</p> <ul style="list-style-type: none"> <li>Horticultural businesses may now need abstraction licences if have relied on rainwater harvesting and storage (<b>Portsmouth Water</b>)</li> <li>Clarify how horticultural industry will support commitments to water efficiency (<b>Sussex Wildlife Trust</b>)</li> </ul>
<p>Conflicts with tourism and quiet recreation:</p> <ul style="list-style-type: none"> <li>Horticultural development should respect Dark Skies policy of adjoining SDNP</li> </ul>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p>
<p>Some comments have questioned the level of overall need for horticultural floorspace. The Housing and Economic Development Needs Assessment is being reviewed to consider the matter further. This will inform further consideration of comments made regarding the size and boundaries of Horticultural Development Areas and any delivery issues experienced. Further consideration will be given as to whether additional guidance should be included concerning the appropriate uses within the proposed areas.</p> <p>Comments received on water requirements are noted, experience of recent horticultural development proposals has not highlighted a water supply issue with the deliverability of additional horticultural development.</p> <p>Comments regarding light pollution are noted and will be considered alongside the comments received on draft policy DM23 to assess if any further amendments are necessary.</p>

<b>Policy S12: Infrastructure Provision</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 15	17	2	7	8
Policy: 57	57	15	24	18
Representation numbers				
2895; 2592 (Turley on behalf of Countryside Properties); 1976; 1724 (Harbour Villages Lib Dem Campaign Team); 1671 (Chichester BID); 1649; 1589; 1588; 1399; 408; 1386; 1251 (North Mundham PC); 1122; 942; 952; 114; 679; 3414 (Seaward Properties Ltd); 3184 3321 (Domusea); 3292; 3274 (Landacre Developments Ltd); 3245 (WSCC Estates) 3240 (Taylor Wimpey Strategic Land); 3054 Henry Adams obo The Green Family site promoters); 2997 (Portsmouth Water); 2939 (CPRE); 2889 (Bloor Homes); 2867; 2738 (Boxgrove PC); 2725 (Sussex Wildlife Trust); 2654; 2637 (Barton Willmore); 2593 (Countryside Properties); 2544 (Chichester Harbour Trust); 2539; 2521 (Sidlesham PC) 2379; 2997 (Portsmouth Water); 2194 (Environment Agency); 2105 (WSCC); 2013; 1965; 1962; 1944; 1881; 1679; 1648; 1635; 1480; 1454 (Donnington PC); 1450; 1341; 1308; 1277 (HMPC Ltd); 1252 (North Mundham PC); 1160 (Thames Water Utilities); 1156; 1010; 993 (Birdham PC); 981; 955; 938; 683; 635; 584; 483; 433; 365; 322; 287; 239 (Sustrans); 198; 115; 109; 88.				
Summary of issues and key comments raised by residents and other respondents				
Support Policy: <b>(WSCC Estates; Taylor Wimpey Strategic Land; Sussex Wildlife Trust; Barton Willmore; Sidlesham PC; Environment Agency; WSCC; Bosham Football Club; HMPC Ltd; Thames Water Utilities Ltd; Birdham PC; Countryside Properties; Chichester BID)</b>				
Impact on the A27: <ul style="list-style-type: none"> <li>• Highways England should provide the funding</li> <li>• Proposed mitigation will not improve A27</li> <li>• Proposed mitigation will penalise the Manhood Peninsula by restricting access to the main road and to and from the City.</li> <li>• There should be no further new housing until the A27 is improved</li> <li>• The plan should support a northern bypass</li> <li>• Local people should not be forced to take longer routes because of the proposed mitigation.</li> </ul>				
Impact on education: <ul style="list-style-type: none"> <li>• Object that no new schools are planned on Manhood Peninsula – it is unsustainable for places to be provided outside the area (<b>Donnington PC</b>)</li> <li>• Schools need to be built with new developments – no provision for education has been met on previous large sites</li> <li>• Existing schools are short on funding</li> <li>• Most schools are already at capacity</li> </ul>				
Impact on Waste water: <ul style="list-style-type: none"> <li>• A new Regional sewerage solution is needed to replace the unsustainable use of Aldingbourne Rife for sewage disposal. With large housing allocations to the north of Chichester Harbour it will not be possible to discharge effluent from Thornham WWTW and Bosham WWTW in future. Tighter standards for Nitrates and Phosphates will make these works redundant and the only sustainable solution is to treat all the flows at Apuldram and discharge at Bracklesham. A regional solution will allow future effluent re-use if this becomes desirable.</li> <li>• No reference to sewerage networks – leaving this to the planning application stage does not work (<b>Environment Agency</b>)</li> <li>• Untreated sewerage is ending up in the sea because the existing sewers cannot cope posing a risk to public health/health of SSSI. Increase capacity at all water treatment works (<b>Chichester Harbour Trust</b>)</li> </ul>				

<p>Impact on Flood Risk:</p> <ul style="list-style-type: none"> <li>No reference to flood risk infrastructure</li> </ul>
<p>Impact on emergency services:</p> <ul style="list-style-type: none"> <li>Insufficient policing, fire and ambulance services</li> </ul>
<p>Impact on Infrastructure</p> <ul style="list-style-type: none"> <li>The timing of the provision of infrastructure is too late, it needs to go in earlier/first. <b>(CPRE)(Boxgrove PC)</b></li> <li>No new development until the infrastructure is in place.</li> <li>Undertakers and Local Planning Authorities must be engaged as early as possible and requirements for the funding of infrastructure must be much tougher and more stringent <b>(Portsmouth Water)</b></li> <li>Need more housing in order to ensure delivery of infrastructure <b>(Taylor Wimpey)</b></li> <li>Infrastructure must be part funded by Council, where it is of wider benefit than just to make a development acceptable <b>(Barton Willmore)</b></li> <li>Make better use of existing infrastructure first including opportunities for co-location and multi-functional use of facilities</li> <li>Supports policy but doubts that S106, CIL and other funding will be sufficient to pay for all infrastructure needs <b>(Sidlesham PC)</b></li> <li>Supports policy but concerned about levels of new development because current infrastructure is inadequate.</li> <li>Developer contributions need to be tested for viability <b>(Turley)(Bloor Homes)</b></li> <li>Infrastructure costs must be subject to viability <b>(WSCC Estates)</b></li> <li>Current proportions of housing/employment figures could restrict delivery of infrastructure <b>(WSCC Estates)</b></li> <li>Balance between market housing and affordable housing and necessary infrastructure is difficult to justify particularly in Service Villages <b>(North Mundham PC)</b></li> <li>IDP needs to be much more detailed particularly for the first five years <b>(Seaward Properties)(Landacre Developments Ltd)</b></li> </ul>
<p>Modal switch:</p> <ul style="list-style-type: none"> <li>The policy should refer to sustainable forms of transport such as cycling</li> <li>Trains only stop at small stations once an hour</li> <li>Insufficient bus service out of peak hours and too expensive</li> <li>This policy and policy S13 should aim to encourage cycling and walking access to be the natural and preferred modes of access.</li> </ul>
<p>Impact on health facilities:</p> <ul style="list-style-type: none"> <li>Manhood has issues with getting appointments at the medical centre</li> <li>Specific provision should be made for additional doctors and other medical services on the Manhood Peninsula.</li> </ul>
<p>Broadband:</p> <ul style="list-style-type: none"> <li>Support the reference to development funding full fibre communications infrastructure <b>(WSCC)</b></li> <li>Object to reference to development funding full fibre communications infrastructure <b>(Bloor Homes)</b></li> <li>High Speed Broadband should be a priority for all areas of Chichester.</li> </ul>
<p>Electric vehicle Infrastructure</p> <ul style="list-style-type: none"> <li>Consider adding EV charging facilities as a key infrastructure requirement for developments.</li> </ul>
<p>Impact on Local Economy</p> <ul style="list-style-type: none"> <li>Marine Industry must be retained and encouraged <b>(Harbour Villages Lib Dem Campaign Team)</b></li> </ul>

- City Centre should be planned to accommodate a mix of uses to maintain its vitality  
**(Chichester BID)**

#### Impact on climate change

- Infrastructure should distinguish high carbon/low carbon, and which infrastructure has and does not have an impact on landscape and or historic environment, particularly car infrastructure. Must insist on low car developments, so that costly road infrastructure won't need to be funded.
- Green infrastructure must include blue infrastructure **(Sussex Wildlife Trust)**

#### Initial Council response to issues raised and way forward for the Local Plan Review

The purpose of the policy is to set out how the council will address the provision of infrastructure to support the development proposed in the plan. A number of responses to the policy request amendments to highlight factors such as the timing of infrastructure, the role of developer contributions and viability testing. These will be considered further as the Plan progresses to see if improvements can be made to improve clarity and outcomes.

The majority of comments concerned issues with a range of infrastructure. The current understanding of infrastructure requirements is set out in the Infrastructure Delivery Plan (IDP) published in support of the Local Plan. The IDP will be revised as a result of new and emerging evidence, and further engagement with infrastructure providers. However, some initial comments on the points raised in the representations follow -

Impact on the A27: Further transport work is being undertaken and the Local Plan/IDP will be updated if required according to its findings. The original Peter Brett Study simply tested whether the level/location of development could be capable of mitigation. However, it is acknowledged that this won't address all of the underlying A27 issues.

Impact on education: WSCC is responsible for School Place planning and has advised the Local Plan Review as to its requirements, which are set out in the IDP. These requirements will be kept under constant review as the plan progresses and the child product of each development is known. WSCC provides updates to CDC bi-annually.

Impact on Waste water: The policy will be amended to include reference to Waste Water Treatment Works in the list in the first paragraph. Liaison with Southern Water and Thames water was undertaken in the production of the LPR, and their findings as to what is needed is within the IDP, their needs are reviewed bi-annually. We are continuing to work with Southern Water to establish needs and are also working with Natural England and other partners on a nutrient neutral policy and management plan.

Impact on Flood Risk: The first paragraph of the policy will be amended to include the words 'flood prevention' after 'environmental'. In addition, this issue is also covered by policies S20, point 13; S25; and S27.

Impact on emergency services: Liaison with the Police, Fire and Ambulance services was undertaken in the production of the local plan, and their findings as to what is needed is within the IDP, and this is reviewed bi-annually.

Impact on Infrastructure: The IDP provides as much detail as is known at this stage - the detail is refined through either the IBP or through the S106 once more information is known at the planning application stage.

The Viability Assessment will inform the decision to be taken about the balance to be taken between the level of affordable housing and infrastructure. A decision will then be taken by the Council as to whether to make policy changes in response to this evidence.

Only enabling infrastructure has to be provided in advance of development, the remainder is phased in accordance with the build out of the development for viability reasons and the triggers for this are set out in S106 agreements.

Modal switch: Cycling as a sustainable transport form is covered in Policy S23

Impact on health facilities: Liaison with the NHS was undertaken in the production of the local plan, and their findings as to what is needed is within the IDP, and this reviewed bi-annually.

Broadband: This policy supports high speed broadband by ensuring that this is provided or funded as part of development proposals.

Role of West Sussex County Council: Paragraph 4.81 should be amended to better reflect the role of the County council in planning and securing essential infrastructure in strategic development

Electric vehicle Infrastructure: Provision for electric vehicle charging points is included in Policy 23. The bullet point will add the word 'vehicle' between 'electric' and 'charging'.

Impact on Local Economy: These points are addressed elsewhere within the plan and the comments seem to be more related to employment and retail rather than infrastructure.

Impact on climate change: Policy S23 addresses most of the issues raised.

<b>East/West Corridor</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 5	5	0	3	2
Representation numbers				
2467 (Southbourne PC), 2777, 3480, 3539, 3546 (Harbour Villages Lib Dems Campaign Team)				
Summary of issues and key comments raised by residents and other respondents				
Decision to develop east west corridor is short sighted: ( <b>Harbour Villages Lib Dems Campaign Team</b> )				
<ul style="list-style-type: none"> <li>• damaging to area</li> <li>• will not enhance villages</li> <li>• adverse impact on wildlife</li> <li>• increased use of shoreline footpaths.</li> <li>• Infrastructure not present.</li> <li>• Will develop land too close to AONB and create housing corridor</li> <li>• Green links from Chichester Harbour to South Downs.</li> </ul>				
Chichester Vision unsuitable to be incorporated in Plan.				
New retail and offices should be "new" only in the sense of replacing vacating retailers and offices				
Consider as whole instead of settlements along transport route. Would benefit from collective attention e.g. wastewater, traffic, landscape, wildlife, coalescence. Pressures of development exacerbated by AONB/NP and new development in adjacent county ( <b>Southbourne PC</b> )				
Initial Council response to issues raised and way forward for the Local Plan Review				
The points raised in these representations are noted. The cumulative sustainability impact of the east/west corridor strategy is set out in the Sustainability Appraisal. Other options to the east/west corridor strategy are being explored by further sustainability appraisal work which will inform the next stage of the plan.				

<b>Policy S13 Chichester City Development Principles</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 1	1	0	1	0
Policy: 25	27	15	3	9
Representation numbers				
3246 (Henry Adams LLP obo WSCC Estates), 3140, 2998, 2940 (CPRE Sussex), 2872, 2726 (Sussex Wildlife Trust), 2380, 2292 (Historic England), 2106 (WSCC), 2031, 1840, 1730 (Harbour Villages Lib Dems Campaign Team), 1674, 1575, 1498, 1481 (The Theatres Trust), 1405, 1278 (HMPC Ltd), 1271(HMPC Ltd), 972 (Chichester Conservation Area Advisory Committee), 726 (St Pancras Church), 717 (West Itchenor Parish Council), 605, 216 (Chichester City Council), 125 (Chichester Society), 90				
Summary of issues and key comments raised by residents and other respondents				
Support: 216 ( <b>Chichester City Council</b> ), 125 ( <b>Chichester Society</b> )				
<ul style="list-style-type: none"> <li>• Support approach. Policy site SA6 can deliver objectives (<b>Henry Adams LLP obo WSCC Estates</b>).</li> <li>• Policy S13 should also apply to the need for affordable housing within city's urban area</li> <li>• Support requirement to protect views of Cathedral. 2940 (<b>CPRE Sussex</b>)</li> <li>• Support provision of enhanced green infrastructure network and approach that will ensure opportunities to deliver natural capital and measureable net gains in biodiversity are planned for at an early stage. 2726 (<b>Sussex Wildlife Trust</b>)</li> <li>• Support paragraph 4.91. Reference should be made to heritage impact assessments to underpin planning of new development. 2292 (<b>Historic England</b>)</li> <li>• Support aims to encourage walking and cycling. 2106 (<b>WSCC</b>)</li> <li>• Paragraph 4.88 needs to make more explicit that setting of the city and relationship with SDNP to be protected and not all land is available/suitable for development within corridor. 1278, 1271 (<b>HMPC Ltd</b>)</li> <li>• Increase housing numbers in city and increase social housing.</li> </ul>				
Object:				
<ul style="list-style-type: none"> <li>• Issues need to be more fully teased apart to better protect local character which in turn enhances economic development.</li> <li>• Additional recognition required for those accessing the East-West corridor by foot and bikes.</li> <li>• Need requirement for public art</li> <li>• Reference to be made to city centre being Conservation Area and details appended to policy. 972 (<b>Chichester Conservation Area Advisory Committee</b>)</li> </ul>				
City Centre redevelopment				
<ul style="list-style-type: none"> <li>• Area (Southern Gateway) must be fully redeveloped with hotel, multiuse centre, community facilities, university, housing for young people. 1730 (<b>Harbour Villages Lib Dems Campaign Team</b>)</li> </ul>				
Policy wording:				
<ul style="list-style-type: none"> <li>• Third bullet point is repeat of second. Delete third bullet point.</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
The broad support for this policy indicates there is some consensus on the development principles for Chichester City. The policy could benefit from some rewording to be more explicit on key elements, remove repetition and improve clarity. This will be updated in the next iteration of the Plan.				

<b>East of Chichester</b>				
Respondents	Representations	Support	Object	Comment
Supporting text: 1	1	0	1	0
Representation numbers				
3330 (Nexus Planning Ltd)				
Summary of issues and key comments raised by residents and other respondents				
Presentation of LPR document is unclear as para 4.103 refers to strategic allocations already allocated in adopted LP ( <b>Nexus Planning Ltd</b> )				
Initial Council response to issues raised and way forward for the Local Plan Review				
Comments are noted. The text is to provide context for the position of development in that area to date.				

<b>Policy S14 Chichester City Transport Strategy</b>				
Respondents	Representations	Support	Object	Comment
Policy: 44	49	10	25	14
<p>Representation numbers</p> <p>121, 126 (Chichester Society), 217 ( Chichester City Council) , 240 (Sustrans), 263, 434, 468, 469, 471, 514, 585, 586, 718 ( West Itchenor PC) , 755, 855, 896, 875, 898, 900, 904, 1085, 1111, 1220, 1355, 1564, 1582, 1618, 1676 (Chichester BID), 1682, 1731 ( Harbour Villages Lib Dem Campaign) 1827, 1841, 2033, 2199, 2381, 2443 (SDNPA), 2727 (Sussex Wildlife Trust), 2874, 2896,2941 (CPRE), 2999, 3479</p> <p>Representations recorded here but relating to the A27 or to the Transport Study: 92, 1124, 1408, 1548, 1561, 1656, 1675</p>				
<b>Summary of issues and key comments raised by residents and other respondents</b>				
<p>Support</p> <ul style="list-style-type: none"> <li>• General support (<b>Chichester BID</b>)</li> <li>• More specific support for elements of the policy – including bus lanes, priority measures</li> <li>• Cycling measures (<b>Sustrans</b>)</li> </ul>				
<p>Prioritise sustainable modes of travel – various measures suggested to strengthen the approach including ( many of these are already in the policy)</p> <ul style="list-style-type: none"> <li>• Reduce the need to travel</li> <li>• Reallocate road space</li> <li>• Develop local cycling and walking infrastructure programme</li> <li>• Provide park and ride ( <b>West Itchenor PC, Chichester Society</b>)</li> <li>• Encourage use of peripheral car parks</li> <li>• Review car parking provision, charges and payment method</li> <li>• Parking restrictions to improve traffic flow – to help buses</li> <li>• Ensure that existing routes such as Centurion Way are protected and improved (<b>CPRE</b>)</li> <li>• Use s106 and CIL to deliver integrated transport strategy</li> <li>• Links to South Downs National Park should be mentioned in penultimate bullet re cycle connections (<b>SDNPA</b>)</li> <li>• Safeguard land to expand rail station ( <b>W Itchenor PC, Chichester Society</b>)</li> <li>• Importance of pedestrian and cycle links between settlements (e.g. Donnington village to Stockbridge) and linking city centre to existing cycle routes.</li> <li>• Extend pedestrian area into Little London and Baffins Lane Car Parks</li> </ul>				
<p>Other:</p> <ul style="list-style-type: none"> <li>• This policy needs to be based on evidence – Chichester Vision Transport Feasibility Study is yet to be published – need to reconsult on proposals after that.</li> <li>• Use of peripheral car parks unsuitable for shoppers</li> <li>• Bus lane at Bognor roundabout will cause queues.</li> <li>• Need to resolve level crossing issue - underpass suggested ( <b>West Itchenor PC, Chichester Society</b>).</li> <li>• Links to air quality.</li> <li>• Concerned about any reduction in town centre parking provision (<b>Chichester City Council</b>).</li> </ul>				
<p>Comments relating to broader transport issues</p> <ul style="list-style-type: none"> <li>• Need a proper solution to the A27 – not tinkering with junctions</li> <li>• Need a proper bypass</li> <li>• Welcome at grade improvements for A27</li> </ul>				

- Do not accept costings in Transport Study ( **Harbour Villages Lib Dem Campaign Team**)
- Create peripheral relief roads b/w A27 and A286 to East and West.

Initial Council response to issues raised and way forward for the Local Plan Review

Many of the comments here relate to the ongoing transport assessment work being prepared in support of the Local Plan, and in particular the strategic issue with the A27. The finding from that work will be incorporated in the next iteration of this policy.

The emphasis on sustainable travel is noted and it is considered the actions in the policy demonstrate that sustainable travel is a priority – though perhaps an introductory statement could make this clearer.

Much of the details sought in representations is likely to come forward in two complimentary studies. *Chichester Vision – Transport Feasibility Study* and *Sustainable Transport Package Feasibility for Chichester Study* are being progressed with guidance from West Sussex County Council as Highway Authority, and the findings from that work will be reflected in this policy in the next iteration of the Plan.

<b>Policy S15 Goodwood Motor Circuit and Airfield</b>				
Respondents	Representations	Support	Object	Comment
Policy: 21	22	5	13	4
Representation numbers				
91, 276, 366, 409, 484, 526, 688, 712, 1028, 1039, 1221, 1253 (North Mundham PC), 1281 (Goodwood Estates), 1338, 1572, 1733 (Harbour Villages Lib Dem Campaign), 2248 (Historic England), 2382, 2875,3000, 3461, 3522				
Summary of issues and key comments raised by residents and other respondents				
Support				
<ul style="list-style-type: none"> <li>• Support requirements in relation to heritage (<b>Historic England</b>)</li> <li>• General support (<b>Goodwood Estates</b>)</li> </ul>				
Support but				
<ul style="list-style-type: none"> <li>• Goodwood Estates will be preparing a “Whole Estate Plan” straddling area of this plan and SDNP (as required in SDNP Plan) – this should be acknowledged and need to ensure policies are consistent.</li> <li>• Object to noise buffer – areas along A27 don’t have one</li> </ul>				
Buffer zone should be used for industrial/commercial development (note more reps suggesting this made under S8 Meeting Employment Land Needs)				
<ul style="list-style-type: none"> <li>• Including some/all of that proposed for AL6 (<b>Harbour Villages Lib Dem Campaign</b>)</li> <li>• Noise shouldn’t be an issue for industry</li> <li>• Include a new link road for access to A27 East and West of city</li> </ul>				
Need A27 scheme to separate local and through traffic to avoid gridlock caused by Goodwood events.				
Additional wording suggestions:				
<ul style="list-style-type: none"> <li>• Refer to noise and traffic chaos</li> <li>• Ensure greater spill off benefits to wider business community</li> <li>• Need to ensure any development doesn’t encroach on area of interest for future strategic road scheme.</li> <li>• Refer to light pollution visible from SDNP Dark Skies area</li> </ul>				
Other:				
<ul style="list-style-type: none"> <li>• Experience suggests policy requirement for additional traffic to be mitigated by opportunities for non car travel won’t work (<b>North Mundham PC</b>)</li> <li>• Policy should require additional development here to contribute to highway improvements</li> <li>• Consider protection of Goodwood has prevented a Northern bypass route coming forward</li> <li>• Dispute the economic and cultural benefits as folklore</li> <li>• Unclear why a separate policy is needed rather than generic policies applying</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
<p>The forthcoming Whole Estate Plan for Goodwood is noted and if available could inform the next iteration of the Plan.</p> <p>Comments regarding the future use of the buffer area for employment development are noted and will be considered further in light of the ongoing work on employment needs and the deliverability of other sites.</p> <p>Issues regarding the A27 are noted, but it is not considered appropriate for this policy to require new links unless justified by future work.</p>				

<b>Policy S16 Development within vicinity of Goodwood Motor Circuit and Airfield</b>				
Respondents	Representations	Support	Object	Comment
Policy: 28	29	4	16	9
Representation numbers:  93, 224, 315, 367, 485, 502, 690, 1027, 1038, 1168, 1254 (North Mundham PC), 1282 (Goodwood Estates), 1337, 1356, 1550, 1624, 1651, 1665, 1684, 1687, 1736 ( Harbour Villages Lib Dem Team) 1995 (March C of E School) , 2030 (Summersdale Residents Assoc),2187, 2383, 2876, 2898, 3462, 3481				
<b>Summary of issues and key comments raised by residents and other respondents</b>				
Support <ul style="list-style-type: none"> <li>• keeping the buffer (Summersdale Residents Assoc) and supporting the motor circuit.</li> <li>• With minor changes (<b>Goodwood Estates</b>)</li> </ul>				
Area should be used for employment ( similar comments also made against S15, S8 and AL6) <ul style="list-style-type: none"> <li>• Use buffer zone for employment, including from AL6 (<b>Harbour Villages Lib Dem Campaign</b>)</li> <li>• Use for commercial development that isn't noise sensitive (<b>North Mundham PC</b>)</li> <li>• Industrial scheme would be compatible with a northern relief road through the buffer</li> </ul>				
Other uses: <ul style="list-style-type: none"> <li>• Primary schools should be removed from the definition of noise sensitive (<b>March C of E Primary School</b>)</li> <li>• This could form part of a larger housing allocation with most of the buffer kept as open space – incursion into buffer to be justified with technical work. (comment relates to HELAA site HWH0009)</li> </ul>				
Unclear why a buffer is needed here when noise is intermittent but not along A27 where it is constant. <ul style="list-style-type: none"> <li>• Presumption against development here should only relate to residential uses.</li> </ul>				
Recognise area as one of few quiet green routes from Chichester to the downs – any development should be sympathetic to rural character and enhance views from paths.				
Development at Goodwood should be linked to providing land and funding for a northern bypass				
<b>Initial Council response to issues raised and way forward for the Local Plan Review</b>				
Comments regarding the future use of the buffer area for employment development are noted and will be considered further in light of the ongoing work on employment needs and the deliverability of other sites. The policy seeks to limit noise-sensitive uses within the buffer. Comments regarding specific uses are noted, but on balance the policy is considered to provide the right approach. A buffer is still considered the appropriate approach, given the potential for nearby development to come into conflict with the activities at Goodwood.				

<b>West of Chichester</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 7	7	1	5	1
Representation numbers				
116, 410, 829 (Fishbourne PC), 1591, 2840 (Gleeson Strategic Land), 2877, 3482				
Summary of issues and key comments raised by residents and other respondents				
Support growth towards east/west corridor. <b>(Gleeson Strategic Land)</b>				
None of service villages are suitable for development due to poor accessibility; need new junction on A27 at Southbourne.				
Development will damage character of rural settlements.				
Weak plan. Need low car housing, home working, small scale shopping and school on site.				
Para 4.112 - Add "while maintaining separation of the Service Villages."				
Para 4.113 - cumulative impact on infrastructure of individual proposals is underplayed. Total of 2,300 homes; Fishbourne and roundabout will be affected not by traffic from 250 homes but by that from 2,300 homes. <b>(Fishbourne PC)</b>				
Para 4.115 – reasons for no development could be applied anywhere. Area (north of A27) should be considered for some development.				
Implies northern part of city is excluded as near to SDNPA. Better to build here rather than floodplain, where economically and environmentally more viable.				
Para 4.118 - When will the existing military use of Thorney Island next be reviewed?				
Initial Council response to issues raised and way forward for the Local Plan Review				
Comments regarding the west of Chichester are noted. It is recognised that the Plan must consider the cumulative impacts of all development and clearly articulate aims, including the separation of settlements. The availability of land elsewhere will be considered further following a review of the Housing and Economic Land Availability Assessment and ongoing Sustainability Appraisal work.				

<b>Policy S17: Thorney Island</b>				
Respondents	Representations	Support	Object	Comment
Policy: 10	10	2	3	4
Representation numbers				
3067 (Chichester Harbour Conservancy), 3001, 2879, 2545 (Chichester Harbour Trust), 2879, 2460 (Southbourne Parish Council), 2249 (Historic England), 2195 (Environment Agency), 2005 (RSPB), 1592, 691				
Summary of issues and key comments raised by residents and other respondents				
Support:				
<ul style="list-style-type: none"> <li>Continued use of Thorney Island by MOD as good environmental custodians (2545 <b>Chichester Harbour Trust</b>),</li> <li>Support positive strategy for conservation and enjoyment of historic environment but would prefer 'significant archaeological assets' to remain in situ. 2249 (<b>Historic England</b>)</li> </ul>				
Object:				
<ul style="list-style-type: none"> <li>Wording 'have regard' is open to interpretation and requires strengthening to protect AONB. 3067 (<b>Chichester Harbour Conservancy</b>)</li> <li>Should Thorney Island cease to be required for military purposes, should receive at least equal protection to other areas within AONB, including presumption against new development and Chichester Harbour Conservancy's Planning Principles policy. Infrastructure needs to be addressed should military leave. 2460 (<b>Southbourne Parish Council</b>)</li> <li>No mention of the Core and Supporting Areas on Thorney Island which are within the SWBGS. 2005 (<b>RSPB</b>)</li> </ul>				
Policy wording:				
<ul style="list-style-type: none"> <li>Support positive strategy for conservation and enjoyment of historic environment but would prefer 'significant archaeological assets' to be retained in situ. 2249 (<b>Historic England</b>)</li> <li>Consider further wording to provide specific support for habitat creation. 2195 (<b>Environment Agency</b>)</li> <li>Define 'noisy sports'</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
<p>Comments regarding detailed wording are noted. It is noted the draft policy states particular regard should be given to environmental sensitivity of this area. The policy also makes it clear that should this area cease to be required for military purposes, then those considerations still apply.</p> <p>Further suggestions for detailed policy wording amendments will be considered further as the Plan progresses.</p>				

<b>Manhood Peninsula</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 5	5	0	4	1
Representation numbers				
288, 360, 905, 2373, 2899				
Summary of issues and key comments raised by residents and other respondents				
<p>Acknowledging poor accessibility and congestion caused by the A27 on the Manhood peninsula, no reference to chaos caused during the increasing number of events at Goodwood, and peninsula being virtually cut off for several individual days.</p> <p>More houses on peninsula will mean there is need to look at combined effect of multiple sites.</p>				
Housing should be carbon neutral				
Green tourism is important and will be seriously affected.				
Development is too near AONB, SPA, SSSI. Will be an impact on ecology and insufficient mitigation.				
Initial Council response to issues raised and way forward for the Local Plan Review				
<p>In general it is considered the supporting text offers a reasonable description of the relevant issues for the Manhood Peninsula. The proximity to sensitive environmental assets is acknowledged. The cumulative impact of the development envisaged in the Plan is considered in the emerging evidence base, including the Transport Study and Infrastructure Delivery Plan.</p>				

<b>Policy S18: Integrated Coastal Zone Management for the Manhood Peninsula</b>				
Respondents	Representations	Support	Object	Comment
Policy: 32	35	8	13	14
Representation numbers				
3459, 3130, 3068 (Chichester Harbour Conservancy), 2880, 2348 (West Sussex Local Access Forum), 2196 (Environment Agency), 2103 (WSCC), 1593, 1587, 1580, 1456 (Donnington Parish Council), 1389, 1387, 1357, 1335, 1256 (North Mundham Parish Council), 1255 (North Mundham Parish Council), 1223, 1219, 1130 (British Horse Society), 1127 (Chichester and District Cycle Forum), 991,792, 739, 693, 634, 559, 503, 475, 435, 368, 241, 191, 94, 84 (Marine Management Organisation)				
Summary of issues and key comments raised by residents and other respondents				
Support: <ul style="list-style-type: none"> <li>Objective 5 – support and should apply to all Non-Motorised User (NMU) activity through provision of at least one multi user route and through developments linked to existing PROW and wider access networks. 2348 (<b>West Sussex Local Access Forum</b>)</li> <li>Support specific references to key plans and intention that financial contributions sought to deliver both flood risk management infrastructure and improvements to quality of watercourse in area. 2196 (<b>Environment Agency</b>)</li> <li>Support objective 5. Ensure at least one multi use route is provided through or around development which can also serve as green corridor. Routes can form basis of NMU network and link with PROW. 1130 (<b>British Horse Society</b>)</li> <li>Support need to improve infrastructure to support sustainable modes of transport. 1127 (<b>Chichester and District Cycle Forum</b>)</li> </ul>				
Impact on ecology: <ul style="list-style-type: none"> <li>Plans as proposed would have unacceptable impact on ecology, AONB, SPAs, SSSI and Ramsar site. 1456 (<b>Donnington Parish Council</b>)</li> <li>.</li> </ul>				
Object: <ul style="list-style-type: none"> <li>Proposals would have negative impact on green tourism which is an important part of local economy. 1456 (<b>Donnington Parish Council</b>)</li> <li>Infrastructure unable to cope with large scale development, including removal of foul drainage. 1256 (<b>North Mundham Parish Council</b>)</li> <li>Policy should define and describe area covered by Manhood Peninsula acknowledging it commences immediately to south of and abutting A27 and includes whole parish of Appuldram, Donnington and Hunston.</li> <li>AL6 proposed link road contrary to CDCs ICZM policy.</li> <li>No specific mention of Chichester Harbour Conservancy</li> </ul>				
Policy wording: <ul style="list-style-type: none"> <li>Strengthen policy wording to support plan area becoming carbon neutral by 2030</li> <li>Strengthen policy wording to ensure enhanced safe cycle routes, bus connections are provided and more than just ambitions.</li> <li>Reword opening para of S18 to: "The Council will prepare plans, strategies, projects and other measures, in partnership with Chichester Harbour Conservancy and other organisations and local communities, to ensure that the Manhood Peninsula is planned for in a coordinated and integrated manner, whilst recognising the individual needs of the communities within the area." 3068 (<b>Chichester Harbour Conservancy</b>)</li> <li>Include reference to canal footpath and National Coastal Footpath in bullet point 5.</li> </ul>				

- Additional bullet to preserve the dark night skies of the Manhood and character of the peninsula as well as reducing power consumption.
- Reference should be made to document 'Towards Integrated Coastal Zone Management (ICZM) on the Manhood Peninsula' as supporting document.
- Reference should be made to South Marine Plan. 84 (**Marine Management Organisation**)

Climate Change/flood risk:

- Manhood Peninsula unsuitable for development as majority under 5m above sea level, subject to poor drainage

Initial Council response to issues raised and way forward for the Local Plan Review

The comments regarding the policy wording, and suggestions for additions or amendments are noted. It is considered that the policy would benefit from amending to pick up a number of the points raised and these will be reflected in the next iteration of the Plan.

A number of objections concern the development envisaged in the peninsula rather than the policy wording itself. The constraints set out in the supporting text have been considered when arriving at the draft distribution of development. Comments on individual sites are addressed in the relevant part of this document, and the distribution of sites will be considered further through the update to the Housing and Economic Land Availability Assessment and the ongoing Sustainability Appraisal work.

<b>Policy S19 – North of the Plan Area</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 1	1	0	0	1
Policy: 10	10	1	4	5
Representation numbers				
95, 111, 694, 786, 1331, 1890, 1877, 2837, 2250 (Historic England), 2251 (Historic England), 3132				
Summary of issues and key comments raised by residents and other respondents				
Distribution of housing				
<ul style="list-style-type: none"> <li>• North of district more accessible than south. Need more affordable housing in SDNP, villages and communities on periphery.</li> <li>• Balance provision for city and limited development in national park for those working locally and requiring affordable housing.</li> <li>• North of Chichester should take a larger share of required housing, rather than along the A259 and Tangmere.</li> <li>• SDNP should share some of development or have northern route around Chichester.</li> </ul>				
Policy wording				
<ul style="list-style-type: none"> <li>• Too restrictive; does not allow flexibility for small scale housing not included in Policies S3 and S5.</li> </ul>				
Historic environment				
<ul style="list-style-type: none"> <li>• Paragraph 2.2 notes North of the Plan Area has "rich cultural and heritage assets". Paragraph 4.128 should mention these assets. <b>(Historic England)</b></li> <li>• Support "Conserve and enhance the rural character of the area, the quality of its landscape and the natural and historic environment;" as part of positive strategy required by paragraph 185 of the NPPF. <b>(Historic England)</b></li> </ul>				
Bus services				
<ul style="list-style-type: none"> <li>• Last bullet point not compatible with WSCC's decision to cut bus services.</li> </ul>				
Plaistow settlement boundary				
<ul style="list-style-type: none"> <li>• Plaistow village should have a defined settlement boundary.</li> </ul>				
Councillor Influence				
<ul style="list-style-type: none"> <li>• If the north is generally excluded from development, should councillors have undue influence when voting on issues that are not going to affect their area?</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
<p>The north of plan area comprises those areas within the district which do not fall within the National Park. The description of the characteristics of this area is considered to be reasonable, and the presence of significant settlements in nearby local authority areas is noted in the text. It is worth noting the north of the plan area is considered a rural area under the Housing Act and therefore the rural exceptions policy applies.</p> <p>The characteristics of Plaistow means a legible, coherent settlement boundary is difficult to establish.</p> <p>Ultimately, the production and adoption of the Plan is a matter for the whole District Council as Local Planning Authority. In Chichester, engagement with Parish Councils and the focus on neighbourhood planning provides an additional local emphasis for decision taking.</p>				

<b>Policy S20 Design</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 4	4	1	0	3
Policy: 30	32	17	4	11
Representation numbers				
2252 (Historic England), 3248 (WSCC Estates), 3181, 127, 242, 719 (West Itchenor PC), 728, 678, 1842, 2104 (WSCC), 2197 (Env Agency), 2253 (Historic England), 2638 (Barton Willmore), 3248 (WSCC Estates), 2728 (Sussex Wildlife Trust), 2881, 2968, 3181, 1211, 377, 3512 (HMPC Ltd), 587, 973 (Chichester CAAC), 2422 (SDNPA), 6629, 2594 (Turley obo Countryside Properties), 117, 380, 446, 486, 1131, 1321, 1615, 2349, 2384, 2281, 3069 (Chichester Harbour Conservancy), 695, 1257 (North Mundham PC)				
Summary of issues and key comments raised by residents and other respondents				
Support overall policy: <b>(Historic England, WSCC Estates, West Itchenor PC, WSCC, Env Agency, Barton Willmore, Sussex Wildlife Trust)</b>				
Need positive approach to secure high quality design: <ul style="list-style-type: none"> <li>• Recognise design, infrastructure, character of places</li> <li>• Take proactive approach <b>(SDNPA)</b></li> <li>• Maintain communities' distinctive character <b>(HMPC Ltd)</b></li> <li>• Support modal shift to prevent climate change</li> </ul>				
Suggest minor wording amendments to strengthen policy including for AONB, Pagham, Medmerry, sense of place, climate neutral buildings, public rights of way, trees, parking etc. <b>(Turley obo Countryside Properties, Chichester Harbour Conservancy)</b>				
Communities' views can contribute to process.				
Scale of development will fail to respond to site and surroundings. <b>(North Mundham PC)</b>				
Initial Council response to issues raised and way forward for the Local Plan Review				
Taking the comments as a whole, there seems to be broad agreement to the aims of this draft policy. A number of suggestions have been made for detailed amendments. These will be considered further, alongside the newly published national design guidance, and any appropriate amendments will be reflected in the next iteration of the Plan.				

<b>Policy S21 Health and Wellbeing</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 5	5	2	0	3
Policy: 11	11	4	2	5
Representation numbers				
3070 (Chichester Harbour Conservancy), 2942, 1622, 2017 (Sport England), 1622, 3249 (WSCC Estates), 2639, 493, 3217, 1000, 1258 (North Mundham PC), 1309, 950, 696, 1800, 3136, 2350				
Summary of issues and key comments raised by residents and other respondents				
Support for policy: <b>(Sport England, WSCC Estates)</b>				
Impact on infrastructure: <ul style="list-style-type: none"> <li>• Reference to expanding capacity of surgeries and hospital due to projected increasing population numbers over the plan period.</li> <li>• No mention of provision of care for ageing population, specifically for elderly/dementia sufferers. No specific planning policy protecting or necessitating dementia care facilities; this has caused issues in the past.</li> </ul>				
Reference to supporting documents: <ul style="list-style-type: none"> <li>• Additional wording to include reference to Sport England's 'Active Design' guidance to strengthen the policy <b>(Sport England)</b>.</li> </ul>				
Impact of development: <ul style="list-style-type: none"> <li>• Consideration upon health and wellbeing, from loss of natural environment, increased pollution, traffic congestion, strain on schools, health and social facilities <b>(North Mundham PC)</b>.</li> <li>• Much more needs to be included to encourage healthy living such as all facilities being within walking distance.</li> <li>• Safe green spaces should be considered as part of wellbeing planning.</li> <li>• This objective is supported but should encourage all NMU activity not limited to walking and cycling <b>(West Sussex Local Access Forum)</b>.</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
Comments regarding the capacity of health infrastructure are noted. The plan's approach to this is set out in draft policy S12. Comments regarding an ageing population are noted. The plan deals with specialist housing in draft policy DM1. Nonetheless, it is considered that this policy could be usefully expanded to make expectations clearer and address the particular characteristics of Chichester, including a growing, relatively elderly population.				

<b>Policy S22 Historic Environment</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 1	1	0	0	1
Policy: 14	15	7	2	6
Representation numbers				
6909, 1482 (Theatres' Trust), 2256 (Historic England), 3250 (WSCC), 2254 (Historic England), 3071 (Chichester Harbour Conservancy), 3506, (Historic England), 3513, 915, 974 (Chichester CAAC), 3138, 7057, 1628, 2658 (Church Commissioners), 2969, 2582 (Lavant PC)				
Summary of issues and key comments raised by residents and other respondents				
Support in principle: <b>(Historic England, Theatres' Trust, WSCC)</b>				
Heritage assets: <ul style="list-style-type: none"> <li>• Suggest inclusion of text to set out requirements of applicants for adequate description of significance of asset, proportionate to its significance and sufficient to understand impact of proposals <b>(Historic England)</b></li> <li>• Improve explanation and text relating to heritage at risk <b>(Historic England)</b></li> <li>• Definition of heritage too narrow; should older buildings be replaced with new carbon neutral, retrofit and preserve examples of 20<sup>th</sup> century architecture</li> <li>• Should include all historic routes</li> <li>• Take positive approach to improvement of assets at or vulnerable to risk; add text to support proposals for disused, redundant designated and non-designated assets into meaningful use (e.g. underused barns) <b>(Church Commissioners)</b></li> </ul>				
Evidence base: <ul style="list-style-type: none"> <li>• Require up to date and adequate evidence base; historic environment strategy is not sufficient <b>(Historic England, Chichester Harbour Conservancy)</b></li> </ul>				
Historic environment: <ul style="list-style-type: none"> <li>• CDC to need to recognise heritage assets and resource accordingly <b>(Chichester CAAC)</b></li> </ul>				
Archaeology: <ul style="list-style-type: none"> <li>• Important to factor in preliminary evaluation in resource implications of development and avoid loss of irreplaceable data.</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
Whilst the comments are broadly supportive a number of detailed suggestions by Historic England and others will be considered further and any appropriate amendments to the detailed policy wording will be reflected in the next iteration of this plan. Comments received from Historic England regarding the evidence base are being considered with a view to clearly identifying the existing evidence base and identifying any necessary additional work.				

<b>Policy S23 Transport and Accessibility</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 37	40	3	22	15
Policy: 164	194	14	117	63
Representation numbers				
<p>3555 (Highways England), 3541, 3542, 2000, 3537, 3528, 3525 (West Wittering PC), 3509, 3508/2442 (SDNPA), 3505, 3496, 3490, 3485, 3452, 3251 (WSCC Estates), 3165, 3161, 3152, 3051 (Arun DC), 2906, 2905/2904, 2851, 2841, 2805, 2729 (SWT), 2718, 2717, 2657 (Church Commissioners for England), 2650, 2630, 2579 (Lavant PC), 2575 (Earnley PC), 2567 (Friends of Pagham Harbour), 2538, 2525 (Sidlesham PC), 2516 (Bosham PC), 2495 (Chidham &amp; Hambrook PC), 2479/824 (Fishbourne PC), 2469/2470 (Southbourne PC), 2385, 2353/2351 (WS Local Access Forum, 2324, 2213, 2198 (EA), 2108/2095 (WSCC), 2046, 2034 (Summersdale RA), 2012, 2003, 2001, 1981, 1963, 1958, 1937, 1906, 1896, 1887, 1882, 1867, 1863, 1858, 1855, 1853, 1843, 1828, 1814, 1786, 1780, 1695, 1688, 1683, 1677, 1663, 1619, 1616, 1613, 1602, 1596, 1578, 1574, 1573, 1560, 1546, 1503, 1493, 1489, 1474, 1465, 1458, 1455, 1449, 1443, (Donnington PC), 1429, 1414/867/866, 1413, 1378, 1375, 1364, 1358, 1339, 1325, 1310, 1287, 1267, 1259 (North Mundham PC), 1237, 1230, 1215, 1200, 1163, 1155, 1128, 1119, 1105, 1087, 1072, 1061, 1049, 1033, 1032, 1031, 1015, 1014, 998/990 (Birdham PC), 997, 959, 945, 939/937/936 (Pagham PC), 872, 856, 847, 806, 796, 794, 785, 778, 775, 768, 766, 754, 733, 720 (West Itchenor PC), 672, 650, 644, 641, 627, 625 (Dell Quay Sailing Club), 618, 617, 595, 589, 588, 570, 555, 554, 540, 519, 511, 500, 487, 477, 466, 455, 454, 448, 379, 369, 355, 341, 340, 329, 328, 324, 312, 294, 286, 284, 266, 264, 262, 243, 187 (Friends of Brandy Hole Copse), 177, 128 (Chichester Society), 118, 110, 69, 3219, 3143, 1829, 1749 (Harbour Villages Lib Dems Campaign Team), 1689, 1680, 1594, 1193, 1187, 1132 (British Horse Society), 1125 (Chichester and District Cycle Forum), 1109, 1067, 1059, 1041, 980, 967, 943, 941, 932, 914, 910, 899, 894, 883, 698, 591, 564, 505, 342, 319, 278, 265, 193, 33</p>				
Summary of issues and key comments raised by residents and other respondents				
<p>Support</p> <ul style="list-style-type: none"> <li>• Generally (<b>WSCC Estates, Church Commissioners for England, Summersdale RA, West Itchenor PC, Chichester Society</b>)</li> <li>• Car Sharing Clubs</li> <li>• Junction on A27 at Southbourne</li> <li>• Support Donnington bypass</li> <li>• Support given the loss of HE2b proposal (<b>Lavant PC</b>)</li> <li>• Support creation of integrated travel plan (<b>Bosham PC, Chidham and Hambrook PC, Southbourne PC</b>) including cycle (<b>C&amp;H PC, Southbourne PC</b>) and pedestrian routes (<b>Southbourne PC</b>)</li> <li>• Support in principle, particularly for sustainable modes (<b>SDNPA</b>)</li> <li>• Inclusion of PROW welcomed (<b>WSLAF</b>)</li> <li>• Support proposals to mitigate impacts of development in A27 improvements</li> <li>• Support link road</li> <li>• Support EV charging provision</li> <li>• Support northern route option</li> <li>• Support para 5.27 as supports Southbourne’s desire for pedestrian bridge over railway (<b>Southbourne PC</b>)</li> <li>• Support para 5.15 – good to see bridleways included (<b>British Horse Society</b>)</li> <li>• Support commitment to improve highway infrastructure for cyclists and pedestrians (<b>Chi and District Cycle Forum</b>)</li> </ul>				
Consultant’s report				

- Obscure, contradictory, lacking coherence, unviable, transport model incorrect and outdated
- Option 3a rejected
- Fails to consider mitigating climate change, minimising pollution and protecting character of area from visual intrusion
- Insufficient weight given to sustainable transport; no provision for walking/cycling from Chichester centre to AL6 area
- Fails to consider impact of existing housing combined with future planned housing
- No provision for impact of 2250 homes between Southbourne and Fishbourne **(Chidham and Hambrook PC)**
- Restricted scope of study, fails to examine local network impacts **(Southbourne PC)**
- It's not clear what impact Scenario 1 will have on A286 **(SDNPA)**
- Routes considered for mitigation not considered equally
- Does not explore medium/long term transport infrastructure
- Proposals detrimental to Parklands
- Clarify diagrams and text regarding A27 junctions 14 and 15 (Stockbridge and Whyke)
- Transport Study insufficiently robust for MP
- Appendix F (Journey Times) to PBA Report does not include a comparison of journey impacted by "No Right Turn" restrictions
- Para 1.2.3 as referred as para 3.4.2 in Transport Study has been removed – reinstate
- No modelling for holidays/events; modelling does not recognise reality of summer traffic at tourist hotspots
- Clearer explanation of table 5.3 required
- Query air quality assessments informing study

#### Further work

- Realistic estimate of costs for A27 mitigation works **(Highways England)**
- Feasibility work necessary prior to submission **(WSCC)**
- New viability testing to establish extent of contributions from development **(Highways England)**
- Consider other viable options for A27 junctions in lieu of link road **(Highways England)**
- CBA on A27 junction alterations
- Update Planning Obligations & Affordable Housing SPD to reflect new housing development increasing traffic/contributions required from all sites **(Highways England)**
- Redo analysis of traffic flows especially Bournes area
- Need calculations of increased journey times based on restricted right turns on Stockbridge Road
- Increases in summer traffic to beaches should be considered in travel plan (Fishbourne PC) and general tourist/holiday season as well as Goodwood events
- Integrated transport plan for Area West of Chichester needed
- Consider additional junction on to A27 in both directions between Southbourne and Fishbourne
- Further assessment of new junction onto A27 at Southbourne
- Junction between Norwich Road and St Paul's Road needs to be resolved
- Consider traffic light options for the two roundabouts
- Assessments of air quality and accident numbers from increased traffic at Fishbourne roundabout (WW PC)
- Provide clarification on mitigation for resolving commuting pressures **(Arun DC)**
- Update understanding of effects of proposed alterations and mitigation to A27 on

local journeys

- Provide advice to PC's undertaking NP's for strategic allocations to assess impacts of allocation on local network to aid site selection (**Chidham and Hambrook PC, Southbourne PC**)
- Independent study of effects of traffic arising from planned new developments should identify impact on local communities as well as how air quality; noise and light pollution will impact upon AONB and health and well-being of Chichester residents
- Impact of additional traffic on Clay Lane should be assessed (Fishbourne and other east/west corridor service villages use road to access Chichester and west of Chichester to avoid A27)
- Need detailed transport study of A259 Emsworth to Fishbourne with mitigation identified for reducing pressure on A259 generally
- Consider alternative entry point for MP traffic joining A27 near Fishbourne roundabout instead of directly onto roundabout – left/eastward merge onto A27
- Real-time transport survey work to fully assess impact of proposed development, particularly on MP
- Add specific, innovatory alternatives to policy; additional focus/weight given to cycling and other sustainable transport methods
- Include measures to improve inner city junctions to allocate more space to pedestrians and cyclists eg; New Park Road junction near the University, Eastgate and the roundabout near Sainsburys
- Explain why no assessment of impact to AQ/health from construction work and its impact on highway congestion
- Commission report on how PBA measures achieve sustainable improvement in three AQMAs; reduction in noise, accident rates, light pollution and congestion need to be demonstrated in monetised outputs
- Add measurable targets for uptake of public transport, reduction in CO2 and other pollutants
- Analysis of costs and options for achieving a solution for through traffic

#### Funding

- Exceeds likely developer contributions (**West Wittering PC**)
- Lack of investment
- CIL money should push forward measures addressing climate change obligations, health needs, sustainable travel
- Monies should not be used to improve a HE road
- Clarification of funding sources sought (**Lavant PC**)
- Study estimate of £68m beyond level that could be funded by developer contributions (**Earnley PC**)
- Development in Selsey should contribute to upgrade of B2145 as Selsey commuters cause pollution/noise and traffic (**Sidlesham PC**)
- Pursue RIS2 Government funding
- Query whether developer contributions will include significant new economic/ business development as well as significant "windfall" housing development not identified in LP or whether they will avoid contributing to A27 improvements
- Since costs beyond S106/S278 possible funding, question whether Plan will fail viability tests
- Traffic mitigation measures not deliverable as no defined funding plan
- Use S106/S278 funds to provide dedicated cycle route from Chichester into the peninsula and east to west, segregated from road traffic
- Cost of mitigation exceeds figure supported by value of developer contributions therefore strategy will depend on external funding, LPR should set out how it will deal with funding uncertainty (**WSCC**)

#### Link Road

- General adverse impact (**Dell Quay Sailing Club**)
- Remove/abandon (**Birdham PC**)
- Unnecessary due to A27 works and changes in vehicle use (**Summersdale RA**)
- Upgrade A27 sympathetically, avoid building link road
- Wildlife/environment/recreation concerns
- Increased capacity will induce demand
- Will redirect local traffic along congested minor roads of MP, prevent easy access to A27 and A259 (**Southbourne PC**)
- Support link road to reduce traffic through Donnington
- Build before A27 improvements
- Will double journey times
- Increase danger (**Fishbourne PC**)
- Proximity to harbour
- Build link road into grassed/tree lined bank with noise barriers/reducing surfaces
- Link road would push traffic south where roads not capable of coping with increased traffic
- Must be mitigated by flyover east to west at Fishbourne A27 junction
- Concern over level of road
- Link road would need raising as this would destroy views of cathedral
- Link road will be detrimental to West Wittering beach traffic in the summer
- No evidence of consultation with HE
- Increase in light pollution
- Run-off from link road could enter water at River Lavant and also running into the Harbour

#### A27 improvements:

- General objection to junction improvements
- Need to ensure land outside highway boundary is available (**WSCC**)
- Allow right turns from A27 to A286/B2145
- Right turn ban would increase traffic flows to MP (WW PC) disadvantage Donnington and Hunston residents
- Stockbridge roundabout previously found not suited to signalisation
- Addition of traffic lights at Stockbridge will improve situation for those crossing it
- Bognor roundabout will be at full capacity
- Against no-right turns
- Propose Systra's long term plan for bypass
- Support fly-overs at Fishbourne and Bognor junctions with underpasses at Whyke and Stockbridge junctions
- Support fly-over at Stockbridge
- Support northern A27 route - would halve traffic and lessen pollution; should be mentioned in policy – would obviate need for link road and could separate through and local traffic
- Policy delays preparation for a northern relief road
- Reject northern route; unaffordable
- Should be fully assessed for potential adverse impacts on landscape (SDNPA)
- No viable long-term A27 bypass solution; housing numbers not deliverable without acceptable solution
- Mitigation measures not enough
- General concern re; roundabout changes; remove junction changes to roundabouts
- Oppose closure of link to Terminus Road
- Plan should consider ways to reduce peak-time traffic volumes at roundabouts

- Infrastructure in place before developments commence (**Birdham PC, Fishbourne PC**)
- Donnington residents hugely disadvantaged by junction improvements (**Donnington PC**)
- Object to 3 years of work for each junction amounting to 15 years of disruption (**Birdham PC**)
- Significant deleterious effect on travel options for population south of A27 (**North Mundham PC**)
- Hamburger junctions will cause major delays at peak times and additional miles in order to travel eastwards from south of A27
- Suggest radical re-structure of Fishbourne roundabout with A27 unrestricted and north/south crossing via tunnel
- Question whether junction improvements are included within policy requirements (**Pagham PC**)
- Improvements contrary to Policy S28 Pollution (**Pagham PC**)
- Concerted effort to get into RSI programme with HE and design sustainable low pollution improvement for the A27
- Loss of traffic lights at Oving/Leave Oving crossing alone
- A27 improvements must be carried out sympathetically towards local residents

#### Congestion

- Concern re; increased traffic on main and back roads from existing and future development (**Donnington PC**)
- Hinders access
- Potential congestion on canal path
- No proposals to manage additional traffic on A259 (**Dell Quay Sailing Club**)
- Link Road will increase congestion on A286 and A27 Fishbourne roundabout
- A27 – serious disruption occurs every summer weekend with people trying to access MP/West Wittering beaches/Goodwood motor and horse racing
- A27 congested, dangerous and polluting
- A286 already gridlocked especially during summer (**Birdham PC**)
- No acceptable mitigation proposals re; increased congestion especially to improve traffic flows on A27 (**Birdham PC**)
- Longer journeys
- Concern re; fatalities caused by congestion (**Birdham PC**)
- Reverse roads-first approach as transport priority
- Plan favours through traffic (**Pagham PC**)
- Housing on MP would require mitigation for traffic (Earnley PC)/worsening traffic congestion on MP needs to be dealt with
- Chichester Selsey Road increased congestion will raise accident numbers unless better crossing facilities provided for pedestrian/cyclists (Friends of Pagham Harbour)
- Moratorium on applications resulting in more traffic on road network until route agreed for bypass (**Fishbourne PC**)
- Concern re; Southbourne railway crossing congestion
- Plan not robust enough to cope with future traffic especially rush hour/bank holidays
- Oving Road crossing will increase traffic in St James' Road
- Make improvements to A286 roundabout to improve flow of traffic
- Separate through traffic from local traffic on A27
- Establish an integrated and sustainable plan for future traffic flows (**Friends of Brandy Hole Copse**)
- Congestion caused by railway crossings not addressed (**North Mundham PC**)
- Sustainable transport – cycling, buses and trains are the only solution to encourage people to leave cars at home (**Chi and District Cycle Forum**)

- Need to improve local transport links on existing roads to south of City and ensure traffic can move easily north-south across A27

Access:

- Residents will have no access to the East from Donnington & MP; reduces access to city
- Donnington will be cut off from the city
- Traffic increase will cause access issues for
  - westbound traffic from A27 accessing town
  - Eastbound traffic accessing Donnington, Witterings, Hunston and Manhood
- Rat runs likely to develop, unsuitable narrow residential roads will be used
- Cars are only form of transport in some areas – policy should not be too restrictive (**Church Commissioners for England**)
- Access to A27 at Fishbourne will be worsened by addition of no right turns at roundabouts; hamburger junction will be gridlocked in summer (**Chidham and Hambrook PC**)
- Access will be reduced by link road (**Fishbourne PC**) especially accessibility to already congested Fishbourne roundabout with a loss of a right hand turn
- Access limited by no right turns
- Remove restricted access at junctions and Stockbridge Link Road
- Concern over restriction of access on to MP
- Access will be obstructed to local businesses by traffic tailbacks
- Restricting access to A27 at Stockbridge and Wyke junctions will force traffic on to local streets
- Access roads to MP stretched to capacity, A286 frequently blocked during summer months up to Stockbridge roundabout

Local issues:

- Homes devalued
- Commuting for employment (**Sidlesham PC, Birdham PC**) will create financial burden due to added commuting costs
- Local journeys will be longer
- Improvements will lead to unacceptable detours for residents in Donnington
- Ageing population disadvantaged by not having technology to access real-time travel information or car restrictive measures
- Through traffic prioritised over local traffic (**Donnington PC**)
- Air and Noise pollution
- Long construction period impacting upon the economy not considered
- MP cannot cope with more development without complete upgrade of A27
- Impact on Free School
- Severe detrimental impact on Donnington and Apuldram residents
- Congestion created at Fishbourne roundabout will be damaging to local communities, businesses and tourism (**Harbour Villages Lib Dems Campaign Team**)
- Restrict car parking in new developments

Cyclists/Pedestrian/Equestrian

- Fails to demonstrate that cycling or walking routes will be enhanced
- Prioritise cycling and walking
- Join up existing PROW to enable access to SDNP (**SDNPA**)
- Upgrading appropriate/suitable PROW to bridleways would contribute to WS Transport Plan aim of “improving safety for all road users” mentioned in para 5.18

**(British Horse Society)**

- Install better walking and cycling infrastructure connecting all 4 quadrants of city outskirts to the centre
- identify important cycle network routes for development (**Lavant PC, Bosham PC**) and pedestrian routes (**Bosham PC, Chi and District Cycle Forum**)
- Provide generous cycle routes not just lines on the road; segregated cycle routes on busy roads between settlements
- Dedicated cycle routes that link in with existing routes on highways (**Harbour Villages Lib Dems Campaign Team**)
- Concern re; increased accidents and increased pollution
- Cycleways not viable on access roads to MP
- Recognise potential of cycling to mitigate traffic increases/promote as sustainable form of transport
- Recognise necessity of upkeep of established cycle routes ie; Centurion Way and Canal route in accordance with NICE guidelines (**Lavant PC**)
- Strongly support policy to secure off-road connection for Salterns Way and Centurion Way (**SDNPA**)
- Recommend maximising value of existing infrastructure to facilitate off-road user modes accessing either side of A27 (**WSCC**)
- Ensure cyclist and pedestrian safety at A27 roundabouts and generally
- Westhampnett Road near Sainsbury's, New Park Road, Eastgate, Northgate, Westgate and Southgate roundabouts need redesigning to allocate more space to cyclists and pedestrians
- A286 needs to be widened with dedicated cycle/horse routes or be cycle/horse free
- Provide more space for cyclists by removing street parking on Bognor Road and St Paul's Road to create cycle lanes
- Link road will negatively impact Salterns Way
- Provide new super cycle highway linking surrounding rural areas to Chichester
- New Strategic cycling provision between Chi and Emsworth (NCN2) in a segregated form to ensure safe movement for all transport users (**Sustrans**)
- More zebra crossings needed in Selsey especially Chichester Road
- West of Chi could act as corridor for increasing volumes of non-motorised transport (**WSCC**)
- Require developers to finance cycle infrastructure improvements to encourage 'new residents' to cycle/walk (**Chi and District Cycle Forum**)

**Rail**

- Pedestrian bridge over railway crossing at Southbourne should be included in policy (**Southbourne PC**)
- Railway barrier timings to operate more efficiently
- Poor rail links between Chidham & Hambrook, Bosham, Southbourne and Fishbourne
- Invest in rail infrastructure; seek investment from Network Rail for signalling systems to improve on delays at Chichester level crossings
- Invest in improved public transport links
- Increase public transport and make more affordable
- Suggest light railway link from MP
- Promote/prioritise public transport
- Reinstatement of peak hour frequency train service between villages on A259 corridor

**Buses**

- Provide for more bus lanes in policy
- Promote/prioritise public transport

<ul style="list-style-type: none"> <li>• Need park and ride provision; especially for events, summer, commuting – suggest site allocated for employment to the SW</li> <li>• Potential delays caused by A27 proposals</li> <li>• Poor bus links between Chidham &amp; Hambrook, Bosham, Southbourne and Fishbourne</li> <li>• Increase bus services</li> <li>• Invest in improved public transport links</li> <li>• Increase public transport and make more affordable</li> <li>• Provide more bus stops in Manor Road near Ellis Square</li> </ul>
<p>Sustainable cars</p> <ul style="list-style-type: none"> <li>• Provide for hydrogen refuelling cars</li> <li>• Promote electric cars and ensure enough charging points</li> </ul>
<p>Air Quality</p> <ul style="list-style-type: none"> <li>• No mitigation re; air quality decline in policy</li> <li>• Conflicts with DM24</li> <li>• Increased air pollution (<b>Pagham PC</b>)</li> <li>• Integrated public transport system essential to avoid congestion and pollution</li> <li>• Prevailing winds will carry pollution across Chichester District</li> <li>• Concern over pollution for residents around Stockbridge Road, pollution already exceeds recommended levels; 3 schools along route</li> <li>• Standing traffic at traffic lights will worsen situation (<b>Donnington PC, Pagham PC</b>)</li> <li>• Worsening air quality; should be primary consideration in transport solutions</li> <li>• No risk analysis of death from pollutants (<b>Earnley PC</b>) effects on health</li> <li>• Suggest trees and green planting to mitigate against traffic fumes</li> <li>• Established AQMAs not taken into account</li> <li>• Elevation of link road across flood plain takes pollution to bedroom window level</li> </ul>
<p>Noise Impact:</p> <ul style="list-style-type: none"> <li>• Conflicts with DM25</li> <li>• Will cause additional noise</li> <li>• Disturbance to AONB</li> <li>• Concern over noise pollution to residents of Stockbridge Road</li> <li>• Mitigation measures should reduce effects of additional traffic noise on Bracklesham Lane ie; in form of speed limit reduction to 30 mph</li> </ul>
<p>Climate change</p> <ul style="list-style-type: none"> <li>• Provide for Car Free Days in policy</li> <li>• Climate change commitments will be undermined by new link road</li> <li>• Lack of attention given to alternative sustainable transport options/public transport (<b>Sidlesham PC, Chidham and Hambrook PC, Dell Quay Sailing Club</b>)</li> <li>• Increase public transport and make more affordable</li> <li>• Discourage car use so that sustainable transport initiatives can be successful</li> <li>• Relief road is in conflict with IPCC</li> <li>• Transport measures need to take account of carbon emissions</li> </ul>
<p>Impact on Ecosystems/wildlife habitats</p> <ul style="list-style-type: none"> <li>• Link road adjacent to sites needing protection – general concern re; loss of/effect on wildlife as a result of link road</li> <li>• Link road area is within SSSI Impact Risk Zone which affects the SAC, SPA and Ramsar designations (<b>SWT</b>)</li> </ul>

- Concern re; impact of link road on setting of Fishbourne wildlife corridor (**Fishbourne PC**)
- Concern re; link road's general impact on environment (**Chidham and Hambrook PC, Southbourne PC**)
- Question survey data against biodiversity needs (**SWT**)
- Environmental degradation of AONB
- Major risk of obstruction to water vole and other wildlife corridors between Fishbourne meadow, Lavant, pond and ditches
- Link Road would impact on important migratory bird species

#### Landscape

- Impact of link road on views (**Chidham and Hambrook PC, Southbourne PC**)
- Improvements will destruct views of Cathedral and SDNP
- Link road on floodplain (**C&H PC**)/flood risk (**Fishbourne PC**), within flood zones 2 and 3 and crossing a number of watercourses (**Environment Agency**)
- Suggest explicit support for improving links into NP (**SDNPA**)
- Loss of landscape, character, beauty and greenery
- Concern re; loss of trees, hedges or bridge in works to Bognor Road roundabout
- Link road near Chichester Harbour AONB, Pagham Harbour SPA and Medmerry designated SPA (**Birdham PC**)
- Significant impact on Chi Harbour (SSSI and Ramsar Sites)
- Acknowledge role of trees/vegetation as part of transport infrastructure; promote design to retain established trees/hedgerows/vegetation as well as plant more
- Preserve unique views of cathedral from south

#### Changes to LPR Preferred Approach

- Change "road improvements" to "road workings"
- 5.15 Inclusion of bridleways welcomed though there should be specific inclusion of PROW (**WSLAF**)
- 5.16 Wording is misleading as provision of bridleways on Coastal Plain is very limited, restricting access for cyclists and equestrians. Upgrading suitable PROW to bridleways would improve access for all NMUs and contribute to the WS Transport Plan (2011-2016) to improve safety for all road users (**WSLAF**)
- 5.16 lists specific roads but not cycle paths – include existing cycle paths such as Centurion Way (NCR88), Salterns Way, Chi to Bognor Regis and Chi to Emsworth (NCR 2) - South Coast cycle route
- 5.16 Change to "There is an extensive public rights of way network across the plan area and a number of cycle paths, including the nationally important National Cycle Route Two. There are also several cycle routes that are currently incomplete but have great potential as drivers for tourism and to offer alternatives to the car on shorter journeys. These include Centurion Way (with a proposed extension to Midhurst), the Selsey Greenway (formerly the Selsey Cycle route) and the Chemroute (a proposed route between Chichester and Emsworth)
- 5.16 – Insert "and a number of nationally important cycle paths including the Salterns Way and Centurion Way that need to be preserved and enhanced"
- 5.16 – wording re; extensive public rights of way network is misleading since it implies the PROW network is available to all users whereas on coastal plain, PROW is entirely footpaths not for use by cyclists or equestrians (**British Horse Society**)
- 5.16 delete "...strategic road link between Havant and Eastbourne and replace with "...The A27 is part of the Strategic Route Network connecting the south coast from Folkestone to Honiton, including the major ports of Portsmouth and Southampton. It is also a local road with five junctions within a four mile stretch where local and through traffic compete for space"

- 5.18 misses reference to landscape protection
- 5.18 Insert “The strategy requires government input and earmarked funding to pre-plan the required integrated transport needed to enable the area’s residents to travel sustainably”
- 5.19 Amend to include “.... congestion in the city, on the Manhood Peninsula and the A27 junctions”
- 5.19 Insert “and on the Manhood Peninsula” after “Chichester City”. Remove “bypass” from “Chichester A27 bypass”
- 5.20 Insert “and coastal parts of the plan area” after “the more rural”
- 5.21 Change to “Without mitigation, and putting forward a fully financed integrated transport plan, this would lead...”
- 5.21 Add “from the through traffic on the A27,” after “Projected growth in road journeys” and add “and Manhood Peninsula and East West Corridor” at end of paragraph
- 5.22 Last sentence to read “Furthermore, the A27 with the current junctions design, and many local roads are often significantly over capacity”
- Table following para 5.31 and policy text to refer to road bridge proposed over railway in Southbourne NP
- Consider additional wording to reflect impacts upon SDNP being mitigated and opportunities taken to improve GI networks (**SDNPA**)
- Number paragraphs and sub-paragraphs for ease of reference throughout local plan (Councillor Simon Oakley)
- Paras 5.23-5.25 should be updated in light of HE response to reflect that no viable scheme capable of central government is available
- Policy needs to address paras 5.21 to 5.24
- 5.23 and 5.24 Insert “Local communities firmly voted against a southern relief road and no right turns on the A27 during the HE consultation. The PBA report has reintroduced elements into the plan that were rejected by local communities.”
- Para 5.26 should refer to County and District Councils’ preference for a northern bypass
- 5.26 Change to “To address this position, the Council will work with Highways England, The County Council, the local community and Network Rail and major development.... A central element of the strategy is a package of proposed improvements to the rail network and sustainable travel network.”
- Last sentence of policy to provide that consultation on planned transport measures takes place separately from LPR
- Additional comment between 5.26 and 5.27 as follows: ‘meanwhile the likely alignments of a northern route as identified in existing 2016 HE studies will be safeguarded against other development’ – repeat in policy
- 5.27 unrealistic expectations in light of recent bus timetable cuts
- 5.27 add “effects of behavioural change will be limited”
- 5.28 Insert at end of last paragraph “.... need to be carefully monitored and funding coordinated to prevent rat running through local communities, put in more crossings and safe cycle routes to cross the road”.
- 5.29 Change last sentence to “In preparation for such a situation arising, potential park and ride sites will be identified at a nearly stage of the plan period, and if necessary secured. Also a review may be required to revise the transport strategy for the city.”
- 5.29 add “benefits of Park and Ride will be limited
- 5.30 Third sentence: change to “Implementation of the necessary measures”
- Change third bullet point in S23 ‘Planning to achieve’ should read ‘Requirement to achieve’
- 5.30 Delete second “be” and after “S278” insert “Agreements”

- 5.31 Remove A27 junction improvements – Fishbourne, Stockbridge and Whyke roundabouts and the raised new road
- 5.31 Change to “Dutch-style roundabouts and allocation of more space to people who walk and cycle are needed to enable modal shift”
- Delete “New road connecting Birdham Road to A27 Fishbourne roundabout”
- Under “New Integrated Traffic Measures”, insert additional bullet point concerning cycling on Route NCN2 (**Sustrans**)
- 5.3.1 Add to Wider Plan Area row “small-scale junction improvements on A259 between Emsworth and Chichester
- 5.33 Change to “With Network Rail, train operators and local stakeholders to improve and extend services to facilitate..... The Council also works closely with bus operators to put in cleaner buses and extend their services”
- Sustainable transport measures required to mitigate planned developments through more detailed assessment of sites including pre-app (**WSCC**)
- Make it clear in the Plan text that discussions with Highways Agency to improve road network are ongoing

#### Initial Council response to issues raised and way forward for the Local Plan Review

In light of the number and range of comments and objections received to this policy, a detailed document has been prepared by consultants PBA (now Stantec) to consider detailed points. In addition, further sensitivity tests were carried out on the following four impacts –

1. Impact of additional flows at level crossings within the study area;

In summary, the results suggest that most of the level crossings on the A259 Main Road are predicted to maintain similar levels of delays generally seen in the base year, with the mitigation in place. However, the three level crossings in Chichester City are generally predicted to show delays greater than those in the base and in the Reference Case. The delays are generally shown to be relatively small and do not have any impact on route choice within the model

2. Impact of the Arundel bypass;

In summary, the modelling suggests that the impacts of the A27 Arundel Bypass will have the greatest impact in the area local to Arundel and flow increases on the Chichester Bypass will be relatively modest at less than 5% in most cases in both the AM and PM peaks.

3. Impact of Peak Spreading (i.e. longer periods of congestion);

The results demonstrate that the Local Plan development can be delivered without increasing overall delays in the modelled area and therefore, with the mitigation in place the reduction in over capacity queues will have a positive impact on associated consequences, such as air quality.

4. Impact of Allowing right turns at A27 junctions and on local traffic;

The results indicate, that allowing the right turns at the A27, results in reduced performance of the junctions and the creation of rat run routes through Chichester City centre.

Full details are included in the document *Chichester District Local Plan Transport Study: Responses to Representations Received through the Consultation Process*.

Further consideration of the representations received, additional transport work has been commissioned to develop further the findings of the study –

- a. Review the assumptions on committed developments used in the Reference Case

- b. Appraise the removal of Stockbridge Link Road as mitigation
- c. Model additional spatial development options
- d. Advise on implications for any need to phase development; and
- e. Consider further the extent to which a new road crossing over the railway line in Southbourne may be required in planning terms.

In addition, further work to consider the feasibility of the proposed mitigation is being commissioned, with the aim to provide all parties with greater comfort that the cost estimates for the proposed mitigation are robust, and that the strategic mitigation is ultimately deliverable.

The findings of this work will inform the ongoing development of the Plan. Further points raised in the consultation, including proposed amendments to the policy wording, will also be addressed in the next iteration of the Plan.

<b>Policy S24 Countryside</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 19	19	3	4	12
Policy: 40	44	7	20	17
Representation numbers				
3519, 1133, 2487 (Fishbourne Parish Council), 2257 (Historic England), 1260 (North Mundham Parish Council), 2400 (South Downs National Park Authority), 1340, 381, 190, 267, 1755, 3499, 825 (Fishbourne Parish Council) 3073 (Chichester Harbour Conservancy), 1692, 1784, 2528 (Sidlesham Parish Council), 2461 (Southbourne Parish Council), 2971, 3518, 3074 (Chichester Harbour Conservancy), 2710, 2107 (West Sussex County Council), 3030, 2891, 2609, 2386, 2212, 1597, 1950, 1951, 1948, 2740, 1234, 1527, 2547, 52, 3322, 2839, 3430, 1016, 1782, 1359, 370, 901, 1949, 1702, 3419, 3426, 2920, 3275, 3335, 3342, 3365, 3383, 3390, 2480 (Fishbourne Parish Council), 2730, 2864, 2527 (Sidlesham Parish Council), 2659, 3283 (Westbourne Parish Council), 2943 (CPRE Sussex)				
Summary of issues and key comments raised by residents and other respondents				
Support for policy:( <b>Sidlesham PC, Southbourne PC, Westbourne PC, CPRE Sussex</b> )				
Rural assets: <ul style="list-style-type: none"> <li>Promote protection of existing traditional barns/agri buildings/ equine businesses through sensitive reuse (<b>WSCC, Church Commissioners for England</b>).</li> <li>Make reference to Chichester Harbour AONB, SSSI and SAC</li> <li>Emphasis should be placed on protection of high grade agricultural land (grade 1 - 3a), biodiversity, structural tree planting (drainage,co2 reduction). Positive approach to recreational access supporting green tourism should form part of policies. (<b>Sidlesham PC</b>)</li> <li>Recognise value of agricultural coastal plain. Consider introduction/preservation of bees and habitats. Greater support to establishment of community orchard and nut plantations. (<b>Southbourne PC</b>)</li> </ul>				
Gaps <ul style="list-style-type: none"> <li>Suggest time frame of 25 years for gaps to be in place (<b>Harbour Villages Lib Dems Campaign Team</b>).</li> <li>Delay decisions on allocations affected by gaps until policy added to Plan. (<b>Fishbourne PC</b>)</li> <li>Strengthen policy to protect gaps; impact on landscape character, context and setting of AONB and NP; coalescence of settlements. (<b>Chichester Harbour Trust</b>)</li> <li>Support policy for Countryside Gaps to prevent erosion of open countryside and prevent coalescence of settlements.</li> </ul>				
Settlement boundaries: <ul style="list-style-type: none"> <li>If can't meet OAN additional sites should be adjacent to, but outside of, the settlement boundary.</li> <li>Why have settlement boundaries if they can be extended and built on.</li> <li>Revise policy to ensure plan flexibility e.g. edge of settlement boundaries.</li> <li>Object to boundary reviews; could increase supply of windfall sites and reduce requirement for new greenfield allocations in later DPD or NP; could also secure benefits from redevelopment of previously developed sites or sites abutting boundary and relate to built up area rather than countryside. (<b>Seaward Properties</b>)</li> <li>If no settlement boundary reviews amend last sentence of S24(<b>Seaward</b></li> </ul>				

<p><b>Properties)</b></p> <ul style="list-style-type: none"> <li>• Unclear how S24 is applied in respect of AL site-based allocations.. Para 5.42 refers to study to inform analysis; this is needed prior to decisions on boundaries (<b>Heaver Homes Ltd</b>)</li> <li>• Marina should be considered within a settlement boundary in recognition of number of dwellings/employment/leisure opportunities it provides. Policy does not recognise contribution of other sites to jobs and homes. Suggest policy rewording (<b>Premier Marinas</b>)</li> <li>• Object to the way the settlement policy boundary reviews are proposed. Propose a settlement boundary amendment for Fishbourne to include land south of Clay Lane/west of Blackboy Lane.( <b>Landacre Developments Ltd</b>)</li> <li>• We propose a settlement boundary amendment for Fishbourne to include land to the rear of 98 Fishbourne Road. (<b>Seaward Properties</b>)</li> <li>• Land to the rear of Sturt Avenue should be within the settlement boundary for Lynchmere (2839)</li> </ul>
<p>Designations</p> <ul style="list-style-type: none"> <li>• Consideration of development within parish of North Mundham should take account of diminished resource of countryside. (<b>North Mundham PC</b>)</li> <li>• Policy suggested to protect rural areas and enhance their character by tree planting, improvement to roadside environment, traffic management. (<b>Sidlesham PC</b>)</li> </ul>
<p>North of city</p> <ul style="list-style-type: none"> <li>• Important District retains existing open land to the north and north east of the city.</li> <li>• Lavant not included - no mention of its settlement area and so the status of the area of Lavant outside of the SDNP is not defined.</li> </ul>
<p>Fishbourne/Bethwines Farm</p> <ul style="list-style-type: none"> <li>• Support policy but building on Bethwines would be hypocritical and erode gap between settlements (<b>Fishbourne PC</b>)</li> </ul>
<p>Chichester Harbour AONB</p> <ul style="list-style-type: none"> <li>• Pagham and Chichester Harbours should be kept separate; Chichester Harbour has list of 10 special qualities that constitute AONB designation that are not "characteristics" and they do not apply to Pagham Harbour. (<b>Chichester Harbour Conservancy</b>)</li> </ul>
<p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Overlooks biodiversity loss and needs which may allow developments to increase catastrophic losses of recent years.</li> <li>• Make reference to ecosystem character. Unacceptable harm should not be confined to appearance of countryside but include ecosystems and biodiversity.</li> <li>• No reference in policy to natural environment or biodiversity (<b>Sussex Wildlife Trust</b>)</li> </ul>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p>
<p>Draft policy DM21 sets out the plan approach to alterations, change of use and/or re-use of existing buildings in the countryside, whilst draft policy DM22 sets out more detail on the general approach to development in the countryside.</p> <p>It is considered essential that subsequent development plan documents or neighbourhood plans are able to amend the defined settlement boundaries.</p> <p>A study of the potential for introduction of gaps between various settlements across the plan area has been prepared indicates there is justification for the identification of gaps between settlements. It is intended that the next iteration of the plan identifies key areas for settlement gaps, with the exact boundaries to be set in subsequent development plan documents and neighbourhood plans, and makes it clear that additional settlement gaps can</p>

be identified where justified.

Suggestions for detailed amendments to the settlement boundaries will be considered further for potential inclusion in the next iteration of the plan. The inclusion of more precise policy wording, potentially in another part of the plan, will also be considered in relation to the definition of settlement policy boundaries.

<b>Policy S25 The Coast</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 1	1	0	1	0
Policy: 13	13	3	3	7
Representation numbers				
3075 (Chichester Harbour Conservancy), 3076 (Chichester Harbour Conservancy), 83 (Marine Management Organisation), 1261 (North Mundham PC), 2530 (Sidlesham PC), 2424, 3162, 2907, 541, 713, 2462 (Southbourne PC), 2200 (Environment Agency), 2610 (Premier Marinas), 2548 (Chichester Harbour Trust)				
Summary of issues and key comments raised by residents and other respondents				
Support in principle: <b>(Environment Agency, Premier Marinas, Chichester Harbour Trust)</b>				
Evidence base/guidance documents: <ul style="list-style-type: none"> <li>• Include reference to other relevant documents such as Pagham Harbour Management Plan, Chichester Harbour AONB Management Plan, South Marine Plan Area, Sustainable Shorelines <b>(Chichester Harbour Conservancy, Marine Management Organisation)</b></li> <li>• Include reference to all statutory designations within the area, Special Protection Area (SPA) <b>(Chichester Harbour Conservancy)</b></li> </ul>				
Impact of development on coast: <ul style="list-style-type: none"> <li>• Refer to issues around adapting to climate change, including potential for protecting and enhancing the coast and mitigation for coastal squeeze. <b>(Chichester Harbour Conservancy, North Mundham PC)</b></li> <li>• Support for new opportunities to create saltmarsh and coastal grazing marsh in medium to long term. <b>(Environment Agency)</b></li> <li>• Consider the importance of Chichester Harbour's drainage function <b>(Sidlesham PC)</b></li> <li>• Over development appears obstructive for future tourist industry in terms of creating an unattractive environment.</li> </ul>				
Marine industry <ul style="list-style-type: none"> <li>• Support recognition of leisure, recreational use and water based activities and marine employment. Need policy approach to consider uses suitable to maintain sites as important recreational, economic and environmental resources. <b>(Premier Marinas)</b></li> </ul>				
Wastewater <ul style="list-style-type: none"> <li>• The policy needs to address wastewater infrastructure capacity and discharging of untreated waste and include a strategy for mitigating pressure on harbour by providing alternative routes. <b>(Southbourne PC)</b></li> <li>• Link with policies promoting wildlife corridors/gaps/green or blue space. Work with agricultural/horticultural business to reduce impact of chemical and nutrient run off into Harbour. <b>(Southbourne PC)</b></li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
It is considered that the plan should include more explicit reference to other relevant documents such as Pagham Harbour Management Plan, Chichester Harbour AONB Management Plan, and the next iteration of the Plan will do so. It is also considered that this policy should include more explicit reference to the coastal implications of climate change, including (but not limited to) the potential to mitigate coastal squeeze and the creation of new habitats. The draft policy does recognise the leisure resource provided by the coast.				

The comments regarding links with wildlife corridors and green gaps are noted. The identification of wildlife corridors should be highlighted in the supporting text to this policy and will be incorporated in the next iteration of the local plan.

Comments regarding wastewater, drainage and by implication the sensitive environment of Chichester Harbour are noted. The capacity of wastewater infrastructure is being considered through the specific evidence and the Infrastructure delivery Plan. Should the results of that work indicate a phased approach to development, or a total limit on capacity, then that will be articulated in the plan in a headline delivery policy.

<b>Policy S26 Natural Environment</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 4	4	0	2	2
Policy: 29	30	7	11	12
Representation numbers				
2201 (EA), 2731 (SWT), 1468 (Natural England), 2425 (South Downs National Park), 2719, 1017, 575, 2209, 2463 (Southbourne PC), 2731 (SWT), 2006 (RSPB), 2481 (Fishbourne PC), 2397 (South Downs National Park), 1815, 3252 (WSCC Estates), 2549 (CHC), 2640, 1966, 1870, 2122, 2209, 194, 192, 2549 (Chichester Harbour Trust), 1966, 371, 2944 (CPRE Sussex), 2006, 2500, 1017, 2944, 1952, 1870, 2122, 1017, 1852, 192, 542, 2500, 1262 (North Mundham PC), 2209, 194, 902, 1201, 3171				
Summary of issues and key comments raised by residents and other respondents				
Support in principle: ( <b>Fishbourne PC, South Downs National Park, WSCC (Estates), RSPB</b> )				
Impact on designations: <ul style="list-style-type: none"> <li>• Include reference to Chichester Harbour AONB and South Downs National Park and other specific designations within the policy and supporting text (<b>Natural England, South Downs National Park CPRE Sussex</b>)</li> <li>• Suggest re-instating the natural Environment Strategy that exists in the adopted Local Plan (<b>Southbourne PC</b>)</li> </ul>				
Impact on biodiversity: <ul style="list-style-type: none"> <li>• Ensure policy wording includes commitment to deliver net gains in biodiversity</li> </ul>				
Impact from development <ul style="list-style-type: none"> <li>• Impact on shoreline footpaths from increased public use should be considered</li> <li>• Ensure the principles in the AONB Management Plan are applied to new developments. (<b>Chidham &amp; Hambrook PC</b>)</li> <li>• Consideration of brownfield sites as a priority</li> </ul>				
Future resilience: <ul style="list-style-type: none"> <li>• Consideration for the future impact on the natural environment of sea level rise and climate change.</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
Overall it is considered the representations received provide support for the aims of the policy but reflect concerns that it could be stronger. Other draft policies, including DM28 Natural Environment and DM29 Biodiversity are relevant and it is consider that the policy and supporting text could better reflect national planning policy and guidance. Other amendments to this policy will be considered to ensure it reflects the whole plan approach to the natural environment.				

<b>Policy S27 Flood Risk Management</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 1	1	0	0	1
Policy: 22	22	5	5	12
Representation numbers				
86 (Marine Management Organisation), 797, 844, 1218, 1471 (Natural England), 1904, 2110 and 2111 (WSCC), 2204 (Environment Agency), 2298 (Portsmouth Water), 2471 (Southbourne PC), 2550 (Chichester Harbour Trust), 2533 (Sidlesham PC), 2550 (Chichester Harbour Trust), 2561, 2759, 3172				
Summary of issues and key comments raised by residents and other respondents				
Coastal erosion and protection				
<ul style="list-style-type: none"> <li>• Policy pre-text should include further reference to erosion with development being restricted in areas at risk of erosion as well as flooding (<b>WSCC</b>)</li> <li>• Strategic policy should also refer to coastal protection policy and guidance (<b>Chichester Harbour Trust</b>)</li> </ul>				
Shoreline management plans:				
<ul style="list-style-type: none"> <li>• Policy pre-text should include reference to development taking account of SMPs (<b>WSCC</b>)</li> <li>• especially the CHC guidance on shoreline defences in Chi Harbour AONB (<b>Chichester Harbour Trust</b>)</li> </ul>				
South Marine Plan:				
<ul style="list-style-type: none"> <li>• Plan area lies within SMP Area – for LP to be sound, needs to be clear inclusion of marine planning to comply with NPPF para 166 and Marine and Coastal Access Act 58(1) (3), also referred to in PAS soundness self-assessment checklist. Suggest reference made specifically to legal duty to co-operate with the Marine Management Organisation as well as reference to the South Marine Plan policies and fact that any works undertaken in development of flood risk management may require a marine licence (<b>Marine Management Organisation</b>)</li> </ul>				
Sequential approach:				
<ul style="list-style-type: none"> <li>• should be clearly stated that a sequential approach must take into consideration all forms of flooding (<b>WSCC</b>)</li> <li>• Development will only be approved when the sequential and exception tests referred to at 1b in the policy are satisfied in accordance with NPPF paras 157-8 (<b>Environment Agency</b>)</li> </ul>				
SuDs				
<ul style="list-style-type: none"> <li>• Should be designed into the landscape of all new development, included as part of a District wide approach to improve water quality and provide flood mitigation (<b>WSCC</b>)</li> <li>• State need for caution when using infiltration systems (especially deep bore systems) particularly when development site is in or close to a source protection zone</li> <li>• Responsibility of water generated by developers should not be limited to development site - incorporate into planning agreements with drainage infrastructure costs for taking water to sea or main river recognised at site evaluation stage (<b>Sidlesham PC</b>)</li> <li>• Pre-text should refer to WSCC Policy document for the Management of Surface Water before seeking further advice from the LLFA if necessary (para 5.58) - provide link also (<b>WSCC</b>)</li> <li>• Suggest using risk index method in CIRIA SuDS Manual to identify risk of pollutants and SuDS measures to mitigate risk – change paragraph 2 and add at end of last sentence “and the SuDS should be designed to minimise water quality impacts (<b>Natural England</b>)</li> </ul>				

<p>Groundwater protection:</p> <ul style="list-style-type: none"> <li>• Need for caution when using infiltration systems when development site is in or close to a source protection zone (<b>Portsmouth Water</b>)</li> <li>• Insert in policy presumption against development where foundations/piling for development is likely to intercept natural underground drainage routes to sea</li> </ul>
<p>Management arrangements and funding for ongoing maintenance:</p> <ul style="list-style-type: none"> <li>• Policy should require proposals for the lifetime of the development with planning conditions/ obligations used to secure arrangements (<b>WSCC</b>)</li> </ul>
<p>Climate change and impact of sea level rises:</p> <ul style="list-style-type: none"> <li>• Insert reference in pre-text and policy to the Council prioritising the Plan area becoming carbon neutral by 2030</li> <li>• Concern regarding lifespan of new infrastructure built in flood zones especially expense of trunk road improvements and large housing schemes given high probability of flooding due to sea level rises. Suggest new development proposals on or below 5 metre elevation contour line be assessed in terms of likelihood and effects of sea level rises</li> <li>• Concern predicted sea level rises would exacerbate flood impact of a 1 in 100 year event (as referred to at point 4 of policy) if coinciding with storm surges/ high winds</li> </ul>
<p>Brownfield run off rates matching those on greenfield sites:</p> <ul style="list-style-type: none"> <li>• Impossible to achieve in many cases – where a development cannot deliver greenfield run off rates, suggest proposed development on brownfield sites should reduce run off rates, as far as practicable, below the existing run off rates for that site</li> </ul>
<p>Flood conditions:</p> <ul style="list-style-type: none"> <li>• Storm discharge and capacity of WWTW to cope with excess run off in flood conditions should be referred to in policy pre-text (<b>Chichester Harbour Trust</b>)</li> </ul>
<p>Manhood Peninsula:</p> <ul style="list-style-type: none"> <li>• Specific reference should be made to flood risk implications for Peninsula, its future constraints on development and effects on the economy and resilience of communities (<b>Sidlesham PC</b>)</li> <li>• Soakaway drainage ineffective in The Peninsula, integrated networks utilising existing ditch systems and augmenting these with attenuation areas with clear outlets to sea developed and maintained should be specifically suggested for the Peninsula (<b>Sidlesham PC</b>)</li> <li>• Seek inclusion of regional policy framework for flood risk and shoreline management (the Solent Shoreline Management Plan) and the aspiration to create new guidance for East Head to Emsworth</li> </ul>
<p>Blue/Green Infrastructure:</p> <ul style="list-style-type: none"> <li>• Encourage use of green/blue infrastructure to mitigate flood risk ie; reed banks, areas designated for wildlife can form natural flood defences (<b>Southbourne PC</b>)</li> </ul>
<p>Need for strategic policy:</p> <ul style="list-style-type: none"> <li>• Duplications/inconsistencies between strategic and DM policy (<b>Environment Agency</b>)</li> <li>• Point 3 of policy should be in DM policy instead (<b>Environment Agency</b>)</li> <li>• Point 4 of policy should be removed – suggests development with certain level of flood risk would be approved (<b>Environment Agency</b>)</li> </ul>
<p>Reducing flood risk for existing communities</p> <ul style="list-style-type: none"> <li>• Require development to achieve a reduction in flood risk for existing communities on and off the development site (<b>Environment Agency</b>)</li> </ul>
<p>SFRA:</p> <ul style="list-style-type: none"> <li>• Assessment limited to effects of climate change on rainfall and fluvial discharge. Assessment of implications of sea level rise on coastal communities and developments along coastal inlets should be made</li> </ul>

Initial Council response to issues raised and way forward for the Local Plan Review

A number of points have been raised with regards to the context and purpose of this policy. It is considered that the supporting text and introduction needs to be reworked to give greater clarity and due recognition of a number of related elements, to include erosion and shoreline management plans; the south marine plan, and give greater prominence to the role of the sequential approach.

Further description of the role of West Sussex County Council as Lead Local Flood Authority would improve the legibility and understanding of this issue.

Further consideration will need to be given to the aims and interactions between this policy and draft policy DM18: Flood Risk and Water Management to ensure the roles and purposes of each are clear.

Some of the detailed points raised regarding issues of the operation of SuDS on the Manhood Peninsula require further consideration, and if appropriate should be reflected in policy DM18 or supporting text.

An update to the Strategic Flood Risk Assessment and Stage 2 report is being commissioned to provide additional evidence to inform the next iteration of the plan.

<b>Policy S28 Pollution</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 2	2	0	2	0
Policy: 29	30	5	14	11
Representation numbers				
234, 373, 467, 515, 574, 630, 710, 737, 773, 798, 857, 873, 1068, 1089, 1328, 1376, 1694, 1817, 1865, 1873, 1957, 2004, 2388, 2472 (Southbourne Parish Council), 2483 (Fishbourne Parish Council), 2551, 2573 (Earnley Parish Council), 2642, 3078 (Chichester Harbour Conservancy), 3173, 3254 (WSCC (Estates)), 3455.				
Summary of issues and key comments raised by residents and other respondents				
Support for Policy ( <b>WSCC Estates</b> )				
Types of pollution <ul style="list-style-type: none"> <li>Weak policy - need to recognise different forms of pollution and include more detail on how to address these. Include reference to Policies DM 23, 24 and 25. (<b>Southbourne Parish Council</b>)</li> <li>Identify mitigation and acceptable level for each pollutant.</li> <li>Policy should recognise 3 designated Dark Skies Discovery Zones within the District (in the AONB) and introduce measures to protect these.</li> </ul>				
Stockbridge <ul style="list-style-type: none"> <li>How is congestion going to be improved, particularly in summer?</li> <li>Ignores pollution already outside appropriate guidelines; Stockbridge AQMA has been above the maximum allowed NO2 measure for over 6 years. Serious health implications for residents.</li> </ul>				
Air pollution <ul style="list-style-type: none"> <li>Not detailed enough. More monitoring and more measures included in this policy to ensure actions are taken.</li> <li>Encourage measures to improve air quality and residents' health; be more attractive to visitors and tourists.</li> <li>Pollution assessment of any changes to the A27 with particular regard to pollution by particulate matter must be taken into consideration.</li> <li>CDC needs to do more to limit pollution caused by vehicles. Suggestions include; Clean air zones, Cleaner/electric buses, Car free days, Work place parking levies, Anti-idling zones, Increased pedestrianised areas in villages and towns, Safe cycle routes/better network, More electric car charging points, Use of bus lanes, Car sharing schemes for commuters, Use of the car club, Park and Ride schemes</li> </ul>				
Traffic as cause of air pollution <ul style="list-style-type: none"> <li>Fails to acknowledge traffic is major cause of pollution and new transport routes likely to add to problem. Impact on health.</li> <li>B2145 already has very high traffic levels; proposed development will lead to significant increase in traffic and pollution.</li> <li>Increase in air/noise/pollution associated with building of link road.</li> <li>Already have 3 AQMA zones, more robust measures needed to counter private cars running on diesel and petrol.</li> <li>EU Regulations already breached; air quality will worsen as result of traffic from developments feeding onto the A27. Section does not cover noise or light pollution. (<b>Fishbourne Parish Council</b>)</li> </ul>				
Impact of new development				

- Air and light pollution from developments need mitigation. Already high pollution levels to get worse with new development.
- Protection from pollution needed; housing, roads, industry should follow that. No mention of climate change and possible detrimental effects.
- Policy committing Council to "...require that the impacts are minimised and/or mitigated to an acceptable level" not good enough - be more specific.

Transport Study

- No significant deterioration of air quality recognised in transport study in relation to new commercial development. **(Earnley Parish Council)**

Initial Council response to issues raised and way forward for the Local Plan Review

This draft strategic policy sets the general aims. However, the comments raised here highlight that insufficient clarity is given to subsequent policies in the plan DM23 Lighting, DM24: Air Quality; DM25: Noise, and DM26: Contaminated Land. The policy and supporting text needs to be expanded to justify its inclusion in the plan.

<b>Policy S29 Green Infrastructure</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 4	4	1	1	2
Policy: 13	13	8	0	5
Representation numbers				
868, 2948, 2732 (Sussex Wildlife Trust), 2205 (Environment Agency), 3174, 2748 (Gleeson Strategic Land), 244 (Sustrans), 1872, 2112 (West Sussex County Council), 740, 2389, 1819, 3255 (WSCC Estates), 2552 (Chichester Harbour Trust), 2643 (Barton Willmore), 2464 (Southbourne Parish Council), 3079 (Chichester Harbour Conservancy)				
Summary of issues and key comments raised by residents and other respondents				
Support in principle ( <b>West Sussex County Council, Environment Agency, Barton Willmore, WSCC Estates</b> )				
Local Green Spaces: <ul style="list-style-type: none"> <li>Add reference to Local Green Spaces</li> </ul>				
Blue infrastructure: <ul style="list-style-type: none"> <li>Needs defining</li> <li>Inconsistently represented through plan (<b>Sussex Wildlife Trust</b>)</li> </ul>				
New GI proposals: <ul style="list-style-type: none"> <li>Concerned why new GI only proposed at selected strategic sites (<b>Sussex Wildlife Trust</b>)</li> <li>Should be provided where there is accessibility for pedestrians, cyclists and horse riders (<b>Sustrans</b>)</li> <li>Policies map shows no new GI which is an opportunity missed</li> <li>Recommend measures are put in place to secure long term management of GI at strategic sites (<b>West Sussex County Council</b>)</li> </ul>				
Policy wording: <ul style="list-style-type: none"> <li>Include reference to climate change</li> <li>Include reference to greenways</li> <li>Include reference to recreational disturbance (<b>Chichester Harbour Conservancy</b>)</li> <li>Expand in relation to creation of GI links between AONB and South Downs National Park (<b>Chichester Harbour Trust</b>)</li> <li>Agree with inclusion of private gardens and allotments as functional parts of GI (<b>Gleeson Strategic Land</b>)</li> </ul>				
Renewable energy: <ul style="list-style-type: none"> <li>New houses should be forced to instigate green policies such as renewable energy as standard</li> </ul>				
Wildlife: <ul style="list-style-type: none"> <li>Need to recognise conflict of interest between GI for human use and that intended to protect habitats which may require restrictions on human use (<b>Southbourne Parish Council</b>)</li> <li>Plan should insist on provision of suitable sized spaces on land suitable for wildlife</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
<p>There is a need for this policy and supporting text to be developed to clearly articulate the Green Infrastructure strategy for this plan. The supporting text for draft policy DM32: Green Infrastructure contains a better articulation of the main issues.</p> <p>Draft policy DM32: Green Infrastructure makes it clear that all development will be expected to contribute towards the provision of additional green infrastructure, and the protection and enhancement of existing green infrastructure.</p>				

<b>Policy S30 Strategic Wildlife Corridors</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 15	15	6	5	4
Policy: 64	72	28	22	22
Representation numbers				
2435 (South Downs National Park Authority), 347, 2113, 2206 (Environment Agency), 2465 (Southbourne Parish Council), 2950, 579, 2041 (Sussex Ornithological Society), 799, 97, 566, 2475 (Fishbourne Neighbourhood Plan Group), 3080 (Chichester Harbour Conservancy), 2434 (South Downs National Park Authority), 750, 2115 (West Sussex County Council), 3507 (Chichester Harbour Conservancy), 2945 (CPRE Sussex), 1788 (Harbour Villages Lib Dem Campaign Team), 1361, 36, 992, 3175, 1422, 2484 (Fishbourne Parish Council), 2581 (Lavant Parish Council), 3169, 524, 1571, 2526, 2261, 2498 (Chidham and Hambrook Parish Council), 3128, 2569 (Chichester Wildfowlers' Association), 2553 (Chichester Harbour Trust), 1392, 2390, 1820, 3284 (Westbourne Parish Council), 2733 (Sussex Wildlife Trust), 572, 2565 (Friends of Pagham Harbour), 105, 1090, 1835, 1333 (Manhood Wildlife and Heritage Group), 442, 640, 1069, 1960, 534, 3224 (Henry Adams obo The Feltham Family), 3229 (Henry Adams obo The Smith Family), 3261 (Henry Adams obo WSCC Estates), 1199, 1992, 1263 (North Mundham Parish Council), 865, 188 (Friends of Brandy Hole Copse), 2749 (Gleeson Strategic Land), 1497 (Natural England), 201, 2531 (Sidlesham Parish Council), 1823, 1822, 464, 1566, 1576, 1868, 2236, 782, 2114, 3502, 2576 (Earnley Parish Council), 1700, 1579, 204, 236, 3134, 1323, 449, 445, 3527 (West Wittering Parish Council), 463, 53, 2189				
Summary of issues and key comments raised by residents and other respondents				
Support in principle <b>(Harbour Villages Lib Dem Campaign Team, Fishbourne Parish Council, Lavant Parish Council, Sussex Ornithological Society, CPRE Sussex, Chidham and Hambrook Parish Council, Chichester Wildfowlers' Association, Chichester Harbour Trust, Westbourne Parish Council, Sussex Wildlife Trust, Environment Agency, South Downs National Park Authority, Friends of Pagham Harbour, Southbourne Parish Council, Manhood Wildlife and Heritage Group, West Sussex County Council, Earnley Parish Council, Chichester Harbour Conservancy, )</b>				
Object <b>(Henry Adams obo The Feltham Family, The Smith Family and WSCC Estates)</b>				
Comments on policy wording, supporting text and background paper <b>(Environment Agency, Southbourne Parish Council, West Sussex County Council)</b>				
Suggested amendments to corridors <b>(Friends of Brandy Hole Copse, Gleeson Strategic Land, Natural England, Sidlesham Parish Council, CPRE Sussex, Earnley Parish Council, Chidham and Hambrook Parish Council, Chichester Harbour Conservancy, Friends of Pagham Harbour, Southbourne Parish Council, Manhood Wildlife and Heritage Group, West Sussex County Council, Sussex Ornithological Society, Sussex Wildlife Trust)</b>				
Corridors could be improved: <ul style="list-style-type: none"> <li>• Narrow in places – question effectiveness <b>(Sussex Ornithological Society, South Downs National Park Authority)</b></li> <li>• No corresponding policies in neighbouring authorities plans <b>(South Downs National Park Authority)</b></li> <li>• Corridors should link all SPAs including Pagham Harbour and Medmerry</li> <li>• Should be explored with conservation bodies to identify any other areas to be included <b>(West Sussex County Council)</b></li> </ul>				
Fishbourne: <ul style="list-style-type: none"> <li>• Suggest corridor be moved to west of Fishbourne <b>(Harbour Villages Lib Dem Campaign Team, Fishbourne Parish Council, Fishbourne Neighbourhood Plan</b></li> </ul>				

<p><b>Group)</b></p> <ul style="list-style-type: none"> <li>• Current location of corridor limits ability of Fishbourne Parish Council to undertake appropriate assessment of sites (<b>Henry Adams obo The Feltham Family, The Smith Family and WSCC Estates</b>)</li> </ul>
<p>Development within corridors:</p> <ul style="list-style-type: none"> <li>• Need to control what constitutes ‘minor development’</li> <li>• Do not see how any development should be permitted in the corridors (except for satisfying criterion 3) (<b>Sussex Ornithological Society</b>)</li> <li>• Sensitively designed development could be brought forward within corridors (<b>Gleeson Strategic Land</b>)</li> </ul>
<p>Conflict with northern bypass:</p> <ul style="list-style-type: none"> <li>• Ensure policy does not preclude possibility of a northern bypass (<b>West Wittering Parish Council, Earnley Parish Council, West Sussex County Council</b>)</li> </ul>
<p><b>Initial Council response to issues raised and way forward for the Local Plan Review</b></p>
<p>Whilst there is a level of support for this draft policy, a number of objections and suggestions for amending the policy have been received. Further evidence of species and areas of habitat is being gathered which will inform the development of this policy going forward. Comments received on the background evidence will be considered further to determine if any refinements to the methodology are appropriate.</p> <p>The sequential approach set out in this policy seeks to provide a balance between the aims of the policy and not preventing other critical proposals coming forward. This includes for example, any future consideration of proposals for a northern bypass that may be forthcoming.</p> <p>The implications of the proposed wildlife corridor to the east of Fishbourne are noted. At present, the evidence strongly indicates that the proposed corridor to the east of Fishbourne provides the best opportunity for improving wildlife links, as this location has the highest concentration of areas of habitat. The location of the proposed corridors will continue to be considered as additional evidence is received.</p>

<b>Policy S31 Wastewater Management and Water Quality</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 4	4	0	2	4
Policy: 25	27	5	9	22
Representation numbers				
87 (Marine Management Organisation), 320, 330, 374, 907, 1002 ( Birdham PC), 1264 (N Mundham PC), 1354, 1459, 1507 (Natural England), 1789 ( Harbour Villages Lib Dem Campaign Team ), 1965, 2117 (WSCC as LLFA), 2119 (WSCC as LLFA) , 2207 (Environment Agency), 2299 (Portsmouth Water) 2325 (Southern Water), 2391, 2451 (Southbourne PC), 2452 (Southbourne PC) 2485 (Fishbourne PC), 2512 (Bosham PC), 2534 (Sidlesham Parish Council), 2554 (Chichester Harbour Trust) , 2566, 2644, 2734 (Sussex Wildlife Trust), 2951, 3082 ( Chichester Harbour Conservancy) , 3256 (WSCC Estates) ,3497				
Summary of issues and key comments raised by residents and other respondents				
Support higher water efficiency measures to reduce flow, noting water company aspirations to reduce to 100lppd ( <b>Portsmouth Water, Southern Water</b> )				
Concern about the capacity of waste water treatment works ( <b>Chichester Harbour Trust, Sidlesham Parish Council, WSCC, Southbourne PC</b> )				
<ul style="list-style-type: none"> <li>• Need to set out a clear strategy for the pattern, scale and design of development in relation to arrangements for dealing with waste water (<b>West Sussex County Council as Lead Local Flood Authority</b>)</li> <li>• Detailed concerns about the Water Quality Study published alongside the Preferred Approach, particularly in relation to capacity at Thornham (<b>Southbourne Parish Council</b>)</li> <li>• Need to ensure required upgrades are in place ahead of development (<b>Bosham PC, Fishbourne PC, Southern Water</b>)</li> <li>• Southern Water should develop a regional waste water treatment solution and address groundwater infiltration (some detailed suggestions offered)</li> <li>• Concern about storm discharges and impact on water quality (<b>Chichester Harbour Trust</b>)</li> <li>• Concern about horticultural water use (<b>N Mundham PC</b>)</li> </ul>				
Need a nutrient neutral policy and management plan for Chichester Harbour ( <b>Natural England, Chichester Harbour Conservancy, Chichester Harbour Trust</b> )				
Various wording changes suggested including				
<ul style="list-style-type: none"> <li>• Detailed wording suggestions provided to clarify scope and ensure no adverse effect on Chichester Harbour (Natural England)</li> <li>• Policy should be broadened to cover wider water quality and water resources within the plan area – examples of good policies elsewhere given (<b>Environment Agency</b>)</li> <li>• Need to address specific issues at Apuldram WWTW (<b>Environment Agency</b>)</li> <li>• Additional wording relating to capacity (<b>Southbourne PC</b>)</li> <li>• Need to refer to the South Marine Plan (<b>Marine Management Organisation</b>)</li> <li>• Policy needs to apply to industrial scale horticultural developments in Chichester and Pagham Harbour catchments</li> </ul>				
Other				
<ul style="list-style-type: none"> <li>• Surface Water and Foul Drainage SPD should be strengthened (<b>Southbourne PC</b>)</li> <li>• Need to set water consumption standards for horticulture (<b>Sussex Wildlife Trust</b>)</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
Comments and concerns relating to the Water Quality Assessment evidence study are				

noted. The Council is undertaking a review of the evidence, focusing on the key elements necessary to inform the approach in the Local Plan review, and the findings will be published in support of the emerging Plan. The plan will be informed by that assessment, and any implications in the timing and need for additional waste water infrastructure will be reflected in the final development strategy.

The detailed policy working suggestions are noted and the policy will be reviewed to incorporate appropriate amendments.

The concerns regarding the issue of nitrates in Chichester Harbour are noted. The Council is working with Natural England and others in developing an appropriate strategy to address the issue with will be reflected in the next iteration of the local plan.

<b>Policy S32 Design Strategies for Strategic and Major Development Sites</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 1	1	0	1	0
Policy: 27	28	11	2	15
Representation numbers				
3543, 3257 (WSCC Estates), 3182, 3085 (Chichester Harbour Conservancy), 2952, 2946 (CPRE Sussex), 2893 (Bloor Homes Southern), 2736 (Sussex Wildlife Trust), 2645 (Barton Willmore), 2555 (Chichester Harbour Trust), 2412 (SDNPA), 2392, 2354 (West Sussex Local Access Forum), 2258 (Historic England), 2208 (Environment Agency), 2020 (Sport England), 1725 (Heaver Homes Ltd), 1520 (Natural England), 1305 (Bosham Football Club), 1265 (North Mundham PC), 1134 (British Horse Society), 800, 331, 651, 504, 548, 558 (Sustrans), 590, 592				
Summary of issues and key comments raised by residents and other respondents				
Support policy: <b>(WSCC Estates, Chichester Harbour Conservancy, Bloor Homes Southern, Barton Willmore, Chichester Harbour Trust, West Sussex Local Access Forum, Historic England, Environment Agency, British Horse Society, Sustrans</b>				
Need high standard of sustainable development (e.g. at Southern Gateway)				
Walking, cycling and bridleways: <ul style="list-style-type: none"> <li>• Encourage maximising existing and new movement connections,</li> <li>• Encourage walking and cycling</li> <li>• New routes linked to wider PRoW, bridleways and access networks <b>(West Sussex Local Access Forum, British Horse Society)</b></li> </ul>				
Amendments to text: <ul style="list-style-type: none"> <li>• Reference to self-build and custom build should be included</li> <li>• Masterplans should include phasing strategy to demonstrate delivery</li> <li>• Need reference to biodiversity <b>(Sussex Wildlife Trust)</b></li> <li>• Modern architectural sustainable design</li> </ul>				
Open space and playing fields: <ul style="list-style-type: none"> <li>• Loss of playing field or prejudice of playing field (eg housing next to playing field) would be resisted <b>(Sport England)</b></li> </ul>				
Masterplans: <ul style="list-style-type: none"> <li>• Encourage early, proactive consultation with community <b>(CPRE Sussex)</b></li> <li>• Encourage masterplans before applications <b>(SDNPA)</b></li> <li>• Note they are not to be adopted therefore can reviewed; need to take pragmatic approach to responding to market <b>(Heaver Homes Ltd)</b></li> <li>• Should be informed by Landscape and Visual Impact Assessment <b>(Natural England)</b></li> <li>• Need to address detail of needs and data</li> <li>• Archaeological assessments required for all strategic sites</li> </ul>				
Identification of strategic sites should look back at 'unconstrained list' of sites considered in previous plans.				
Settlements will lose their identity and turn into sizeable towns. <b>(North Mundham PC)</b>				
Initial Council response to issues raised and way forward for the Local Plan Review				
It is considered that the criteria in the draft policy address most of the main points including many of the suggestions made in the representations. However, the expectations for community engagement and the role of Landscape Visual Impact Assessments could usefully be included in the policy and supporting text.				

<b>Policy AL1 Land West of Chichester</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 5	6	0	4	2
Policy: 30	34	3	11	20
Representation numbers				
32, 120, 122, 147, 246 (Sustrans), 269, 332, 472, 593, 701, 803, 917, 918, 1135, 1362, 1518, 1521 (Natural England), 1704, 1707, 1710, 1711, 1830, 2029, 2120 (West Sussex County Council), 2136 (West Sussex County Council), 2190, 2259 (Historic England), 2300 (Portsmouth Water Ltd), 2329 (Southern Water), 2355, 2394, 2414 (South Downs National Park Authority), 2737, 2922, 2953, 2972, 3086, 3129, 3176, 3177.				
Summary of issues and key comments raised by residents and other respondents				
Scheduled Monument				
<ul style="list-style-type: none"> <li>Support exclusion of scheduled monument. <b>(Historic England)</b></li> </ul>				
Clarification of site areas				
<ul style="list-style-type: none"> <li>Paragraph 6.10 – employment space = 6ha / 60,000 sq.m. Paragraph 4.112 – employment space = 6ha but in parentheses 36,000 sq.m. = 3.6 ha.</li> </ul>				
Settlement boundary				
<ul style="list-style-type: none"> <li>Text should state that AONB is just 200m from settlement boundary.</li> <li>Extend settlement boundary north to accommodate unmet housing need as affordable exemption site within 5 miles of the need as required in statute.</li> </ul>				
Land north of B2178				
<ul style="list-style-type: none"> <li>Object to land north of B2178 being included in allocation. Potential car parking, visitor centre etc would damage rural setting and view of cathedral spire.</li> <li>Text should reflect desire to limit impact of development on the lanes to north of B2178. Previous intention to partially close Brandy Hole Lane not mentioned.</li> </ul>				
Site Access				
<ul style="list-style-type: none"> <li>Why was a road bridge not considered at Fishbourne Road with access to the SDL?</li> <li>No proposals for access to the A27 with this development.</li> <li>Access to the sports facilities from Clay Lane - not suitable for extra traffic. Access point changed from original plans.</li> <li>Access from the south should be from Cathedral Way, not Westgate - no capacity.</li> <li>No mention of detailed traffic infrastructure for southern end of development with 2nd phase. No spare capacity; all traffic will have to use St Pauls Rd/ Sherborne road.</li> <li>Southern access route will cause disruption for greener modes of travel.</li> </ul>				
Sustainable transport links				
<ul style="list-style-type: none"> <li>Paragraph 6.8 includes "offers good accessibility" whereas paragraph 12.29 of the adopted Local Plan refers to good "potential" accessibility, which is accurate.</li> <li>Cycle and bus lanes included from outset to ensure sustainable travel choices.</li> </ul>				
Walking & Cycle routes				
<ul style="list-style-type: none"> <li>Provide improved cycle routes between Fishbourne and North of City.</li> <li>Safe crossing needed at junction of Sherborne Rd., St. Paul's Rd., and Norwich Rd.</li> <li>Retain existing Centurion Way as a strategic cycle and walking route. <b>(Sustrans)</b></li> <li>Developer's provision inadequate and does not comply with current local plan.</li> <li>Walking and cycling safely as important as car access.</li> <li>Paragraph 10 - opportunity here to provide a multi-user PRoW for all NMUs.</li> </ul>				
Flooding				

<ul style="list-style-type: none"> <li>• Para. 6.12 - dispute no major issue with flood risk; chalk stream runs north-south to east of site providing specialist river habitat.</li> <li>• Add to policy - Increase capacity to attenuate surface water on site, thereby reducing the discharge flows off the site below current rates and reducing the risk of flooding to residential areas downstream. <b>(WSCC)</b></li> </ul>
<p>Green Infrastructure</p> <ul style="list-style-type: none"> <li>• Point 4 - development provides opportunity to improve links to the wider countryside.</li> <li>• Refer to green infrastructure contribution of extension of Centurion Way to Midhurst.</li> </ul>
<p>WWTW</p> <ul style="list-style-type: none"> <li>• Update regarding WWTW - Connection and pipeline being delivered by Southern Water. Outline permission allows for connection to Tangmere facility, also for onsite foul drainage facility.</li> <li>• Existing provision WWTW supported. Approach adjusted following OFWAT changes from April 2018. Need to work with site promoters to review whether delivery of new infrastructure aligns with occupation of the development. <b>(Southern Water)</b></li> </ul>
<p>Water supply</p> <ul style="list-style-type: none"> <li>• Assume that site has sewerage pumped to Tangmere and water supplied by us. Portsmouth Water provided provisional designs for this system. On site mains are likely to be provided by a third party. <b>(Portsmouth Water)</b></li> </ul>
<p>Education</p> <ul style="list-style-type: none"> <li>• Potentially no school built until 2029. School must go in first.</li> <li>• Phase 1 to provide primary school - 2FE school and 1FE teaching accommodation. Phase 2 to include expansion - 1FE of teaching accommodation. <b>(West Sussex County Council)</b></li> </ul>
<p>Aldingbourne Rife</p> <ul style="list-style-type: none"> <li>• Why is Aldingbourne Rife being allowed to deteriorate?</li> </ul>
<p>Biodiversity &amp; SPA</p> <ul style="list-style-type: none"> <li>• Para 6.14 – add 'mitigation' in relation to protecting nearby SPA.</li> <li>• Welcome protection of named sites; suggest possible enhancements (net gain).</li> <li>• Welcome recognition of the need for mitigation in relation to SPAs.</li> <li>• Support biodiversity and landscape clauses, however recommend wording change to clause 14. <b>(Natural England)</b></li> <li>• Concern no recognition of net gains to biodiversity.</li> </ul>
<p>Centurion Way</p> <ul style="list-style-type: none"> <li>• No reference to Centurion way for recreation disturbance.</li> <li>• Centurion Way protects and enhances biodiversity - Provides wildlife corridor between SDNP and Chichester Harbour.</li> <li>• Include use by equestrians when upgrading to a multi-user path.</li> <li>• Emphasise point 10, state development must not adversely affect, and preferably enhance usability of, Centurion Way connecting Chichester with the SDNP. <b>(SDNPA)</b></li> </ul>
<p>Other</p> <ul style="list-style-type: none"> <li>• Update to minimum 1600 homes to allow flexibility. Changes in density may allow up to 1750 dwellings.</li> </ul>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p> <p>The principle of development of the site is established in Policy 15 of the adopted Local Plan. The site is also the subject of a two-phase Framework Plan approved by Planning Committee in April 2016.</p> <p>The specific and cumulative infrastructure impacts, including any implications for the timing</p>

of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.

The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

<b>Policy AL2 Land at Shopwyke</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 3	3	0	1	2
Policy: 16	16	1	4	11
Representation numbers				
247 (Sustrans), 270, 333, 353, 805, 971, 1136, 1645, 2137 (West Sussex County Council), 2260 (Historic England), 2302 (Portsmouth Water Ltd), 2330 (Southern Water), 2356, 2396, 2739, 2908, 2954, 3049, 3178.				
Summary of issues and key comments raised by residents and other respondents				
Cycle track provision				
<ul style="list-style-type: none"> <li>• Para 6.19, add "Cycle provision will be expected to be fully compliant with all relevant aspects of current Local Transport Notes and, where doubt exists about compliance, developers may be asked to submit an independent cycle audit"</li> <li>• Para 6.20, change to "and a new bridge, built to shared foot and cycle bridge standards, across the A27 via Coach Road to Westhampnett village"</li> <li>• Proposals for cycle tracks/bridges at Portfield and Shopwyke at expense of existing e route from Tangmere to Chichester. If bridge provided at Portfield roundabout, clarification required of location of cycle route on western side.</li> <li>• Sustainable travel links to support WSCC Walking and Cycling Strategy 2016-2026</li> </ul>				
Bridge provision				
<ul style="list-style-type: none"> <li>• Concern pedestrians/cyclists will be forced to wait until fixed number of houses built. Change penultimate paragraph of policy to "Development of the site will be dependent on provision of bridges providing access out the site....."</li> <li>• Concern equestrian access not provided for – suggest reference to bridge at point 9 includes all NMUs ie; "foot/cycle/ equestrian access across bridge" (<b>WSCC</b>)</li> <li>• Bridge off-putting to a section of walkers, cyclists, and section of the disabled.</li> <li>• Support provision for foot/cycle bridge (<b>Sustrans</b>)</li> </ul>				
Allocation				
<ul style="list-style-type: none"> <li>• Development could be enhanced with approved Masterplan and Committee adopted Design Code/Regulatory Plan for site and incorporate further 100 dwellings on site.</li> <li>• Suggest 0.48ha employment land could be suitable for other forms of employment to complement neighbouring 3.52ha of employment.</li> <li>• Further allocation will alter character of Oving</li> </ul>				
Biodiversity and Green Infrastructure				
<ul style="list-style-type: none"> <li>• Policy too soft in relation to enhancing biodiversity and green infrastructure.</li> <li>• Amend Point 4 to read: "Open space and green infrastructure, with the enhancement of the existing lakes to deliver biodiversity net gains and safer access".</li> <li>• Point 5 – insert "sustainable" before the word "access".</li> <li>• Amend Point 6 - "Provide integrated green infrastructure.....";</li> <li>• Point 12 – word "mitigate" change to "avoid".</li> <li>• Penultimate paragraph, add "before any dwellings are occupied" at end of sentence</li> <li>• Lake provides opportunity for linking with habitats east of Chichester. In addition to the proposed wildlife corridor and focussed on the River Lavant Flood Alleviation Channel.</li> </ul>				
Transport access/infrastructure				

<ul style="list-style-type: none"> <li>• Concern re; effect of new development on high traffic levels in area</li> <li>• Concern reference to transport infrastructure limited to acoustic screening of noise from A27</li> <li>• Transport access at Bognor roundabout and Oving traffic lights</li> <li>• Make provision for regular bus services linking the site with Chichester City centre.</li> </ul>
<p>Wastewater Treatment/Supply</p> <ul style="list-style-type: none"> <li>• Need to work with site promoters to review whether delivery of new infrastructure aligns with occupation of development. Amend final para of policy to read: "Occupation of development is phased to align with the delivery of infrastructure for adequate wastewater conveyance and treatment to meet strict environmental standards" <b>(Southern Water)</b></li> <li>• Already under construction and has a conventional water supply system with all elements provided by us. <b>(Portsmouth Water Ltd)</b></li> </ul>
<p>Historic buildings</p> <ul style="list-style-type: none"> <li>• Amend Point 7 to reflect NPPF para 194 to include Grade II listed Shopwyke Grange: "Protect existing views of Chichester Cathedral spire and conserve and enhance the historic significance of the listed barn at Greenway Farm, the listed Shopwyke Grange and the cluster of buildings associated with the grade II* listed Shopwhyke Hall which should be analysed at an early stage of the masterplan" <b>(Historic England)</b></li> </ul>
<p>Community Facilities/Safety</p> <ul style="list-style-type: none"> <li>• Community facilities/amenities should be planned to complement provision in allocation for East of Chichester (Oving Parish), to avoid duplication and/or competition</li> <li>• Concern proposed footbridge and crossing do not provide sufficiently safe routes to secondary and primary schools</li> </ul>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p> <p>The principle of development of the greater part of the site is established in Policy 16 of the adopted Local Plan and subsequent planning applications.</p> <p>The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.</p>

<b>Policy AL3: Land East of Chichester</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 4	4	0	2	2
Policy: 21	23	5	3	15
Representation numbers				
3223 (Genesis Town Planning obo Elberry Properties Ltd), 2955, 2474 (Sussex Wildlife Trust), 2722 (Quod obo Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd), 2683 (Savills UK obo Suez – Sita UK), 2584 (Oving Parish Council), 2357 (West Sussex Local Access Forum), 2332 (Southern Water), 2303 (Portsmouth Water), 2262 (Historic England), 2218 (Environment Agency), 2138 (WSCC), 2121 (WSCC), 2083 (WSCC), 2036 (Sussex Ornithological Society), 1654, 1523 (Natural England), 1139 (British Horse Society), 929, 809, 622, 611, 334				
Summary of issues and key comments raised by residents and other respondents				
Land Promotion:				
<ul style="list-style-type: none"> <li>• Include site at Sherwood Nursery and Lansdowne Nursery within wider strategic allocation. 3223 (<b>Genesis Town Planning obo Elberry Properties Ltd</b>)</li> <li>•</li> </ul>				
Object:				
<ul style="list-style-type: none"> <li>• Lack of certainty on housing numbers. Range from 600-1000. Unclear how such a difference in numbers can be planned for. Need true assessment of site capacity with consideration for natural capital assets (AONB, SPA). Need more ambitious requirement for green infrastructure. 2474 (<b>Sussex Wildlife Trust</b>)</li> <li>• Object if housing development is not supported by associated infrastructure and causes biodiversity/habitat fragmentation. 2584 (<b>Oving Parish Council</b>)</li> <li>• Remove strip of land along eastern boundary to provide enhanced environmental benefits.</li> </ul>				
Support:				
<ul style="list-style-type: none"> <li>• Site is brownfield, well located and can deliver housing requirement and community facilities sustainably. 2722 (<b>Quod obo Obsidian Strategic AC Limited, DC Heaver and Eurequity IC Ltd</b>), 2683 (<b>Savills UK obo Suez – Sita UK</b>)</li> <li>• Support opportunities for provision of green infrastructure links to wider countryside to comply with objectives of West Sussex Rights of Way Management Plan 2018-2028. 2357 (<b>West Sussex Local Access Forum</b>) 1139 (<b>British Horse Society</b>)</li> <li>• Support wording relating to need to demonstrate capacity within sewer network and Waste Water Treatment Works. Need to work with developers to understand development programme. 2332 (<b>Southern Water</b>)</li> <li>• Integration of community facilities to complement those provided to land at Shopwyke.</li> <li>• Maximise opportunities on this site to reduce proposed numbers elsewhere on more sensitive locations.</li> </ul>				
Wildlife:				
<ul style="list-style-type: none"> <li>• 50m buffer zone should be established around shores of Drayton Pit in which no development can take place. 2036 (<b>Sussex Ornithological Society</b>)</li> </ul>				
Policy wording:				
<ul style="list-style-type: none"> <li>• Add additional criteria to ensure occupation of development phased to align with the delivery of sewerage infrastructure in consultation with service provider. 2332 (<b>Southern Water</b>)</li> <li>• Include reference to listed Shopwyke Grange. 2262 (<b>Historic England</b>)</li> <li>• Suggest amendment to wording to include 'and capacity of the site to provide flood risk attenuation for the increased housing density'. 2138 (<b>WSCC</b>)</li> <li>• Additional wording to ensure site biodiversity protected and enhanced and that a</li> </ul>				

<p>buffer should be left around the pit in the south east of the site to minimise disturbance. Produce SUDS. 1523 (<b>Natural England</b>)</p> <ul style="list-style-type: none"> <li>• Make clear in policy the need for integration with already permitted development.</li> <li>• Replace ‘promoting’ with ‘maximising’. Sub para 4.</li> <li>• Make specific reference to education as infrastructure.</li> </ul>
<p>Comment:</p> <ul style="list-style-type: none"> <li>• No large diameter drains crossing site. Landfill may damage plastic pipes. On site mains maybe more expensive to protect to ensure water quality maintained. 2303 (<b>Portsmouth Water</b>)</li> <li>• Masterplan needs to consider area of site in Flood Zone 2 and lake. All development should be within flood zone 1. 2218 (<b>Environment Agency</b>)</li> <li>• Reference should be made to giving consideration to the Fuel Depot site allocation in the Waste Local Plan (Policy W10) and its safeguarding.</li> <li>• Consider the impact of sewage discharges on Aldingbourne Rife.</li> </ul>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p> <p>The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>The technical work to date has not concluded there is an absolute constraint to the delivery of up to 1,000 homes on the sites, but further work is necessary before the capacity of the site can be confirmed.</p> <p>The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.</p>

<b>Policy AL4 Land at Westhampnett/North East of Chichester</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 5	5	1	2	2
Policy: 23	28	6	8	14
Representation numbers				
314, 1279, 1140, 226, 248, 890, 2358, 2750 (SWT), 2333 (Southern Water), 2123 (WSCC), 335, 2139 (WSCC), 2084 (WSCC), 2415, 1718, 1714, 2264 (Historic England), 1342, 2304 (Portsmouth Water), 3521, 2415 (SDNP), 848, 1598, 1342, 2660, 1045, 1722, 1721, 2191, 3359				
Summary of issues and key comments raised by residents and other respondents				
Support <ul style="list-style-type: none"> <li>Welcome provision and reference to greenlinks to the SDNP and Chichester City (<b>WSCC</b>) (<b>SDNP</b>)</li> </ul>				
Environmental Considerations <ul style="list-style-type: none"> <li>Consider riverine habitats (<b>SWT</b>)</li> <li>Key views are from the higher ground to the north within the SDNP</li> </ul>				
Infrastructure <ul style="list-style-type: none"> <li>Phase development to align with the delivery of key infrastructure (education, wastewater, services and roads) (<b>Southern Water, WSCC</b>)</li> <li>Need to make reference to minerals safeguarding as within the sharp sand and gravel safeguarding area (<b>WSCC</b>)</li> <li>Buffer zone should be considered for employment</li> </ul>				
Alternative uses <ul style="list-style-type: none"> <li>Buffer zone should be considered for employment</li> <li>Land proposed for removal should not be removed as strategic employment site and should be included within plan as development will not be affected by noise buffer or cause additional environmental pollution</li> <li>Extend settlement to the north as exemption site for affordable housing</li> <li>Consider additional land within existing SDL boundary to east of River Lavant for residential development.</li> </ul>				
General comments <ul style="list-style-type: none"> <li>Will Lavant Valley greenspace still be secured</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
<p>This principle of development in this broad area was established in Policy 17 of the adopted Local Plan. An outline application for phase one was permitted in June 2016, to deliver 300 dwellings, open space, a community facility and children's playspace. The initial phase of built development focuses on the southern site, accessed off Stane Street and Madgwick Lane.</p> <p>The constraints affecting the site are set out in paragraph 6.35 of the Preferred Approach Plan. However, the comments regarding the potential for part of the site to accommodate additional development (including employment development) are noted, and the potential for this area will be kept under review, particularly with regards to the need and deliverability of other potential allocations.</p> <p>The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the</p>				

**Assessment.**

The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

<b>Policy AL5 – Southern Gateway</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 1	1	0	0	1
Policy: 38	41	3	19	19
Representation numbers				
129, 209, 249 (Sustrans), 271, 336, 473, 517, 522, 656 (Lavant Parish Council), 669, 721 (West Itchenor Parish Council), 816, 975, 1141, 1205, 1222, 1343, 1365, 1373, 1463, 1492, 1551, 1599, 1790, 1792, 1833, 1844, 1994, 2051 (Homes England), 2085 (WSSCC), 2124 (WSSCC), 2140 (WSSCC), 2211 (Environment Agency), 2266 (Historic England), 2305 (Portsmouth Water Ltd), 2359, 2399, 2754 (Sussex Wildlife Trust), 3135, 3180, 3341, 3489.				
Summary of issues and key comments raised by residents and other respondents				
Transport: <ul style="list-style-type: none"> <li>• Need better plans for walking and cycling; dedicated cyclepaths to be shown. National cycle routes NCN 2 [and 88] cross site; improve provision. <b>(Sustrans)</b></li> <li>• Consider alternative schemes (eg Freeflow, Gateway), improve interchange</li> <li>• £5million grant from Coast to Capital regeneration fund provides resources for mitigation of traffic congestion, noise, light, traffic pollution.</li> </ul>				
Transport – Road Use/Layout <ul style="list-style-type: none"> <li>• Take Systra BABA27 report into account to separate A27 through traffic from local traffic. No evidence provided that junction improvements adequate beyond 2035.</li> <li>• Use of narrow residential streets in city centre unwise.</li> <li>• No right turn from Terminus Road to Stockbridge Road is unhelpful.</li> <li>• Cars should not be attracted to use city centre as a n-s or e-w route. .</li> <li>• Detailed plans to be shown to residents for housing and construction traffic. All the proposed alterations at junctions are detrimental - pollution, noise.</li> <li>• Success of development depends on long term access to A27.</li> <li>• Traffic management and diverting all but buses along Basin Rd are dubious ideas</li> <li>• Detrimental to residents south of the A27 if vehicular access to City from south restricted prior to implementation of a HE scheme to relieve congestion on A27.</li> <li>• Flawed as it stands. Will disadvantage local residents, gridlock around Station, gentrification of canal. Scheme needs to be led by local Chichester residents.</li> </ul>				
Transport – Level Crossings <ul style="list-style-type: none"> <li>• Provision of bridge or underpass to allow the removal of level crossings on Stockbridge Road and Basin Road. Remove para 7 <b>(West Itchenor PC)</b></li> <li>• Needs fully integrated bus/train interchange and the closing of both level crossings with maybe a tunnel for local buses and deliveries.</li> <li>• Delete reference to accommodating buses/coaches, restricting vehicular traffic using Stockbridge Rd level crossing and provision of appropriate car parking.</li> <li>• Insufficient to suggest “restrict vehicular traffic using the Stockbridge Road level crossing”, lacks detail to give it any credence. <b>(Lavant Parish Council)</b></li> <li>• Road layout with level crossings being maintained does nothing to improve safety, communication, environmental issues. Item 7 completely misses the requirement.</li> </ul>				
Transport – Public Transport: <ul style="list-style-type: none"> <li>• Extend to include railway and other buildings. Requires extension to the station with an additional platform and line for a Metro service.</li> <li>• Masterplan can include sustainable road layout for pedestrians, cars and buses.</li> </ul>				

<ul style="list-style-type: none"> <li>• Need proper public transport hub with toilets, tourist information, waiting area, RTPI screens. Current bus/stations unwelcoming, not in keeping with the rest of the city.</li> <li>• Replacing bus station with bus stops on road are less conducive to supporting the modal shift onto public transport.</li> <li>• Not clear what proposals will be to ensure no negative impact to users of bus station.</li> <li>• References to bus depot not clear whether that includes bus station; present bus station is close to the railway station which is important for integrated travel;</li> </ul>
<p>Green Infrastructure:</p> <ul style="list-style-type: none"> <li>• Support opportunities for GI, links to countryside. New routes, links important on Coastal Plain; off-road multi-use path network beneficial to all NMUs. Would comply with aims of West Sussex Rights of Way Management Plan 2018-2028.</li> <li>• Include reference to incorporating blue/green infrastructure in and point 5 of policy. Point 5 - also refer to S29 GI, make reference to fully exploiting opportunities for sustainable drainage. Point 8 should refer to a surface water management plan as well as a waste water management plan. <b>(WSCC)</b></li> <li>• Reference trees, links to Lavant course, trees/greenspace in vicinity of Walls, north-east and north-west of site, and near Kingsham Road/Canal - opportunity to introduce GI to enhance this location and the connectivity of other sites.</li> <li>• Green space should be preserved and an additional pocket park added to the area.</li> <li>• As only brownfield site allocated, CDC should be more progressive in delivering GI and biodiversity net gains. Fantastic opportunity to incorporate innovative design, particularly increased green infrastructure e.g. green walls.</li> </ul>
<p>Environment</p> <ul style="list-style-type: none"> <li>• Comments made on adopted masterplan. Number of constraints to development, pleased to see specific criteria in the policy to ensure that these key constraints to the site within our remit are fully considered. <b>(Environment Agency)</b></li> <li>• Object to term 'mitigation' in relation to protecting nearby SPA from adverse impacts. If not resulting in avoidance of impacts then not effective and not legally compliant.</li> <li>• Reservations with respect to deliverability due to proximity to SINC, Floodzones 2 and 3 on site and heritage assets. Insufficient information to conclude site is suitable.</li> </ul>
<p>Conservation Area/ Listed Buildings</p> <ul style="list-style-type: none"> <li>• Site includes listed buildings/non designated heritage assets, buildings of interest, is within CA and near to listed buildings. <b>(Historic England)</b></li> <li>• Criterion 3 and 9 are supported but should be strengthened. <b>(Historic England)</b></li> <li>• Policy should more strongly promote opportunity to use heritage of the area to define its character and the desirability of new development. <b>(Historic England)</b></li> </ul>
<p>Current Buildings/Design:</p> <ul style="list-style-type: none"> <li>• Statements about buildings in area not making positive contribution are misleading e.g. bus garage is an example of early use of thin-shell pre-stressed concrete/ might not be "liked" but examples of their time and should be preserved.</li> <li>• Chichester Gate remains an eyesore</li> <li>• Listed and locally listed buildings of architectural or historic interest should be protected from demolition.</li> </ul>
<p>Minerals and Waste:</p> <ul style="list-style-type: none"> <li>• Reference should be made to the mineral infrastructure safeguarding policy M10 as within 200m of the Chichester Railhead. <b>(WSCC)</b></li> </ul>

<ul style="list-style-type: none"> <li>• All waste water must be pumped to Tangmere.</li> <li>• Good water supply system. Reference to 'efficient use of water' confusing, many of strategic sites also drain to Apuldram. Sites need to be water efficient but not follow example of 'Code for Sustainable Homes'. Alternative provision possibly to reduce infiltration but not clear how funded, who would do work. <b>(Portsmouth Water Ltd)</b></li> </ul>
<p>Education</p> <ul style="list-style-type: none"> <li>• Sufficient space/expansion capacity to accommodate the child product from 350 dwellings. <b>(WSCC)</b></li> <li>• Consideration to cumulative impact of housing in AL6 to allocate land within the area for a 1FE-2FE primary. Pro rata financial contributions towards the build costs would be sought from developers to mitigate their impact. <b>(WSCC)</b></li> <li>• Expansion capacity to accommodate secondary aged pupils. Contributions would be required for expansion of secondary schools if feasible and required. <b>(WSCC)</b></li> <li>• Expansion capacity to accommodate the child product from this proposed development for sixth form pupils. Contributions would be required for expansion of the provision if feasible and required. <b>(WSCC)</b></li> </ul>
<p>Housing and Employment</p> <ul style="list-style-type: none"> <li>• Need to include suitable housing for young people/ housing mix reflecting current population range.</li> <li>• Need employment sites for entrepreneurs. A link to the gigabyte project</li> <li>• Need multi use building for concerts, conferences, exhibitions and community activity.</li> <li>• Reliance on commercial and housing development in area misplaced. Success or otherwise will depend on a community led development scheme that incorporates significant public open space and high quality buildings.</li> <li>• Doesn't give clarity to Homes England that principle of residential development on the Police playing fields is acceptable. At pre-application and formal application stage decision makers may take the view that loss of open space on the Police playing pitches would be contrary to Council's local evidence base. <b>(Homes England)</b></li> </ul>
<ul style="list-style-type: none"> <li>• Object to 6.41- Playing pitches are valuable assets, once built on cannot be put back.</li> <li>• The current CDC Masterplan does not meet the objectives set out in AL5 and wastes a huge opportunity to enhance the public realm in Chichester, in particular it does not currently include specific proposals for a high quality distinctive design response.</li> </ul>
<p>Other</p> <ul style="list-style-type: none"> <li>• Idea is completely ludicrous and a waste of tax payers money!</li> </ul>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p> <p>A masterplan which provides detailed guidance on the expectations for development in this area was adopted by the Council in December 2017. The detailed comments received in the Preferred Approach consultation will be provided to the Southern Gateway project team for consideration any appropriate response.</p> <p>The approach to transport will come forward in two complimentary studies. Chichester Vision – Transport Feasibility Study and Sustainable Transport Package Feasibility for Chichester Study are being progressed with guidance from West Sussex County Council as Highway Authority, and the findings from that work will be reflected in this policy in the next iteration of the Plan.</p> <p>The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>The comments and issues raised in this consultation will be considered further in terms of</p>

whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

<b>Policy AL6 Land South West of Chichester</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 4	4	0	4	0
Policy: 123	194	13	149	32
Representation numbers:				
<p>3545, 3536, 3526 (West Wittering PC), 3460, 3343 (Nexus Planning obo CEG), 3247 (Henry Adams LLP obo WSCC Estates), 3183, 3168, 3160, 3145 (David Lock Associates obo Rolls-Royce Motor Cars Ltd), 3131, 3087 (Chichester Harbour Conservancy), 2923 (CPRE Sussex), 2909, 2776, 2770 (Sussex Wildlife Trust), 2635, 2574 (Earnley PC), 2570 (Birdham PC), 2556 (Chichester Harbour Trust), 2478 (Fishbourne PC), 2416 (SDNPA), 2377, 2376, 2375, 2374 (Birdham PC), 2360 (West Sussex Local Access Forum – WSLAF), 2334 (Southern Water), 2331, 2321, 2306 (Portsmouth Water), 2293, 2288, 2268 (Historic England), 2267, 2241, 2238, 2214 (Environment Agency), 2193, 2184, 2181, 2180, 2179, 2178, 2177, 2174, 2173, 2172, 2170, 2169, 2168, 2166, 2165, 2163, 2161, 2154 (WSCC), 2153 (WSCC), 2125 (WSCC), 2086 (WSCC), 2077, 22075, 2073, 2072, 2070, 2068, 2067, 2066, 2044, 2038 (Sussex Ornithological Society), 2008 (RSPB), 1999, 1978, 1946, 1945, 1943, 1942, 1938, 1907, 1900, 1899, 1898, 1897, 1891, 1883, 1880, 1869, 1866, 1860, 1854, 1852, 1845, 1810, 1805, 1794 (Harbour Villages Lib Dems Campaign Team), 1793 (Harbour Villages Lib Dems Campaign Team), 1787 (Harbour Villages Lib Dems Campaign Team), 1773, 1745, 1742, 1737, 1659, 1621, 1526 (Natural England), 1500, 1495, 1491, 1484, 1464, 1452 (WYG obo Berkeley Strategic Land Ltd), 1448, 1447 (Donnington PC), 1421, 1410, 1398, 1366, 1351, 1346, 1344, 1322, 1283, 1238, 1227, 1224, 1216, 1195, 1192, 1190, 1166, 1152, 1142 (British Horse Society), 1129, 1086, 1060, 1048, 1047, 1046, 1037, 1026, 1008, 985, 965, 951, 946, 922, 921, 908, 892, 878, 876, 874, 854, 853, 850, 818, 801, 781, 770, 769, 757, 756, 752, 743, 722 (West Itchenor Parish Council), 700, 685, 636, 628, 624, 608, 556, 543, 518, 513, 478, 462, 385, 354, 338, 337, 318, 311, 308, 285, 280, 279, 275, 250 (Sustrans), 146, 131, 130 (Chichester Society), 98, 96, 46, 34</p>				
Summary of issues and key comments raised by residents and other respondents				
<p>Insufficient evidence to demonstrate suitability/deliverability in light of known constraints (Flooding – SFRA2 is required, landscape (Landscape and Visual Character Assessment required), transport, environmental impact) all need further testing. 2214 (<b>Environment Agency</b>), 1526 (<b>Natural England</b>),</p>				
Support:				
<p>Additional housing could be accommodated on the site to ensure infrastructure is delivered (<b>WSCC Estates</b>)</p>				
Policy wording:				
<ul style="list-style-type: none"> <li>• Policy needs to refer to all constraints and protection of (including but not limited to) view of Chichester Cathedral framed by SDNP, impact on Salterns Way, Impact on Apuldram WWTW, air quality, respect SSSI and AONB, SPA, SAC, RAMSAR site, River Lavant Marsh LWS, Brent Geese and Wader Strategy</li> <li>• Ensure retention of separation between Apuldram, Donnington and Fishbourne 1447 (<b>Donnington PC</b>)</li> <li>• Support Clause 6 and 3 requiring mitigation and a Landscape and Visual Assessment (Natural England)</li> <li>• Strengthen wording on flood risk and ensure properly identified to limit housing to FZ1 and proper mitigation proposed. 2153 (<b>WSCC</b>), 2214 (<b>Environment Agency</b>)</li> <li>• Support requirement 5. 250 (<b>Sustrans</b>)</li> <li>• Support creation of green routes and links to comply with West Sussex rights of Way Management Plan.</li> </ul>				
Object on grounds of impact on environment:				
<ul style="list-style-type: none"> <li>• Views of Chichester Cathedral/Harbour/SDNP</li> </ul>				

<ul style="list-style-type: none"> <li>• Impact on Chichester Harbour AONB, SPA, SAC, SSSI, RAMSAR site, wildlife corridor, biodiversity, Brent Geese and close to sites in Solent Brent Goose and Wader Strategy.</li> <li>• Flood risk and climate change</li> <li>• Air quality</li> <li>• Noise</li> <li>• Light pollution/dark night skies</li> <li>• Soil pollution</li> <li>• Lavant Marsh LWS and chalk stream</li> <li>• Loss of green buffer between Chichester and Manhood Peninsula –a rea should be strategic gap between Apuldram and Donnington</li> <li>• Water quality 1526 (<b>Natural England</b>)</li> </ul>
<p>Object on grounds of impact on infrastructure:</p> <ul style="list-style-type: none"> <li>• Link road – cause additional delays and lead to more congestion on roundabout, environmental impact, concern over need for elevation of link road</li> <li>• Require public transport/walking/cycling links to city centre and links to Salterns Way and A286. 2154 (<b>WSCC</b>), 1447 (<b>Donnington PC</b>)</li> <li>• To proposed Country Park as AONB already designated. 3087 (<b>CHC</b>)</li> <li>• Refer to infrastructure safeguarding policy M10 of Minerals Plan. 2086 (<b>WSCC</b>)</li> <li>• Loss of agricultural land and food production.</li> <li>• General services and infrastructure (GP surgeries)</li> </ul>
<p>Include additional land:</p> <ul style="list-style-type: none"> <li>• Lawrence Farm (<b>Berkeley Strategic</b>)</li> </ul>
<p>Comment:</p> <ul style="list-style-type: none"> <li>• School capacity – allocate land for a 1-2 FE primary school. Contributions needed for secondary and 6<sup>th</sup> form pupils. 2125 (<b>WSCC</b>)</li> <li>• Wastewater capacity. Currently limited capacity. New waste water infrastructure need to be put in place ahead of development. Odour assessment required. 2334 (<b>Southern Water</b>)</li> <li>• Suggested alternative uses for the site – bus station relocation, Royal Mail depot, Park and Ride, clean energy (solar panels).</li> <li>• Portsmouth Water advised there is a water mains crossing the site that will need to be relocated (<b>Portsmouth Water</b>)</li> <li>• Wrong type of employment proposed.</li> </ul>
<p>Object on grounds of conflict with other policies within the plan</p>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p>
<p>Significant objections received to this policy highlight a number of environmental and delivery issues with this proposal. Further evidence on the deliverability of this proposal would be required before it could be included in the next iteration of the Plan. Further transport work has been commissioned to consider further the implications if the proposed Stockbridge Link Road is not delivered.</p> <p>A review of the Housing and Economic Development Needs Assessment has been commissioned and the findings will inform the requirements for additional employment land within the district.</p> <p>The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this proposed allocation development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.</p>

<b>Policy AL7 Highgrove Farm, Bosham</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 11	11	1	9	1
Policy: 79	83	3	65	15
Representation numbers				
239, 3291 (Luken Beck obo Barratt Homes), 1647 (King & Co obo Heaver Homes), 1269, 1658, 706, 272, 402, 3344 (Nexus Planning obo CEG), 3127, 2767, 1690, 728, 3362 (Landlink Estates), 29, 261, 984, 2859, 2509 (Bosham Parish Council), 2557 (Chichester Harbour Trust), 421, 439, 87, 1425, 71, 1207, 3156, 213, 387, 891, 931, 1291, 3153, 1485, 3088 (Chichester Harbour Conservancy), 398, 399, 403, 532, 895, 1473, 1476, 1453, 1472, 1434, 2714, 601, 599, 404, 408, 1397, 3207, 405, 968, 414, 2087 (West Sussex County Council), 77, 2405 (South Downs National Park Authority), 1528 (Natural England), 820, 1795 (Harbour Villages Lib Dems Campaign Team), 289, 1795 (Harbour Villages Lib Dems Campaign Team), 1336, 268, 2141 (West Sussex County Council), 1334, 833, 2269 (Historic England), 1315, 3185, 251 (Sustrans), 3053, 1329, 2661, 47, 822, 1750, 1297, 1439, 746, 2957, 780, 1052 (Bosham Football Club), 2361 (West Sussex Local Access Forum), 1143 (British Horse Society), 2772 (Sussex Wildlife Trust), 2335 (Southern Water), 2307 (Portsmouth Water), 424, 1436, 2706, 417, 37, 2924,				
Summary of issues and key comments raised by residents and other respondents				
Support in principle <b>(Luken Beck obo Barratt Homes, King &amp; Co obo Heaver Homes, British Horse Society, West Sussex Local Access Forum)</b>				
Object <b>(Nexus Planning obo CEG, Landlink Estates, Bosham Parish Council, Chichester Harbour Trust, Chichester Harbour Conservancy)</b>				
<ul style="list-style-type: none"> <li>Impact on infrastructure</li> </ul>				
Education:				
<ul style="list-style-type: none"> <li>Support relocation of school <b>(Harbour Villages Lib Dems Campaign Team)</b></li> <li>Proposal to relocate school unacceptable, as would move it outside of village</li> <li>No need for new school</li> <li>Developer does not propose to deliver new school but to provide 2 hectares of land to accommodate new school <b>(Luken Beck obo Barratt Homes)</b></li> <li>Potential oversupply of school places within school planning area <b>(West Sussex County Council)</b></li> </ul>				
Coalescence:				
<ul style="list-style-type: none"> <li>Would contribute to coalescence along A259 corridor between Emsworth and Chichester</li> <li>Need to maintain a gap between Fishbourne and Bosham <b>(Bosham Parish Council)</b></li> <li>Threatens identity of Bosham village</li> </ul>				
Wastewater and water quality:				
<ul style="list-style-type: none"> <li>Limited existing capacity at closest provider – need to provide evidence that capacity exists <b>(Southern Water)</b></li> <li>Connection of new development at site prior to new infrastructure may increase flooding <b>(Southern Water)</b></li> <li>No large diameter mains within the area <b>(Portsmouth Water)</b></li> <li>No wastewater management plan</li> <li>Concerned that the SA scores this allocation poorly for wastewater treatment</li> </ul>				
Open space and sports pitch provision:				
<ul style="list-style-type: none"> <li>Football club would welcome relocation of club onto site <b>(Bosham Football Club)</b></li> <li>Object to inclusion of sports pitch, open space is to be multifunctional naturalistic</li> </ul>				

<p>green space (<b>Luken Beck obo Barratt Homes</b>)</p> <ul style="list-style-type: none"> <li>• Policy does not identify provision to make up deficit in parks and recreation grounds or youth provision (<b>Bosham Football Club</b>)</li> <li>• Requirement for new cricket pitch (<b>Harbour Villages Lib Dems Campaign Team</b>)</li> </ul>
<p>Impact on AONB:</p> <ul style="list-style-type: none"> <li>• Concerned about proximity to AONB (<b>Chichester Harbour Trust</b>)</li> <li>• Land available for housing within the AONB</li> <li>• Impact on intervisibility between AONB and National Park (<b>Chichester Harbour Trust, Chichester Harbour Conservancy</b>)</li> </ul>
<p>Landscape:</p> <ul style="list-style-type: none"> <li>• Allocation should be informed by an LVIA (<b>Natural England</b>)</li> <li>• Landscape capacity study shows that 250 dwellings is maximum to be accommodated (<b>Bosham Parish Council</b>)</li> <li>• Wording could be more robust (<b>South Downs National Park</b>)</li> </ul>
<p>Transport:</p> <ul style="list-style-type: none"> <li>• Traffic already at saturation</li> <li>• Should include safe, segregated pathways and cycleways (<b>Harbour Villages Lib Dem Campaign Team, Sustrans</b>)</li> <li>• Negative impact on A27 and A259</li> <li>• Lack of existing public transport</li> </ul>
<p>Environment:</p> <ul style="list-style-type: none"> <li>• Increase in air, noise and light pollutions</li> <li>• High grade agricultural land</li> <li>• Damage to habitats and biodiversity</li> </ul>
<p>Flood risk:</p> <ul style="list-style-type: none"> <li>• Loss of floodplain</li> <li>• Potential for moderate risk of groundwater flooding (<b>West Sussex County Council</b>)</li> </ul>
<p>Heritage:</p> <ul style="list-style-type: none"> <li>• Expect potential for non-designated archaeology to be assessed (<b>Historic England</b>)</li> <li>• Damage to views of Chichester Cathedral</li> </ul>
<p>Green infrastructure:</p> <ul style="list-style-type: none"> <li>• Requirement for GI is not ambitious enough and does not align with paragraphs 20 and 174 of the NPPF (<b>Sussex Wildlife Trust</b>)</li> <li>• Welcome opportunities for provision of GI (<b>West Sussex Local Access Forum, British Horse Society</b>)</li> </ul>
<p>Amendments to policy and text wording:  <b>(West Sussex County Council, Bosham Parish Council, South Downs National Park Authority, Natural England)</b></p>
<p>Additional site proposed:</p> <ul style="list-style-type: none"> <li>• Land between Walton and Delling Lanes</li> <li>• French Gardens</li> <li>• Land adjacent to the new hospice</li> <li>• Broadbridge Farm (<b>CALA Group Ltd</b>)</li> <li>• North of Broadbridge (<b>King &amp; Co obo Heaver Homes</b>)</li> </ul>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p>
<p>Where appropriate comments regarding infrastructure requirements will be addressed through an updated Infrastructure Delivery Plan and associated documents such as additional transport evidence and update to the Water Quality Assessment. In particular, confirmation is being sought on the overall need for school places and the requirement for a new primary school in this location. The next iteration of the Plan will reflect any update received from the County Council as Education Authority. This will inform the identification of any potential for a sports pitch at this location.</p>

The environmental impacts have been considered through the evidence base prepared to date, including the Strategic Flood Risk Assessment and Landscape Capacity Study, Habitats Regulations Assessment and Sustainability Appraisal. Further iterations of this work will consider further those impacts.

Sites promoted as alternatives will be considered where appropriate through a refresh of the Housing and Economic Land Availability Assessment, and if necessary through further Sustainability Appraisal work.

The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

<b>Policy AL8 East Wittering Parish</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 2	2	0	1	1
Policy: 39	41	3	30	8
Representation numbers				
935, 74, 2308 (Portsmouth Water), 2183, 2126 (WSCC), 1686, 1469, 1428, 964, 735, 544, 506 (EW & Bracklesham PC), 99, 67, 38, 1686, 1428, 964, 2958, 2925(CPRE), 2663, 2002, 1753, 1743, 1672, 1469, 1428, 1296, 1296, 912, 834, 823, 252, 2039, 1019, 958, 2773 (SWT), 1627, 3366, 3307, 2695, 2183, 1672, 1532, 912, 723 (West Itchenor PC), 834, 544, 2695, 2695, 2362, 2142 (WSCC), 1144, 2089, 2010 (RSPB), 3345				
Summary of issues and key comments raised by residents and other respondents				
Support <ul style="list-style-type: none"> <li>Suggest 2 separate sites rather than one and development could also be accommodated at Stubcroft Farm and Church Road</li> <li>Opportunities for green infrastructure links to wider countryside (<b>WSCC, EW &amp; Bracklesham PC</b>)</li> </ul>				
Infrastructure <ul style="list-style-type: none"> <li>Expansion/improvement to existing facilities (health, WWTW) required to meet new demand and to support parts of development within West Wittering Parish</li> <li>Capacity at existing schooling to accommodate new development (<b>WSCC</b>)</li> <li>Allocation should be more appropriate to size of EW and should be allocated in accordance with evidence base rather than through Neighbourhood Plans</li> </ul>				
Employment <ul style="list-style-type: none"> <li>Lack of employment opportunities, resist loss of employment/commercial uses.</li> </ul>				
Transport and Access <ul style="list-style-type: none"> <li>Access road already congested and insufficient mitigation proposed to accommodate new development</li> <li>Improve sustainability of site with cycle and footpath network linking Medmerry with EW and links to Salterns Way.</li> <li>Need to improve public transport prior to development</li> <li>A27 improvements needed before development can take place</li> </ul>				
Environmental Considerations <ul style="list-style-type: none"> <li>Mitigation measures need to be clarified prior to development taking place to ensure no significant impact on Pagham Hbr SPA/Chichester Harbour AONB, SAC, SSI, Ramsar and Medmerry designations</li> <li>Global warming and sea level rise should be taken into account and NPPF requires a 'fall back' area in event of coastal erosion</li> <li>Concern increase in development will lead to increase in pollution levels</li> <li>Concern lack of firm timescales could impact on ability to undertake HRA and ensure identified sites do not conflict with designated site interests (<b>RSPB</b>)</li> <li>Loss of agricultural land</li> </ul>				
Type of development <ul style="list-style-type: none"> <li>Development should include affordable housing and homes for the elderly</li> <li>Restrict houses being purchased as second homes or holiday lets</li> </ul>				
Tourism <ul style="list-style-type: none"> <li>Concern overdevelopment would have negative impact on tourist industry which is valuable economic benefit to local area</li> </ul>				
West Sussex Waste Local Plan <ul style="list-style-type: none"> <li>Safeguarding policies with regards to minerals and waste should be referenced in Neighbourhood Plans and given due consideration in consultation with West Sussex County Council when allocating sites. (<b>WSCC</b>)</li> </ul>				

Initial Council response to issues raised and way forward for the Local Plan Review

Where appropriate comments regarding infrastructure requirements will be addressed through an updated Infrastructure Delivery Plan and associated documents such as additional transport evidence and update to the Water Quality Assessment.

The environmental impacts have been considered through the evidence base prepared to date, including the Strategic Flood Risk Assessment and Landscape Capacity Study, Habitats Regulations Assessment and Sustainability Appraisal. Further iterations of this work will consider further those impacts.

The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

It is understood that the parish council no longer intend to bring forward a neighbourhood plan to deliver this allocation. Therefore sites will be considered for allocation in the next iteration of the District Plan following an appraisal of options in the Housing and Economic Land Availability Assessment and Sustainability Appraisal, Habitats Regulations Assessment and other evidence studies.

<b>Policy AL9 Fishbourne Parish</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 17	20	1	13	6
Policy: 87	93	9	61	23
Representation numbers				
<p>35,1104,1668, 274, 1799, 887, 1538, 528, 1380, 3346 (Nexus Planning obo CEG), 2128 292, 674, 144, 291, 2021, 3417 (Genesis Town Planning obo Seaward Properties), 70 2477 (Fishbourne Parish Council), 3091 (Chichester Harbour Conservancy), 1057, 758, 1106, 545, 527, 309, 210, 1801 (Harbour Lib Dems Campaign), 1709, 2558 (Chichester Harbour Trust), 743, 3055, 3164, 3163, 184, 536, 1525, 1065, 1197, 3081, 1406, 925, 1198, 1391, 615, 1991, 1474 (Fishbourne Neighbourhood Plan Group), 2503, 3159, 3149 3158, 826, 132, 1851, 75, 3028 (Strutt and Parker obo William Lacey Group),2782 (ICENI Projects obo Fishbourne Developments),3225 (Henry Adams obo The Feltham Family) 3230 (Henry Adams obo The Smith Family),3259 (Henry Adams obo WSCC Estates) 3276 (Genesis Town Planning obo Landacre Developments), 534, 887, 528, 1380, 144, 927,1961, 2507, 2326, 1057, 545, 210,1801 (Harbour Lib Dems Campaign), 3055, 3164, 1065, 925, 1391, 2503, 2900, 2878, 639, 309, 527, 68, 2822, 1104, 1538, 1380, 292, 1441,1490, 2326, 1525, 925, 2503, 3149, 1851, 1538, 3028 (Strutt and Parker obo William Lacey Group), 2216 (Environment Agency), 2778 (Sussex Wildlife Trust), 2090 (WSCC), 2270 (Historic England),1530 (Natural England), 2336 (Southern Water), 2406 (South Downs National Park Authority), 2477, 387,1525, 826, 3090 (Chichester Harbour Conservancy), 3089 (Chichester Harbour Conservancy),386, 817 (Fishbourne Parish Council), 819 (Fishbourne Parish Council), 35, 1538, 1530 (Natural England), 2476 (Fishbourne Parish Council), 3259 (Henry Adams obo WSCC Estates),2873 (Rodway Planning), 2011 (RSPB),3346 (Nexus Planning obo CEG), 1196, 927, 313, 181, 3091 (Chichester Harbour Conservancy), 836, 2558 (Chichester Harbour Trust), 3123, 1197, 1198, 639, 536, 1145 (British Horse Society), 2363 (West Sussex Local Access Forum), 3510, 927, 1762, 1530 (Natural England), 2336 (Southern Water), 1196, 2309 (Portsmouth Water), 2477 (Fishbourne Parish Council), 313, 3091 (Chichester Harbour Conservancy), 1106, 2558 (Chichester Harbour Trust), 3123, 615, 1380, 927, 1961, 2507, 210, 3123, 3164, 1406, 1198, 1391, 639, 536, 1851, 3187, 2486, 2502, 48, 528, 2143 (WSCC),2401, 2128, 253, 294, 1744, 3510, 144, 281, 1196, 211, 291, 1818, 927, 2507, 2477 (Fishbourne Parish Council), 313, 182, 2665, 1057, 1106, 210, 2743, 2848, 3055, 3164,3163, 3081, 1406, 925, 615, 2474 (Fishbourne Neighbourhood Plan Group), 3149, 639, 536, 826, 132, 1851, 3187, 2486, 35, 48, 528, 3510, 281, 211, 1490, 2848, 3164, 1538 1198, 3159, 3149, 536, 2476 (Fishbourne Parish Council), 2502, 1668, 1380, 2128, 211 1818, 927, 1490, 1961, 313, 758, 210, 3123, 3164, 3163, 1197, 3081, 1391, 1991, 536 527, 132, 1851, 2502, 1668, 528, 3510, 210, 2558 (Chichester Harbour Trust), 1197, 3149, 639, 2127 (WSCC), 144, 927, 313, 210,2743, 2848, 3123, 3164, 3163, 3081, 1406, 615, 3159, 639, 536, 132, 1668, 528,1380,281, 1196, 927, 1961, 2507, 181, 836, 3164, 3081, 1406, 1391, 615, 639, 536, 132, 281, 927, 3163, 3081, 2782 (ICENI Projects obo Fishbourne Developments), 3225 (Henry Adams obo The Feltham Family), 3230 (Henry Adams obo The Smith Family), 3259 (Henry Adams obo WSCC Estates), 2751 (Gleeson Strategic Land), 2873 (Rodway Planning), 3417 (Genesis Town Planning obo Seaward Properties), 1961, 836, 1106, 1197</p>				
Summary of issues and key comments raised by residents and other respondents				
<p>Object to scale of development</p> <ul style="list-style-type: none"> <li>• Impact on infrastructure (including local transport network which is already at capacity, both the A259 and A27) (<b>Fishbourne Neighbourhood Plan Group</b>)</li> <li>• Deliverability (<b>Nexus Planning obo CEG</b>) (<b>Fishbourne PC</b>)</li> <li>• No identified housing need, need more information on how this figure was arrived at (<b>Fishbourne Neighbourhood Plan Group</b>)</li> </ul>				

<ul style="list-style-type: none"> <li>• Unsustainable development (<b>Harbour Lib Dems Campaign</b>)</li> <li>• Spread allocation across more than one site to include Bethwines Farm, land east of Clay Lane, land south of Clay Lane, land east of Deeside Avenue, land east of Fishbourne, land at Fourways, land to rear of 98 Fishbourne Road, land north of A27 (<b>Genesis Town Planning obo Seaward Properties</b>)( <b>Henry Adams obo The Feltham Family</b>) (<b>Henry Adams obo The Smith Family</b>) (<b>Gleeson Strategic Land</b>) (<b>Rodway Planning</b>) (<b>Genesis Town Planning obo Seaward Properties</b>)</li> <li>• Inadequate mitigation on the Harbour (<b>Chichester Harbour Conservancy</b>) (<b>Chichester Harbour Trust</b>)</li> <li>• Loss of agricultural land (<b>Chichester Harbour Conservancy</b>)</li> <li>• Additional facilities required to support development, both existing and proposed (<b>Fishbourne PC</b>)</li> </ul>
<p>Support (<b>Genesis Town Planning obo Landacre Developments</b>) (<b>Strutt and Parker obo William Lacey Group</b>) (<b>ICENI Projects obo Fishbourne Developments</b>) (<b>Henry Adams obo WSCC Estates</b>)</p> <ul style="list-style-type: none"> <li>• Sites can deliver above proposed growth (<b>ICENI Projects obo Fishbourne Developments</b>)</li> <li>• Allocation should be spread across multiple sites/dispersed allocation (<b>Genesis Town Planning obo Landacre Developments</b>)</li> <li>• Support requirement for provision of Green Infrastructure and for the provision of segregated and maintained paths between developments and other routes (<b>British Horse Society</b>) (<b>West Sussex Local Awareness Forum</b>) (<b>WSCC</b>)</li> </ul>
<p>Bethwines Farm</p> <ul style="list-style-type: none"> <li>• Object (<b>Harbour Lib Dems Campaign</b>) to development here due to landscape impact, policies S24, 25 and 26 should be applied to development on this site (<b>Fishbourne Parish Council</b>)</li> <li>• Should be retained as a viable farm and/or wildlife corridor</li> </ul>
<p>Clay Lane</p> <ul style="list-style-type: none"> <li>• Should not be a wildlife corridor (<b>Harbour Lib Dems Campaign</b>)</li> </ul>
<p>Policy wording</p> <ul style="list-style-type: none"> <li>• Remove criterion 5</li> <li>• Amend point 3 to include 'A range of types, sizes and tenures of residential accommodation in line with the Fishbourne Neighbourhood Plan' to include special provision.....</li> <li>• Amend policy wording to 'Neighbourhood Plan review should consider meeting need through allocation of small and large sites' (<b>Strutt and Parker obo William Lacey Group</b>)</li> <li>• Make specific reference to issues for consideration (including the South Protection Zone, protecting heritage assets and their setting, the SDNP and improving links to the SDNP and Chichester Harbour AONB, Air, noise and light pollution, Solent Wader and Brent Goose Strategy) in the Neighbourhood Plan when identifying sites (<b>Environment Agency</b>) (<b>Historic England</b>) (<b>SDNPA</b>) (<b>Natural England</b>)</li> <li>• Reference Joint Minerals and Waste Local Plan Safeguarding policies (<b>Sussex Wildlife Trust</b>)</li> <li>• Amend policy wording to       <ul style="list-style-type: none"> <li>“6. Expansion and provision of green infrastructure into the wider countryside including between settlements and facilities;</li> <li>7. Demonstration that development would not have an adverse impact on the nature conservation interest of identified sites and habitats and that measurable net gains to</li> </ul> </li> </ul>

<p>biodiversity will be delivered;</p> <p>8. Provide mitigation to ensure the protection of the SPA, SAC and Ramsar site at Chichester Harbour as a result of water quality issues relating to runoff into a designated site, and avoiding loss of functionally linked supporting habitat...”  <b>(Sussex Wildlife Trust)</b></p> <ul style="list-style-type: none"> <li>• Add criteria to consider waste water <b>(Natural England) (Southern Water)</b></li> <li>• Amend paragraph 6.62 to state that Chichester Harbour is not to the south of the village as the AONB boundary includes the part of Fishbourne up to the A259 <b>(Chichester Harbour Conservancy)</b></li> <li>• Paragraph 6.65 point 2 should refer to the relationship with Bosham <b>(Fishbourne PC)</b></li> <li>• Policy should refer to groundwater quality protection and the additional requirements when using infiltration systems where development is in a source protection zone <b>(Portsmouth Water)</b></li> </ul>
<p>Neighbourhood Plan</p> <ul style="list-style-type: none"> <li>• Land at Deeside Avenue currently allocated for community purposes in NP is landlocked therefore not deliverable <b>(Henry Adams obo WSCC Estates)</b></li> <li>• Concern over deliverability if left to NP <b>(Nexus Planning obo CEG), (Rodway Planning)</b></li> <li>• No indication of timescales for NP review and potential impact on ability to undertake HRA <b>(RSPB)</b></li> </ul>
<p>Environmental Considerations</p> <ul style="list-style-type: none"> <li>• Require more detail on location of sites given environmental sensitivity of area, potential increase in pollution (including impact on water quality) and an increase in recreational disturbance and potential conflict with environmental designations <b>(RSPB) (Chichester Harbour Conservancy) (Fishbourne Parish Council) (Chichester Harbour Trust)</b></li> <li>• The SA identifies a problem with WWTW for this location, sewer and wastewater treatment capacity should be considered <b>(Natural England) (Southern Water) (Chichester Harbour Conservancy)</b></li> <li>• Breach of current and emerging AONB Management Plan <b>(Chichester Harbour Conservancy)</b></li> </ul>
<p>Settlement identity/coalescence</p> <ul style="list-style-type: none"> <li>• Need to prevent the merger between Fishbourne and Chichester and Fishbourne and Bosham</li> </ul>
<p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Primary school at capacity although expansion maybe possible. Sufficient secondary school capacity. Contributions required <b>(WSCC)</b></li> </ul>
<p><b>Initial Council response to issues raised and way forward for the Local Plan Review</b></p> <p>The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified. Comments regarding landscape and ecological designations are noted. In March 2019 the <i>Revised Landscape Capacity Study</i> was produced which confirmed the assessment in the November 2018 study regarding the capacity for landscape change. The Preferred Approach Plan notes the potential landscape sensitivities, including protecting views to the South Downs National Park and Chichester Harbour Area of Outstanding Natural Beauty and their settings.</p> <p>The objections relating to the wildlife corridor are noted. Further work is required to determine the final location and extent of the wildlife corridor, and consider the impact that</p>

may have on the capacity of this area to deliver the levels of development envisaged in the policy.

Therefore further consideration will need to be given to the capacity of this service village area to accommodate development, particularly with regards to landscape capacity and the proposed wildlife corridor.

<b>Policy AL10 Chidham and Hambrook Parish</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 8	8	0	5	3
Policy: 45	51	5	33	13
Representation numbers				
2255, 63, 2499 (Chidham and Hambrook PC), 1146 (British Horse Society), 3092 (Chichester Harbour Conservancy), 3093 (Chichester Harbour Conservancy), 2781 (Sussex Wildlife Trust), 2091 (WSCC), 2129 (WSCC), 2144 (WSCC), 2271 (Historic England), 1534 (Natural England), 2408 (SDNPA), 3367 (Landlink Estates), 3016 (Neame Sutton obo Sunley Estates), 1419, 2403, 1847, 529, 837, 2666, 49, 137, 3188, 2493 (Chidham and Hambrook Parish Council), 827, 1732, 180, 254 (Sustrans), 1600, 2027, 1206, 1182, 1235, 1758, 1746, 1802 (Harbour Villages Lib Dems Campaign Team), 1803 (Harbour Villages Lib Dems Campaign Team), 3422 (Genesis Town Planning obo Seaward Properties), 1426, 1436, 1438, 1862, 2147, 1487, 1488, 2162, 1861, 2032, 3533 (Chidham Sustainability Network), 1884 (Chidham Sustainability Network), 1914, 1917, 1918, 2310 (Portsmouth Water), 2364 (West Sussex Local Access Forum), 2559 (Chichester Harbour Trust), 3262, 3347 (Nexus Planning obo CEG)				
Summary of issues and key comments raised by residents and other respondents				
Support <b>(Neame Sutton obo Sunley Estates, British Horse Society, West Sussex Local Access Forum)</b>				
Object: <ul style="list-style-type: none"> <li>• Size of allocation <b>(Chidham Sustainability Network, Harbour Villages Lib Dems Campaign Team, Chidham and Hambrook PC, Sussex Wildlife Trust, Landlink Estates)</b></li> <li>• Infrastructure to be provided before housing</li> <li>• Inadequate distribution of housing <b>(Chidham Sustainability Network)</b></li> <li>• Impact on, and lack of, infrastructure</li> <li>• Impact on local character</li> <li>• Impact on landscape</li> <li>• Service Village designation</li> <li>• Specific sites – Orchard Farm, Drift Lane and Baileys Field.</li> </ul>				
Neighbourhood Plan: <ul style="list-style-type: none"> <li>• Question deliverability of allocation through neighbourhood plan process <b>(Nexus Planning obo CEG, Neame Sutton obo Sunley Estates)</b></li> <li>• Conflict of interest between Chidham &amp; Hambrook parish and Southbourne where land within Southbourne parish may be allocated but in reality forms part of Hambrook</li> <li>• Allocation of sites in NP should conform with paras 184 and 194 of NPPF <b>(Historic England)</b></li> </ul>				
Impact on AONB: <ul style="list-style-type: none"> <li>• Allocation should not erode setting of AONB <b>(Chichester Harbour Trust)</b></li> <li>• AONB should come before the National Park in sentences <b>(Chichester Harbour Conservancy)</b></li> <li>• Major development on fringe of AONB <b>(Chichester Harbour Conservancy)</b></li> </ul>				
National Park: <ul style="list-style-type: none"> <li>• Strengthen wording regarding conservation and enhancement of National Park <b>(SDNPA)</b></li> </ul>				
Coalescence: <ul style="list-style-type: none"> <li>• Contribute to coalescence along the A259 <b>(Chichester Harbour Trust)</b></li> </ul>				
Green infrastructure: <ul style="list-style-type: none"> <li>• Welcome opportunities to provide GI links to countryside and coastal plain <b>(West</b></li> </ul>				

<p><b>Sussex Local Access Forum, British Horse Society)</b></p> <ul style="list-style-type: none"> <li>• Create multifunctional access route on path using A27 overbridge to maximise existing GI value (<b>WSCC</b>)</li> <li>• Include criterion requiring provision of GI (<b>SDNPA</b>)</li> </ul>
<p>Water and wastewater:</p> <ul style="list-style-type: none"> <li>• Site should be considered in combination with Southbourne and Bosham allocations (<b>Portsmouth Water</b>)</li> <li>• No large diameter mains in area and mains reinforcements may be required (<b>Portsmouth Water</b>)</li> <li>• Impacts on water quality from sewage (<b>Natural England, Chichester Harbour Conservancy</b>)</li> </ul>
<p>Environment:</p> <ul style="list-style-type: none"> <li>• Acknowledge presence of Local Wildlife Site in text (<b>Sussex Wildlife Trust</b>)</li> <li>• Make reference to recreational disturbances (<b>Sussex Wildlife Trust, Natural England</b>)</li> <li>• Refer to Solent Wader and Brent Goose Strategy (<b>Natural England</b>)</li> <li>• Loss of agricultural land (<b>Chichester Harbour Conservancy</b>)</li> <li>• Pollution (<b>Chichester Harbour Conservancy</b>)</li> <li>• Housing should be of certain environmental standards</li> </ul>
<p>Transport:</p> <ul style="list-style-type: none"> <li>• Lack of public transport</li> <li>• Improvements to cycleways, including reference to NCN2 (<b>Sustrans</b>)</li> <li>• Impact on A259</li> <li>• Impact on A27 – suggest new junction</li> <li>• Parking issues</li> <li>• No mention of road upgrading (<b>Chidham &amp; Hambrook PC</b>)</li> </ul>
<p>Education:</p> <ul style="list-style-type: none"> <li>• Lack of capacity for new allocation (<b>Chidham and Hambrook Parish Council</b>)</li> <li>• Land for 2FE primary school should be provided (<b>WSCC</b>)</li> <li>• May be oversupply of school places within school planning area (<b>WSCC</b>)</li> <li>• Support relocation of school to north of Hambrook (<b>Harbour Villages Lib Dems Campaign Team</b>)</li> <li>• Unclear where early years places will be accommodated (<b>Chidham and Hambrook PC</b>)</li> </ul>
<p>Flooding:</p> <ul style="list-style-type: none"> <li>• Risk of flooding from sea level rises and surface water</li> </ul>
<p>Other:</p> <ul style="list-style-type: none"> <li>• Refer to Joint Minerals Local Plan and Waste Local Plan (<b>WSCC</b>)</li> <li>• Definition of affordable</li> <li>• Provision of housing for younger people</li> </ul>
<p>Omission sites:</p> <ul style="list-style-type: none"> <li>• Land at Cox's Barn Farm, Hambrook (<b>Genesis Town Planning obo Seaward Properties</b>)</li> </ul>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p> <p>The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified. Comments regarding landscape and ecological designations are noted.</p>

In March 2019 the *Revised Landscape Capacity Study* was produced which confirmed the assessment in the November 2018 study regarding the capacity for landscape change in the east-west corridor. The Preferred Approach Plan notes the potential landscape sensitivities, including protecting views to the South Downs National Park and Chichester Harbour Area of Outstanding Natural Beauty and their settings.

Therefore further consideration will need to be given to the capacity of this service village area to accommodate development, particularly with regards to landscape capacity and proximity to the sensitive environment of the AONB.

<b>Policy AL11 Hunston Parish</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 13	18	0	18	0
Policy: 107	145	4	121	20
Representation numbers				
<p>3500, 3492, 3491, 3488, 3484, 3483, 3475, 3474, 3473, 3472, 3471, 3470, 3469, 3468, 3467, 3466, 3465, 3464, 3463, 3453, 3451, 3450, 3449, 3448, 3447, 3446, 3445, 3444, 3443, 3442, 3441, 3440, 3439, 3438, 3437, 3436, 3435, 3387, 3369 (Landlink Estates Ltd), 3348 (CEG), 3300 (Church Commissioners of England), 3212, 3198, 3190, 3167, 3154, 3126, 2910, 2784 (Sussex Wildlife Trust), 2684 (Spiby Partners Ltd), 2678 (Devonshire Developments Ltd), 2667, 2508 (Hunston Parish Council), 2404, 2365 (West Sussex Local Access Forum), 2342, 2341, 2340, 2311 (Portsmouth Water Ltd), 2272 (Historic England), 2217 (Environment Agency), 2145/2133/2092 (West Sussex County Council), 1849, 1770, 1767, 1761, 1759, 1748, 1747, 1741, 1739, 1734, 1726, 1719, 1708, 1698, 1696, 1612, 1577, 1565, 1562, 1537, 1536 (Natural England), 1408, 1404, 1394, 1381, 1304, 1294, 1292, 1290, 1289, 1286, 1284, 1266 (North Mundham Parish Council), 1217, 1147 (British Horse Society), 1117, 1116, 1115, 1114, 1113, 1112, 1102, 1099, 1097, 1096, 1095, 1093, 1036, 1034, 996, 970, 949, 944, 934 (Pagham Parish Council), 920, 909, 903, 886, 828, 791, 783, 779, 759, 753, 736, 687, 673, 667, 664, 659, 612, 582, 581, 578, 563, 546, 501, 420, 419, 406, 359, 345, 255 (Sustrans), 237, 233, 230, 229, 222, 221, 220, 189, 181, 179, 176, 175, 152, 150, 149, 148</p>				
Summary of issues and key comments raised by residents and other respondents				
Support:				
<ul style="list-style-type: none"> <li>• General (<b>Church Commissioners for England</b>)</li> <li>• Support reference to Hunston Copse in 6.72 (<b>Sussex Wildlife Trust</b>)</li> <li>• Support provision of green infrastructure links (<b>WSLAF, British Horse Society</b>)</li> <li>• Support 6.77 in relation to respecting setting of listed buildings/conservation area (<b>Highways England</b>)</li> <li>• Support point 8 –provide attention to the quality of water run off to local ponds and low lying areas</li> </ul>				
Traffic Congestion:				
<ul style="list-style-type: none"> <li>• General concern re; existing and increased traffic from future development</li> <li>• Impossible to leave Manhood Peninsula; cannot take further traffic</li> <li>• Accident levels</li> <li>• Free School congestion</li> <li>• Install traffic lights outside Hunston Village Hall</li> <li>• Detrimental impact on B2145, overused already</li> <li>• Concern re; B2166/A27</li> <li>• Risk of danger from increased congestion</li> <li>• Roads have no capacity for future development</li> <li>• Prevents/slows access into and out of Hunston</li> <li>• Gridlock in the summer/peak times</li> <li>• Delays</li> <li>• Traffic mitigation proposals required</li> <li>• Congestion will be worsened from development in other parishes</li> <li>• Concern re; access for emergency services</li> </ul>				
Nature/wildlife/environment:				
<ul style="list-style-type: none"> <li>• General concern re; impact</li> <li>• Habitats will be destroyed particularly in Hunston Copse</li> <li>• Protect the Copse/Ancient Woodland</li> </ul>				

- Benefits must outweigh any adverse impact on biodiversity
- Impact on current wildlife corridors
- Impact on SAC/SPA/Ramsar sites
- Future development should incorporate wildlife enhancing features
- Policy incompatible with DM22, DM28, DM29 and DM30

**Pollution:**

- General concern
- Health impacts from poor air quality
- Stationary traffic increases pollution
- Increasing noise

**Funding:**

- Lack of S106 spend from current developments

**Allocation:**

- No further development, already at full capacity
- Not site specific (**Portsmouth Water Ltd**)
- Lack of evidence to support 200 (**Devonshire Developments Ltd**)
- Find alternative smaller sites
- Limit scale of housing along B2145 corridor
- Build on outskirts of village
- Lower numbers; more even distribution throughout District
- Reduce numbers to level that can be supported by current road infrastructure (**Pagham PC**)
- Limit to 100
- Limit to 80
- 35 identified in Local Plan
- Reduce to 50; allocate 150 to Runcton (**Landlink Estates Ltd**)
- N.Mundham to take higher numbers
- Concern re additional housing proposed by Arun DC
- Question deliverability through NP process (**CEG, Spiby Partners Ltd**)
- Build on brownfield
- Move allocation to north of District

**Specified alternative sites for development:**

- No building at end of Southover Way; build in field at main roundabout on B2145/B2166
- Do not develop field between Southover Way and Hunston Copse
- 2ha is available for 50 houses at Farmfield
- Build on fields just before new school
- Land at Reedbridge Farm (**Spiby Partners Ltd**)
- Old Hunston Dairy
- Chalder Farm
- Land behind public car park next to Hunter's Lodge riding school

**Housing:**

- Housing to integrate with village
- Too many empty properties already
- Lack of social/affordable housing
- Need social housing for rural people working in the countryside
- Unaffordable for young people; need starter homes/housing shared communal areas

- Low-rise accommodation for the elderly
- Smaller sized properties
- Housing mix to reflect neighbourhood plan
- Low-energy or PassivHaus design

#### Walking/Cycling

- Lack of infrastructure for non-motorised transport
- Preserve PROW
- Canal path unsuitable for travelling to school; requires improvement for pedestrians/cyclists
- Improve/provide more pedestrian pavements, provide lighting
- Complete gaps in footpath and cycle path networks
- Increase cycle paths to Chichester, Sidlesham and Selsey;
- Ensure safe pedestrian/cycle access generally across village
- Cycling and pedestrian paths from Hunston to Chichester along B2145
- Suggest bridleway link to S Mundham (with potential for future cycle links to Pagham and towards Bognor Regis) and to Sidlesham via golf course and Brimfast Lane would improve access to the countryside and services (**WSCC**)
- Off-road multi-use path network on Coastal Plain would be of great benefit to all NMUs (**British Horse Society**)

#### Transport

- Traffic calming
- Poor bus service; requires improvement
- Improve A27
- A27 improvements before development
- Implement northern A27 route
- No proposals included in policy to improve local road network (Pagham PC)
- No provision for impact of allocation on A259 and A27
- Deny access from proposed development down Church Lane
- Provide light rail link to Chichester
- Include park and ride facility off A27
- Lack of sustainable transport options
- Adequate parking necessary for development
- Discourage car use

#### Local Infrastructure/Services

- Generally insufficient
- Concern re; schools capacity
- Further school capacity required to accommodate development (WSCC)
- Concern re medical facilities capacity (GPs/Hospital)
- Impact on tourist industry
- Need new village hall, green and recreation area funded by developers
- Concern re capacity of local services/facilities
- Lack of local employment

#### Flood risk/WWTW capacity

- General concern re; waste water treatment capacity
- Increasing discharge consent headroom at Pagham not supported due to impacts on SPA/ Ramsar from allocation and Arun development (NE)
- Access to potential sites is across flood risk level 3 zones
- Low lying, concern re flooding with further development

- Sewers inadequate
- Surface water drainage and sewage overload already
- Install more drains
- Locate development solely in flood zone 1; allocation in 2 or 3 would need to be supported by L2 SFRA or equivalent (**Environment Agency**)

Character of Village:

- Will become an extension of Chichester
- Lose identity as village
- Concern re coalescence (**Hunston PC**)
- Impact on residents
- Change Hunston from “Service Village” to “Rest of Plan” area

Landscape:

- General concern re; impact
- Preserve greenfields
- Loss of views
- Loss of agricultural land
- Loss of green infrastructure/open space and play areas
- Impact on ancient woodland (**Hunston PC**)
- 15m margin to protect Hunston Copse is inadequate
- Development should not be sited near the conservation area/listed buildings
- Take into consideration Landscape Capacity Study of Nov 2018

Non-planning related issues:

- Repair roads
- Stop mineral extraction and lorry/tractor movements
- Provide public toilet and cash machine
- Increase bus services for school children; restrict private car use for pupil transport
- Increase parking at Free School
- Reduce bus fares

Changes to Plan policy text:

- 6.22 Chichester Canal LWS should also be mentioned (**Sussex Wildlife Trust**)
- 6.77 Insert new bullet point “Particular regard should be taken of the Chichester Free School, located near Hunston”
- Change point 2 of policy to “To meet specialised housing needs including accommodation for older and younger people”
- Change “minimum of 200” to “about 200” or “maximum” (**Hunston PC**)
- 6.77 should be incorporated into policy
- Policy para 7 add: “and that measurable net gains to biodiversity will be delivered” (**Sussex Wildlife Trust**)
- 6.77 mitigation impacts should include impacts on the B2166 to Pagham
- Specify types of housing in policy
- 6.77 include “enhancing biodiversity and habitat in Hunston”
- 6.78 add “and surrounding area” at end of sentence

Changes to Plan policy:

- Para 1 Replace “well integrated” with “adequately integrated”
- Para 6 delete “opportunities for the”
- Para 7 add “including ancient woodland” at end of sentence
- Para 8 change start to “Be planned with special regard to the need to avoid potential

impacts of recreational disturbance on ...” (**Sussex Wildlife Trust**)

- Para 9 should read “run-off into a designated site” and include waste water quality impacts (**Natural England**)
- Para 10 insert “education” after “infrastructure”
- Add to policy: “Demonstration that the development would not have an adverse impact on the significance of heritage assets including listed buildings or on the character or appearance of the Hunston Conservation Area” (**Historic England**)
- Need to refer to the Joint Minerals Local Plan and Waste Local Plan particularly safeguarding policies M9, M10 and W2; development at, adjacent or proximal to existing waste/mineral sites/infrastructure should be subject to consultation with WSCC (**WSCC**)
- Amend Policy to include protection of views to Chichester Cathedral Spire and Hunston Copse (**North Mundham PC**)
- Funding for improving Cycle route NCN88 and links between Chichester and Selsey need to be explicitly mentioned in policy (**Sustrans**)

Initial Council response to issues raised and way forward for the Local Plan Review

The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this proposed allocation development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment; and the Infrastructure Delivery Plan; along with the Sustainability Appraisal and Habitats Regulations Assessment.

The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

<b>Policy AL12 Land North of Park Farm, Selsey</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 2	2	0	2	0
Policy: 27	30	2	16	12
<p>Representation numbers  100, 2868 (Quod obo Thawscroft Ltd), 3372 (Landlink Estates Ltd), 1148 (British Horse Society), 2366 (West Sussex Local Access Forum), 2273 (Historic England), 1716, 2040 (Sussex Ornithological Society), 2014 (RSPB), 2787 (Sussex Wildlife Trust), 1539 (Natural England), 1268 (North Mundham PC), 1306 (Flood Action Group), 840, 830, 2337 (Southern Water), 738, 947, 3194, 2134 (WSCC), 2088 (WSCC), 2312 (Portsmouth Water), 2146 (WSCC), 1850, 1751, 1752, 2668, 1553, 1395, 2959, 2407, 2146 (WSCC), 1716, 547</p>				
<p>Summary of issues and key comments raised by residents and other respondents</p>				
<p>Support:</p> <ul style="list-style-type: none"> <li>Landlink suggest increasing allocation to 480 dwellings minimum and reduce allocations at East Wittering and Birdham (<b>Landlink</b>)</li> </ul>				
<p>Green Infrastructure:</p> <ul style="list-style-type: none"> <li>Support. Creating new routes and links on coastal plan with off road multi use path network.</li> </ul>				
<p>SPA /Ornithological considerations</p> <ul style="list-style-type: none"> <li>Development of 250 homes would be detrimental to SPA and bird populations, especially Brent Geese. Further studies required to identify sites used by Brent Geese.</li> <li>Is site deliverable in terms of the requirements of the Habitats Regulations.</li> </ul>				
<p>Flood Risk:</p> <ul style="list-style-type: none"> <li>Land at lowest point in Selsey and suffers from flooding/surface water drainage issues.</li> </ul>				
<p>Infrastructure:</p> <ul style="list-style-type: none"> <li>Education – further capacity required to accommodate development. Contributions and/or land sought from development.</li> <li>Make reference to Minerals and Waste Safeguarding as site within Sharp sand and gravel safeguarding area</li> <li>May need to reinforce water mains</li> <li>Sidlesham WWTW experiences capacity issues currently, exacerbated by groundwater infiltration.</li> <li>No consideration to employment.</li> </ul>				
<p>Transport:</p> <ul style="list-style-type: none"> <li>No provision made for road infrastructure impact of additional 250 dwellings onto B2145, A27 and A259.</li> <li>Need to refer to Selsey Greenway project.</li> </ul>				
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p>				
<p>The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this proposed allocation development, will be considered further through evidence studies, including updates to the water quality assessment; the strategic flood risk assessment; the transport assessment; and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified</p>				

<b>Policy AL13 Southbourne</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 8	8	0	3	5
Policy: 61	73	8	41	24
Representation numbers				
28, 107, 119, 208, 256 (Sustrans), 323, 358, 382, 383, 413, 437, 447, 709, 771, 774, 831, 842, 877, 957, 1040, 1149, 1204, 1213, 1363, 1420, 1541 (Natural England), 1556, 1727, 1754, 1859, 1874, 2015 (RSPB), 2037, 2050, 2055, 2093 (West Sussex County Council), 2098, 2099, 2132 (West Sussex County Council), 2158, 2159, 2210 (Environment Agency), 2215, 2231, 2274 (Historic England), 2287, 2313 (Portsmouth Water Ltd), 2338 (Southern Water), 2367, 2372, 2409 (South Downs National Park Authority), 2410, 2466 (Southbourne Parish Council), 2535, 2537, 2560, 2646, 2669, 2791, 2807, 2960, 3035, 3094, 3095, 3155, 3189, 3260 (WSCC (Estates)), 3263, 3286 (Westbourne Parish Council), 3295, 3302, 3336, 3350, 3393, 3397, 3400, 3404, 3493, 3498, 3501, 3504.				
Summary of issues and key comments raised by residents and other respondents				
Support in principle:				
<ul style="list-style-type: none"> <li>• Support overall policy or specific detail, support allocation, support GI.</li> </ul>				
Supporting text				
<ul style="list-style-type: none"> <li>• Strengthen supporting text eg may to should etc.</li> </ul>				
Infrastructure – General				
<ul style="list-style-type: none"> <li>• Inadequate provision of services and facilities (<b>Southbourne PC</b>)</li> <li>• Suggest change word “address” to “deliver” in first paragraph of Policy.</li> <li>• Concern re delivery, should be prior to construction (<b>Southbourne PC</b>)</li> <li>• Need community hall/centre (<b>Southbourne PC</b>)</li> <li>• Criteria 7, add "sports/youth facilities and retail units".</li> <li>• Concern over capacity of doctors' surgery (<b>Southbourne PC</b>)</li> </ul>				
Highways and transport				
<ul style="list-style-type: none"> <li>• Inadequate highway network (<b>Southbourne Parish Council</b>)</li> <li>• Include reference for account of any future potential new access on to A27.</li> <li>• Point 3, after "access to site(s)" add ", particularly non-vehicular,".</li> <li>• Limited employment = increased travel for residents; impacts transport infrastructure.</li> <li>• Suggest road parallel to Stein Road off A259 running north with bridge over railway line joining A27. Reduced allocation built along this road with no access to Stein Road to preserve existing village and no increase of traffic along Stein Road.</li> <li>• General concern over pollution and congestion (<b>Southbourne PC</b>)</li> <li>• New road bridge required as mitigation measure over railway line to support housing proposals and relieve future/present congestion – (<b>Westbourne Parish Council</b>)</li> <li>• Improve level crossing at Stein Road.</li> <li>• Concern re. railway station handling increased numbers from new development.</li> <li>• Point 4 to read “Improvements to the situation relating to various existing and planned railway crossings will be required as part of phased development”.</li> <li>• Lack of public transport.</li> </ul>				
Infrastructure - Sewage/water network				
<ul style="list-style-type: none"> <li>• Inadequate sewage/drainage systems (<b>Southbourne PC</b>).</li> <li>• Point 16 to read: “Ensure sufficient capacity within the sewer network and relevant Wastewater Treatment Works before the delivery of development as required” (<b>EA</b>)</li> <li>• Criteria 16 change “as required” to “as it is required”</li> </ul>				

<ul style="list-style-type: none"> <li>Confirm sufficient water resources in Portsmouth Water's area of supply, though local reinforcement of water mains may be required (<b>Portsmouth Water</b>)</li> </ul>
<p>Infrastructure - Schools/youth/early years</p> <ul style="list-style-type: none"> <li>Insufficient space within primary schools to serve proposed development. 2 FE expandable to 3 FE primary school required (<b>WSCC</b>)</li> <li>No early years' childcare or youth provision (<b>Southbourne PC</b>)</li> <li>Criteria 6 change "consideration" to "investigation"</li> </ul>
<p>AONB/ designated sites</p> <ul style="list-style-type: none"> <li>Protect; don't include in development options.</li> <li>Concern over erosion of setting of AONB and SDNP (<b>SDNPA</b>)</li> <li>AONB should be mentioned before the National Park; clarify meaning of "new views"</li> <li>Suggest point 9 reads same as Fishbourne policy (<b>SDNPA</b>)</li> <li>Amend point 12 to read: "Provide mitigation to ensure the avoidance of adverse effects on the SPA, SAC and Ramsar site ....."</li> <li>Proposed development on fringe of AONB, breaches AONB Management Plan; within SSSI Impact Risk Zone; impacts AONB long-distance views; urbanisation of countryside; inadequate landscaping and screening mitigation</li> <li>Protection of SPA, SAC and Ramsar site necessitates reinstatement of Ham Brook wildlife corridor (<b>Southbourne PC</b>)</li> <li>Concern potential sites conflict with legislation protecting designated sites (<b>RSPB</b>)</li> </ul>
<p>Wildlife</p> <ul style="list-style-type: none"> <li>Detrimental impact; inadequate survey data to support proposal.</li> <li>Biodiversity requirements are unambitious</li> <li>Point 11 add "and that measurable net gains to biodiversity will be delivered"</li> <li>Make reference in supporting text to Solent Wader and Brent Goose Strategy (<b>Natural England</b>), and Solent Recreation Mitigation Partnership (<b>RSPB</b>) areas should be avoided when allocating sites in NP.</li> </ul>
<p>Pollution</p> <ul style="list-style-type: none"> <li>Unavoidable increases of light, air, noise and soil pollution</li> </ul>
<p>Flood Risk</p> <ul style="list-style-type: none"> <li>Development to be located solely within Flood Zone 1 (<b>EA</b>)</li> <li>Southbourne is at or below 5m contour; at risk of flooding due to sea level rise – necessity for new development to be on higher ground</li> </ul>
<p>Transport Study</p> <ul style="list-style-type: none"> <li>Proposals not synchronised with transport study</li> <li>No account of traffic movements/ air quality travelling east during construction of Fishbourne roundabout</li> <li>11 additional zones added to accommodate proposed housing allocation though results fail to illustrate local traffic impact</li> <li>Propose new access point onto the A27</li> </ul>
<p>Cycling and walking</p> <ul style="list-style-type: none"> <li>Need provision for safe cycling and walking</li> <li>Include reference to South Coast National Cycle Network (NCN2). (<b>Sustrans</b>)</li> <li>Para 6.90 - Point 6 and Policy item 10 amend to "as well as the inclusion of cycling and pedestrian routes (in particular an integrated, segregated cycle route running between Chichester and Emsworth - sometimes referred to as the Chemroute);"</li> </ul>
<p>Housing delivery</p>

<ul style="list-style-type: none"> <li>• Enable multiple size-ranging sites dispersed across area to be considered</li> <li>• Houses concentrated in one area</li> <li>• Includes housing trajectory to ensure appropriate level of housing delivery in 0 - 5 year period and balanced delivery over remainder of plan period.</li> <li>• Concern re; delivery through NP and whether sites identification process will be completed by submission of plan <b>(RSPB)</b></li> <li>• Concern over increase in allocation number</li> <li>• Propose SPG for development West of Chichester</li> <li>• Increase to 3000 dwellings - propose east side of village for development</li> <li>• Concern over north-side of allocation, particularly cramped development, lack of greenspace, remote location and gas mains</li> <li>• Consistency (eg around 1,250 in text; minimum in policy)</li> <li>• End of first paragraph of policy add: "Development should be dispersed around the settlement to allow the phasing of well-integrated high quality sustainable urban extensions providing good access to facilities and sustainable forms of transport." and refer to "sites" rather than "site"</li> <li>• Criteria 2: add "disabled accommodation, first-time buyers, single-parent families"</li> <li>• Housing for younger people and shared communal areas.</li> <li>• Concern that housing will not be affordable for local people</li> <li>• All new housing should be carbon neutral; encourage renewable energy sources</li> </ul>
<p>Heritage Assets</p> <ul style="list-style-type: none"> <li>• Add to Policy AL13: "Demonstration that the development would not have an adverse impact on the significance of heritage assets, including listed buildings, or on the character or appearance of the Prinsted Conservation Area." <b>(Historic England)</b></li> </ul>
<p>Open Space/Green Belt/Green Infrastructure</p> <ul style="list-style-type: none"> <li>• Green space proposed in NP as part of "Green Ring" <b>(Southbourne PC)</b>. Incorporate into policy and secure funding from future development.</li> <li>• Loss of green belt.</li> <li>• Detrimental impact on green space.</li> <li>• GI requirements unambitious.</li> <li>• Change point 10 to "Expansion and provision of green infrastructure into the wider countryside."</li> <li>• Suggest point 10 reads: 'Identify opportunities and secure the expansion and provision of multifunctional green infrastructure into the wider countryside and protected landscapes of the South Downs National Park, and Chichester Harbour AONB, including between settlements and facilities.' <b>(SDNPA)</b></li> </ul>
<p>Agricultural land</p> <ul style="list-style-type: none"> <li>• Loss of open farmland</li> </ul>
<p>Settlement identity</p> <ul style="list-style-type: none"> <li>• Loss of settlement identity.</li> <li>• Detrimental impact upon quality of life in existing settlements, value of property etc.</li> </ul>
<p>Coalescence</p> <ul style="list-style-type: none"> <li>• Concern over coalescence with Hermitage/Emsworth and Chidham and Hambrook</li> </ul>
<p>Bourne Community College</p> <ul style="list-style-type: none"> <li>• Concern new development would compromise open outlook and rurality of school.</li> <li>• Incorporate improvements to Bourne College facilities <b>(Southbourne PCI)</b></li> </ul>

<ul style="list-style-type: none"> <li>• Concern over capacity.</li> </ul>
<p>Lack of employment</p> <ul style="list-style-type: none"> <li>• Employment opportunities limited.</li> </ul>
<p>Use classes</p> <ul style="list-style-type: none"> <li>• Flexible space for employment to include small-scale leisure use (<b>Southbourne PC</b>)</li> </ul>
<p>Propose site allocations</p> <ul style="list-style-type: none"> <li>• Land on Cooks Lane as identified in SHLAA and HELAA.</li> <li>• 3 sites at 139 Wayside, Main Road, Land adjacent to Newton, Inlands Road, and land at Gordon Road.</li> <li>• Promote land to north and west of Southbourne (69.3ha).</li> <li>• Propose land adjacent to Printhead Lane (<b>WSCC (Estates)</b>)</li> <li>• Suggest Land to the north of Gosden Green Southbourne /object to land in North.</li> <li>• Possible conflict as land proposed at Willowbrook Riding Centre (HSB0001) is located in Parish of Southbourne although forms part of Hambrook settlement.</li> <li>• Remove sites HSB0006 and adjacent plot HSB0007 from the plan.</li> <li>• Land west of Southbourne and south of railway line could be allocated as first phase so southern section of new link road is built to enable access to land to the north.</li> </ul>
<p>Initial Council response to issues raised and way forward for the Local Plan Review</p>
<p>The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this proposed allocation development, will be considered further through evidence studies, including updates to the water quality assessment; the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.</p> <p>In particular, confirmation is being sought on the overall need for school places and the requirement for a new primary school in this location. The next iteration of the Plan will reflect any update received from the County Council as Education Authority. This will inform the identification of any potential for a sports pitch at this location.</p> <p>In response to broader concerns regarding the impact of level crossings, PBA consultants included the impacts of level crossings as one of the sensitivity tests which is summarised in the document <i>Chichester District Local Plan Transport Study: Responses to Representations Received through the Consultation Process</i>. However, this work does not address whether a requirement for a new road bridge is justifiable in transport terms. Further work is being undertaken to test further if a new bridge can be justified in planning terms, and separately technical work on the feasibility of delivering a bridge to inform a delivery strategy going forward.</p> <p>The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.</p>

<b>Policy AL14: Land West of Tangmere</b>				
Respondents	Representations	Support	Object	Comment
Supporting Text: 4	4	0	2	2
Policy: 24	27	9	8	10
Representation numbers 3323 (Luken Beck obo Seaward Properties) 3226 (Henry Adams obo Pitts) 257 (Sustrans) 2901 (Savills obo Bloor Homes) 3303 (Church Commissioners) 1735 1693 (King & Co obo Heaver Homes) 2599 (Turleys obo Countryside Properties) 348 603 2275 (Historic England) 2339 (Southern Water) 604 2926 (CPRE Sussex) 2961 1412 (Tangmere Parish Council) 3197 2418 (South Downs National Park Authority) 603 2600 (Turleys obo Countryside Properties) 1411 (Tangmere Parish Council) 603 2135 (WSCC) 1638 832 2393 348 1638 3351 (Nexus Planning obo CEG) 337 2793 (Sussex Wildlife Trust) 326 2393 3550 2961 2368 (West Sussex Local Access Forum) 1150 (British Horse Society) 2339 (Southern Water) 2314 (Portsmouth Water) 2393				
Summary of issues and key comments raised by residents and other respondents				
Support Policy ( <b>Luken Beck obo Seaward Properties</b> ) ( <b>Henry Adams obo Pitts</b> ) ( <b>Savills obo Bloor Homes</b> ) ( <b>Church Commissioners</b> ) ( <b>King &amp; Co obo Heaver Homes</b> ) Potential to increase housing numbers within/adjacent to the allocation ( <b>Luken Beck obo Seaward Properties</b> ) ( <b>Turleys obo Countryside Properties</b> ) <ul style="list-style-type: none"> <li>• 7.6ha could come forward prior to allocation with independent access (<b>Henry Adams obo Pitts</b>)</li> <li>• Strategic policies should support approach to phased delivery of sites (<b>Savills obo Bloor Homes</b>)</li> <li>• Support opportunities for provision of GI links and improvements would comply with objectives of West Sussex Rights of Way Management Plan (<b>West Sussex Local Access Forum</b>) (<b>British Horse Society</b>)</li> </ul>				
Object <ul style="list-style-type: none"> <li>• Object to criteria 2 and 8 (<b>Savills obo Bloor Homes</b>)</li> <li>• Will significantly alter the nature of the village</li> <li>• Question size and deliverability of the allocation</li> </ul>				
Infrastructure <ul style="list-style-type: none"> <li>• Education – insufficient capacity/space to accommodate development, further consideration required to additional space to allow for expansion (<b>WSCC</b>)</li> <li>• Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of new infrastructure aligns with the occupation of the development as existing system unsustainable(<b>Southern Water</b>)</li> <li>• HAD and Housing could impact on source protection zone, the groundwater needs protecting (<b>Portsmouth Water</b>)</li> </ul>				
Amendments to policy wording <ul style="list-style-type: none"> <li>• Strengthen criterion 8 and include criteria on Conservation Area (<b>Historic England</b>) (<b>Turleys obo Countryside Properties</b>)</li> <li>• Include criteria on waste water (<b>Southern Water</b>)</li> <li>• Include provision of housing for younger people with shared communal areas</li> <li>• Replace reference to ‘planned’ with ‘masterplanned’ to make clear whole site and allocation will be masterplanned as a whole and that the precise number of dwellings will be determined through the masterplan (<b>Turleys obo Countryside Properties</b>)</li> <li>• Add education to list of benefits</li> <li>• Welcome criteria 5. Policy should be expanded to address sensitivity of site in terms of views from locations within SDNP (<b>South Downs National Park Authority</b>)</li> <li>• Clarify paragraph 6.95 to ensure consistent with strategic policies relating to retail development (<b>Turleys obo Countryside Properties</b>)</li> </ul>				

- Amend policy wording to refer to improvements to sustainable public transport services and links to Chichester City and the Five Villages and Barnham rail station (**Turleys obo Countryside Properties**)
- Make specific reference to noise mitigation measures for properties on A27 (**Turleys obo Countryside Properties**)
- Include extract from Tangmere Neighbourhood Plan in para 6.92 (**Tangmere PC**)
- Ensure NP approach does not hinder development by determining phasing – amend para 6.94 (**King & Co obo Heaver Homes**)
- 

#### Environmental considerations

- Lack of biodiversity requirements (**Sussex Wildlife Trust**) (**CPRE Sussex**)
- Consideration to be given to chalk stream priority habitat within the site (**Sussex Wildlife Trust**)

#### Initial Council response to issues raised and way forward for the Local Plan Review

The principle of development of the site was established in Policy 18 of the adopted Local Plan which allocated the site for mixed development comprising 1,000 homes, Community facilities, Open space and green infrastructure. Since then work has developed and it is considered that the site could deliver around 1,300 dwellings during the Plan period, together with supporting community facilities, open space and recreation, and infrastructure. The specific and cumulative infrastructure impacts, including any implications for the timing of delivery of this development, will be considered further through evidence studies, including updates to the water quality assessment (Including any necessary phasing of development); the transport assessment, and the Infrastructure Delivery Plan, along with the Sustainability Appraisal and Habitats Regulations Assessment.

It is thought that the policy should make more explicit the role of the masterplanning process to ensure the site is delivered in accordance with proposed policy S32.

The comments and issues raised in this consultation will be considered further in terms of whether any issues could be better reflected in the policy and amendments to the detailed policy wording would be justified.

<b>Policy AL15 Land at Chichester Business Park, Tangmere</b>				
Respondents	Representations	Support	Object	Comment
Policy: 3	1	0	0	1
Representation numbers				
2315 (Portsmouth Water)				
Summary of issues and key comments raised by residents and other respondents				
<p>Water supply:</p> <ul style="list-style-type: none"> <li>• Allocation likely to be within a Source Protection Zone for Aldingbourne public water supply abstraction (<b>Portsmouth Water</b>)</li> <li>• Need for caution when using infiltration systems e.g. deep bore systems (<b>Portsmouth Water</b>)</li> </ul>				
Initial Council response to issues raised and way forward for the Local Plan Review				
Further detailed discussions need to be held with Portsmouth Water, and if appropriate reference should be made to groundwater quality protection and Portsmouth Water's Groundwater Protection Guidance.				

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now part of



# Chichester District Local Plan Transport Study

Responses to Representations Received through the Consultation Process

On behalf of **Chichester District Council**



Project Ref: 43682 | Rev: - | Date: August 2019

## Document Control Sheet

**Project Name:** Chichester District Local Plan – Transport Study

**Project Ref:** 43682

**Report Title:** Responses to Representations Received through the Consultation Process

**Doc Ref:** 43682-PBA-XX-ZZ-TN-T

**Date:** August 2019

	Name	Position	Signature	Date
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<b>Reviewed by:</b>	Paul Gebbett	Senior Associate		June 19
<b>Approved by:</b>	Phil Brady	Director		June 19
<b>For and on behalf of Peter Brett Associates LLP</b>				

Revision	Date	Description	Prepared	Reviewed	Approved
A	16/08/19	Updates based on comments from client.	NM	PG	PB

This report has been prepared by Peter Brett Associates LLP ('PBA') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which PBA was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). PBA accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

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## Contents

- 1 Introduction ..... 1**
  - 1.1 Overview..... 1
  - 1.2 Clarification on Assumptions on growth in neighbouring authorities..... 1
- 2 WSCC and Highways England (HE) Representations ..... 18**
  - 2.1 Overview..... 18
  - 2.2 WSCC Representations ..... 18
  - 2.3 Highways England Representations ..... 18

## Tables

- Table 1: Table of Responses..... 2

## Appendices

- Appendix A Sensitivity Tests

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# 1 Introduction

## 1.1 Overview

- 1.1.1 Peter Brett Associates (PBA), now part of Stantec, has been commissioned to support Chichester District Council (CDC) to consider and respond to representations received by the Council during the Regulation 18 Consultation on the Local Plan Review (LPR).
- 1.1.2 This document addresses and provides responses to the representations. The document is accompanied by Appendix A, which is a supporting Technical Note where it is considered that the representation required further supporting modelling evidence. Appendix A provides the results of sensitivity tests, undertaken to complement the responses to specific representations.
- 1.1.3 Following this introduction, the representations are now addressed.

## 1.2 Clarification on Assumptions on growth in neighbouring authorities

- 1.2.1 CDC have posed the following and are seeking clarification from PBA: The PBA response follows thereafter:

*“We also seek clarification on the assumptions that have been made in the model to account for the planned quantum/spatial distribution of growth in Arun District and Havant Borough? Arun District have a recently adopted Local Plan (a ‘more than likely’ commitment in transport modelling terms) whilst Havant Borough Council have published their Regulation 19 LP and are moving towards submission (a ‘reasonably foreseeable’ commitment in transport modelling terms). It is not clear whether the use of Tempro sufficiently captures these levels of growth”*

- 1.2.2 PBA and CDC engaged neighbouring planning authorities and included agreed and known proposed development assumptions at the time that met the required criteria for inclusion in the modelling. Development not known at the time was accounted for within Tempro background growth. This is in line with standard industry practice and guidance. It is proposed that a review be undertaken to compare assumptions in the Uncertainty Log used to inform the Chichester LPR against assumptions in the now adopted Arun District Local Plan and in the published Regulation 19 LP for Havant. Should material changes be identified, it is proposed that the changes be included as part of the transport modelling to the Chichester Transport Study Update.

Table 1: Table of Responses

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
342, 454, 775, 872, 980, 1041, 1105, 1119, 1259, 1619, 1786, 1863, 1896, 2442, 2469, 2479, 3143, 3165, 3219, 3496, 3851, 945, 1663, 1049, 1546, 2046, (Luken Beck)	<b>General - transport study</b>	<b>General concerns on robustness of model</b> <ul style="list-style-type: none"> <li>Model incorrect, outdated and insufficiently robust. (980, 1105, 2046).</li> </ul>	The approach to model the potential highway impacts arising from development has followed procedures and processes set out in guidance produced by the Department for Transport (DfT), known as Transport Appraisal Guidance <sup>1</sup> (TAG). Particular reference is made to TAG Units M1-2 Data Sources and Surveys and M3-1 Highway Assignment Modelling.  An existing transport model, used to inform the adopted Local Plan (2014 to 2029), has been extended and updated (from a 2014 base year) to meet industry practice standards. This is in line with guidance within TAG Unit M3-1 Section 8.1 which states that:  “Trip matrices should not be taken from existing models unless the following conditions are met:  <input type="checkbox"/> the trips having both ends in the Fully Modelled Area which were derived from survey data were based on survey data which are less than six years old.”	N/A
980, 1105, 2046				
1105		<ul style="list-style-type: none"> <li>Traffic surveys are needed to fully understand and address the problems of access (1105)</li> </ul>	A variety of data sources and information was used to prepare and update the transport model, including data on traffic movements. The	N/A

<sup>1</sup> <https://www.gov.uk/guidance/transport-analysis-guidance-webtag>

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
			<p>resultant base model was considered to reasonably represent observed conditions at that time.</p> <p>The model used to inform the development of the transport evidence base is a strategic transport model that sets out the principles of proposed future development, its broad impacts and potential mitigation and does not consider each individual junction or access per se. Rather it sets out an overarching framework within which more detailed assessment of the impacts of individual development planning applications can be undertaken by way of a transport assessment.</p> <p>Therefore, more detailed assessments of the impacts of specific individual development will still need to be undertaken by prospective developers in support of their planning applications, including more detailed considerations of access arrangements for their development proposals.</p>	
775, 945, 1105, 2479, 3219		<ul style="list-style-type: none"> <li>No modelling for holidays/events (775, 945, 1105, 2479, 3219) including Manhood Peninsula (Luken Beck)</li> </ul>	<p>The modelling undertaken for the Local Plan Review and hence the mitigation thereof, was based on and designed to cope with average day to day network conditions in accordance with the DfT guidance. It is not considered practical, proportionate or economically feasible that the network or mitigation be based on unique events such as holiday/events.</p>	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
			In Chichester's case this could arise in the summer tourist season or when major events are held at Goodwood. For these types of assessment, which are regarded as infrequent occurrences for the purposes of this study, the Council would be required to carry out more localised studies and produce plans to manage traffic, rather than through provision of physical highway mitigation.	
2469		<ul style="list-style-type: none"> <li>Transport study has overly restrictive geographic scope (2469)</li> </ul>	<p>In addition to covering the area of the Adopted Local Plan (2014-2029), the Transport study has further expanded the model detail to include areas to the west and south of Chichester in order to accurately and robustly represent the potential highway impacts of the Local Plan Review development.</p> <p>The geographic area of the model has also been extended to areas of neighbouring authorities to provide a sufficient understanding of impacts within Chichester District and neighbouring local planning authorities, as is required for this process.</p>	N/A
1619		<ul style="list-style-type: none"> <li>The current proposals only take into account traffic growth from the development and not additional through traffic. (1619)</li> </ul>	<p>The forecasting approach used to estimate future traffic followed industry standard guidance.</p> <p>The approach takes into account trips from known committed development in Chichester District and neighbouring authorities, as well as making assumptions about future background</p>	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
			<p>traffic growth from a wider area which takes account of projected increases in housing and job numbers, along with other factors that may affect travel.</p> <p>To conclude, the transport study has robustly taken into account potential future traffic growth in the Local Plan Review area and beyond, in line with current forecasting practice guidance.</p>	
2717		<ul style="list-style-type: none"> <li>the effects of induced demand" (Section 4.2.2) are ignored and instead "a fixed demand approach has been used" (Section 4.2.5). The Local Plan Review is therefore not robust (2717)</li> </ul>	<p>Department for Transport guidance advocates that transport models should be proportionate and built to meet the purposes for which they are required.</p> <p>For the purposes of the Local Plan Review, it was considered disproportionate in this instance to undertake Variable Demand Modelling (VDM). The main purpose of the modelling in this case, is to get a sufficiently detailed but proportionate understanding of the impacts of the Local Plan Review development and the mitigation thereof.</p> <p>A fixed demand approach was considered appropriate so that the impact of the proposed development could be clearly assessed between scenarios without the impacts of other variables that might be introduced by a VDM approach. The modelling used has also maintained consistency with that used to inform the Adopted Local Plan.</p>	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
1786		<ul style="list-style-type: none"> <li>Model has a fixed Trip matrix. This means that there will be further peak traffic spreading into off-peak periods from unfinished trips in peak hours not modelled. This will result in longer periods of congestion and corresponding costs and environmental issues. What is the impact of this? (1786)</li> </ul>	<p>The transport model represents average weekday conditions for the AM Peak hour (0800-0900), the PM peak hour (1700-1800) and average inter-peak hour for the period 1000-1600.</p> <p>The issue of peak traffic 'spreading' (either through deliberate decisions by drivers to travel outside of typical peak hours or as a result of increased congestion causing traffic to be delayed) has not been explicitly modelled. However modelling has followed industry standard guidelines and represents the predicted worst AM and PM congested hours. It would be disproportionate to model the AM and PM peak period shoulders as well.</p> <p>The model in a proxy way accounts for the fact that not all the demand within the modelled AM and PM periods is able to get through the network during the modelled hours. Some traffic could be held up within queues at junctions or congested parts of the network and so only some traffic will be able to get through the network.</p> <p>The model outputs therefore distinguish between what is known as 'Demand' traffic or flows, representing the full Demand traffic wishing to travel through the network and 'Actual' traffic flows representing traffic that actually manages to get through the network.</p>	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
			<p>Actual flow in congested periods will be less than demand flow with the difference representing traffic still held up in queues as suppressed demand.</p> <p>It is unlikely that sufficient highway capacity could practically be provided in congested peak hours to eliminate suppressed demand entirely.</p> <p>Travel behaviour changes encouraging drivers to travel at less congested times is seen as a plausible and viable way to efficiently use available capacity. This active behaviour by some drivers to avoid the worst congested periods has not been modelled and hence the level of suppressed demand estimated by the current modelling approach is likely to be an overestimate.</p> <p>Appendix A of this technical note has reported on a sensitivity test on 'passive' peak spreading by comparing Demand and Actual flows where it is seen that there is suppressed demand in the AM and PM peak hours but less so or none in the IP where demand is considerably less.</p>	
1786		<ul style="list-style-type: none"> <li>Insufficient evidence of and weight given to sustainable transport in a 'transport study'; which is essentially a traffic study. (1786)</li> </ul>	<p>Sustainable transport measures have been considered in Section 11 of the PBA report. Considerable effort was been placed on seeking realistic, affordable, viable and feasible solutions that could potentially be implemented within the Local Plan Review period.</p>	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
			<p>It should be noted that the mitigation assumed has been based on a 5% reduction in projected demand for journeys made by private car compared to what would otherwise be expected to be generated. This reduction is based on the assumption that there is a plausible prospect of this reduction being realised through ‘smarter’ travel options leading to increased use of sustainable travel options.</p> <p>A consideration of sustainable solutions has been accounted for through demand reduction assumptions that realistically reflect current known travel behaviour regarding uptake of sustainable travel such as public transport and active modes such as cycling. Going forwards it is anticipated that sustainable travel solutions will become increasingly important and attainable, but it would have been unrealistic given current understanding of travel behaviour to assume that the LPR development would predominantly be mitigated by sustainable travel solutions.</p>	
3581		<ul style="list-style-type: none"> <li>Any further work by PBA or any other consultant must take account of the Systra consultation. (3581)</li> </ul>	<p>The work by SYSTRA “Build A Better A27 Study” was considered and summarised in Section 2 of the PBA report.</p> <p>Highways England announcement of RIS2 in October 2018 did not include Chichester bypass, and given the lack of certainty at this time as to</p>	

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
			any scheme, it would be difficult to include such matters in this study. However, this would need to be considered at a later date if and when the position changes.	
3165		<ul style="list-style-type: none"> <li>found the Peter Brett document both obscure and contradictory, and lacking in coherence (3165)</li> </ul>	The document has been prepared following standard industry/practice and guidance. It is noted that the document is of a technical nature and may be so perceived by some readers. Efforts have been made to communicate complex technical issues in the document using language that is accessible to as many people as possible.	N/A
1786	<b>Specific queries re assumptions used</b>	<ul style="list-style-type: none"> <li>Why has the approved and programmed Arundel bypass scheme not been included in the transport model? This scheme will increase the traffic problems on the Chichester bypass and encourage additional rat-running on local roads. (1786)</li> </ul>	<p>At the time of the study, the Arundel Bypass was not known to be a committed scheme.</p> <p>Appendix A of this Technical Note reports on a sensitivity test considering the potential traffic impacts with the Arundel Bypass in place.</p>	N/A
1786		<ul style="list-style-type: none"> <li>Why has the A27 Fishbourne Roundabout “Hamburger” scheme not been included in 2035 Reference Case? (1786)</li> </ul>	A27 Fishbourne Roundabout “Hamburger” scheme was included in the 2035 Reference Case model as it is a committed scheme in the Adopted Local Plan. It is mentioned in Table 5.3 of the PBA report.	N/A
1786		<ul style="list-style-type: none"> <li>Why include only Phase 1 (750 houses) for White Horse Farm? Why not 850 for Phase 2? (1786)</li> </ul>	The Phase 1 dwellings of 750 units were explicitly included in the Reference Case. Phase 2 is not expected to be built out until much later in the Plan Period. The potential highway impacts of this development were therefore	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
			<p>modelled through assumed background levels of growth which is included within the vicinity of the likely development and therefore would be considered in flows on the network at a strategic level.</p> <p>Therefore, at a strategic level this growth would be included. It is also important to note that this development is part of the Reference Case ('policy off') and does not therefore affect the quanta of development tested ('policy on') to inform the Local Plan Review, its impacts and mitigation thereof.</p>	
1786		<ul style="list-style-type: none"> <li>• Re the southern access road from Phase 2 of White Horse Farm - What is assumed / proposed? Sherborne Road/Westgate mini roundabout - stated by developer has insufficient capacity to manage their Phase 2 development (+ 850 dwellings). What has been modelled? (1786)</li> </ul>	<p>There are localised highway mitigation measures that have been modelled at a strategic level to accommodate future demands in this part of the network. This includes proposed mitigation improvements to the A27 Fishbourne Roundabout as part of the A27 Chichester Bypass mitigation. Within the Chichester City highway network, mitigation is proposed for the Via Ravenna/Cathedral Way Roundabout (Junction 8 in the PBA report in Section 7.4), while mitigation is also proposed at the A286 Stockbridge Road/Terminus (Junction 9) and at the A259 Cathedral Way/Fishbourne Road/Terminus Road junction (Junction 10). These improvements in this part of the network provide the strategic mitigation to accommodate future plan demands although it is expected that further mitigation specific to the development itself will need to be addressed by the developers as part of the planning application process.</p>	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
1896	<b>Proposed mitigation</b>	<ul style="list-style-type: none"> <li>Routes considered for mitigation not considered equally (1896)</li> </ul>	<p>As noted in Section 7.2 of the PBA Transport Study report, mitigation was considered in four parts as follows:</p> <p>Part 1: A27 Corridor Part 2: Chichester City Part 3: Wider Chichester Area Part 4: Neighbouring Local Authorities</p> <p>This made it possible to consider mitigation for the Local Plan Review area and neighbouring authorities. Given the strategic nature and importance of the A27 Chichester Bypass to the success of the LPR, considerable effort was expended in identifying effective but affordable mitigation solutions on the A27 given budget constraints of mitigation that could feasibly be implemented over the LPR period to 2035 with a contingency to 2036 to account for any project slippage.</p>	N/A
		<ul style="list-style-type: none"> <li>Mitigation should be modelled for scenarios 2/3 to inform appraisal of alternative spatial options (Luken Beck)</li> </ul>	<p>Mitigation modelled for Scenario 1 was also modelled in Scenarios 2 and 3 and the outputs for Scenarios 2 and 3 are given in Appendices B and C respectively of the PBA report. Table 9.15 of the PBA report also sets out a summary of the junction improvements and which scenario each improvement accommodates.</p>	N/A
1863		<ul style="list-style-type: none"> <li>Background study does not explore medium- and long-term transport infrastructure – this is unacceptable</li> </ul>	<p>The remit of the study was to explore feasible and affordable mitigation to accommodate the Local Plan Review demands to 2035 with a</p>	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
		when the LP will last until 2035. (1863).	contingency to 2036. The sustainable solutions in Chapter 11 of the PBA report on Sustainable Transport Solutions provides an overview of solutions that could be considered in the medium to long term as an alternative or complementary mitigation measures to the junction schemes in the Chichester plan area.	
454,872,1663		<ul style="list-style-type: none"> <li>Increased journey times based on restricted right turns on Stockbridge should be included in consultants' calculations in Appendix F (454, 872, 1663)</li> </ul>	The journey times that have been analysed and presented in Appendix F take into account any impacts due to restricted right turns at Stockbridge and Whyke.	N/A
3581		<ul style="list-style-type: none"> <li>Redo analysis of traffic flows with right hand turns off A27 in place, taking account of local traffic needs and analyse more accurately the conflict arising from PBA's non-separation of through and local traffic and whether their proposals will accommodate the additional traffic. (3581)</li> </ul>	A sensitivity test has been undertaken with right hand turns off A27 in place and the flow changes are depicted in a Technical Note included as Appendix A to this document.	N/A
1259		<ul style="list-style-type: none"> <li>Nothing in Plan to address congestion caused by railway crossings (1259)</li> </ul>	This has been considered and reported in Technical Note Appendix A.	N/A
3496	<b>Specific geographies within plan area</b>	<ul style="list-style-type: none"> <li>Not appraised impacts on A259 (3496)</li> </ul>	The PBA report provides network flow plots and other outputs to enable an understanding of impacts throughout the network including the A259. Appendix K of the PBA report also undertook some more localised analysis of impacts in the A259 and elsewhere.	N/A
1863		<ul style="list-style-type: none"> <li>No detail of how large developments</li> </ul>	As a strategic model, it has generally been	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
		along A259 will access A27 which is already at full capacity (1863)	<p>assumed that development along the A259 corridor will load onto the wider network via the A259. More detailed consideration of access will be considered by developers in their Transport Assessments in support of their planning applications.</p> <p>The transport study considered in principle the mitigation required to mitigate the impacts of the Local Plan Review, including mitigation of the A27 Chichester Bypass. It did not consider specific access arrangements for development, this being issues for future planning applications and transport assessments.</p>	
342, 2469		<ul style="list-style-type: none"> <li>Study has not sufficiently appraised impacts in Southbourne area, particularly relating to congestion at railway crossing &amp; associated air quality at peak times (including schools). (342, 2469)</li> </ul>	Railway crossing impacts are reported in Technical Note Appendix A.	N/A
342		<ul style="list-style-type: none"> <li>Concerned about in-combination impacts on surrounding area including Westbourne. (342)</li> </ul>	<p>The modelling work undertaken assessed the cumulative impacts of all developments and the flow plots provided show this impact within the study area.</p> <p>The PBA report provides network flow plots and other outputs to enable an understanding of impacts throughout the network including around Westbourne.</p>	N/A
1119		<ul style="list-style-type: none"> <li>Impact of additional traffic on Clay Lane, Fishbourne should be assessed</li> </ul>	The proposed mitigation is projected to reduce rat-running trips from Clay Lane in general,	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
		<p>given its use in east-west corridor as a way to avoid A27 roundabouts. (1119)</p>	<p>compared to what is projected to otherwise be the case without the mitigation.</p>	
2442		<ul style="list-style-type: none"> <li>• Not clear what impact Scenario 1 from transport model will have on A286 which may impact on junction capacity</li> </ul>	<p>The PBA report provides network flow plots and other outputs to enable an understanding of impacts throughout the network including the</p>	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
		- may seek further assurances. (2442)	A286. A check of the volume to capacity ratios on junctions on the A286 generally indicates that the junctions operate within the acceptable band of no worse than 105% with most of them operating below 100% in both the AM and PM peak hours.	
980, 1041,1061	<b>Stakeholder engagement</b>	<ul style="list-style-type: none"> <li>No evidence of sufficient consultation with Highways England (980, 1041, 1061)</li> </ul>	<p>Highways England were consulted at regular intervals during the course of the study and they reviewed the study documents including the LMVR, and the PBA report as part of their review of the technical work and modelling.</p> <p>As a statutory consultee regarding the Strategic Road Network i.e. the A27, Highways England have themselves had the opportunity to make representations. We note in particular the following wording from Highways England's submitted representations: –</p> <p><i>“To support the revised housing supply for the new plan period Peter Brett Associates were employed to update the existing strategic transport model and apply the proposed strategic development options. Highways England and West Sussex County Council were closely involved with the Transport modelling work and the reference and future case scenarios have been accepted by both Highway Authorities”</i></p> <p>Furthermore, Highways England in concluding their representations, state: –</p> <p><i>“Overall, Highways England are, at this point in</i></p>	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
			<p><i>the plan making process, satisfied that the full package of highways proposals as outlined in the PBA report 'Transport Study of Strategic Development Options and Sustainable Transport Measures' will mitigate the adverse impacts of the Local Plan review on the Strategic Road Network."</i></p>	
3143		<ul style="list-style-type: none"> <li>• Not working effectively with WSCC (3143)</li> </ul>	<p>In relation to the development of the highway model and the use of this to inform the Local Plan Review study, we liaised with WSCC in model development, LMVR and also throughout the study in relation to technical elements, project progress meetings, review of the PBA study report and took into account WSCC's technical comments.</p> <p>We note the following wording from the Council as part of its representations under 'Connectivity and Sustainable Travel': –</p> <p><i>"The County council has worked with the District Council on the preparation of the transport evidence base study undertaken by Peter Brett Associates for the District Council. The recommended transport mitigation strategy, as assessed using the Chichester Area Transport Model has been demonstrated to be capable in principle to prevent the development from resulting in severe residual cumulative impacts on the highways and transport network. However, the recommended strategy has several risks to deliverability and acceptability associated</i></p>	N/A

Resp. ID	Policy/Paragraph	Summary	Recommended response	Proposed change
			<i>with it, which require further work to be undertaken to demonstrate that the strategy can be implemented in its current form to provide the forecasted mitigation to travel conditions.”</i>	
3143		<ul style="list-style-type: none"> <li>Local communities not always included (3143)</li> </ul>	CDC has engaged with local communities in the preparation of its Local Plan Review to date, and will continue to do so.	N/A

## **2 WSCC and Highways England (HE) Representations**

### **2.1 Overview**

2.1.1 This section gives consideration West Sussex County Council's (WSCC) and Highways England's representations, in so far as they relate to the LPR study undertaken by PBA. They do not consider the broader issues raised by these consultees outside of the PBA remit.

### **2.2 WSCC Representations**

2.2.1 The pertinent representations for which PBA consider the need for a response relate to The County's representations on Connectivity and Sustainable Travel. PBA is generally in agreement with the Council's comments.

### **2.3 Highways England Representations**

2.3.1 Highways England's representations generally agree with the findings of the PBA transport study as has been quoted in our responses to representations pertaining to stakeholder engagement in Table 1 above. Having reviewed the HE representations, PBA are in agreement with Highways England's representations and have no further comments to make.

## **Appendix A    Sensitivity Tests**



now part of



# Chichester Local Plan - Transport Study

## Chichester Local Plan – Consultation responses, sensitivity tests

On behalf of **Chichester District Council**



Project Ref: 43682 | Rev: A | Date: August 2019

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## Document Control Sheet

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**Report Title:** Chichester Local Plan – Consultation responses, sensitivity tests

**Doc Ref:** 43682-PBA-XX-ZZ-TN-0009

**Date:** 27/06/2019

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<b>For and on behalf of Peter Brett Associates LLP</b>				

Revision	Date	Description	Prepared	Reviewed	Approved
A	16/08/19	Update of note to take into account comments from local authorities.	LP	NM	PB

This report has been prepared by Peter Brett Associates LLP ('PBA') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which PBA was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). PBA accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

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## Contents

<b>1</b>	<b>Sensitivity Tests</b> .....	<b>6</b>
1.1	Overview .....	6
1.2	Sensitivity Tests .....	6
1.3	Technical Note Structure .....	6
1.4	Overview .....	6
1.5	Impact due to level crossing closures .....	7
1.6	Impact of Arundel bypass .....	14
1.7	Impact of Peak Spreading .....	17
1.8	Impact of Allowing right turns at A27 junctions and on local traffic .....	22
1.9	Summary .....	31

## Figures

Figure 2.2.1	Location of level crossings – North of A259 .....	8
Figure 2.2.2	Location of level crossings – Chichester city centre .....	9
Figure 2.3.1	Arundel bypass option 5A .....	15
Figure 2.5.1	AM peak hour (0800-0900) Flow Difference Allowed – Banned right turns .....	25
Figure 2.5.2	IP peak hour (1000-1600) Flow Difference Allowed – Banned right turns .....	26
Figure 2.5.3	PM peak hour (1700-1800) Flow Difference Allowed – Banned right turns .....	27
Figure 2.5.4	AM peak hour (0800-0900) Flow Difference Allowed – Banned right turns .....	28
Figure 2.5.5	IP peak hour (1000-1600) Flow Difference Allowed – Banned right turns .....	29
Figure 2.5.6	PM peak hour (1700-1800) Flow Difference Allowed – Banned right turns .....	30

## Tables

Table 2.2.1	AM peak hour (0800-0900) delays .....	11
Table 2.2.2	IP peak hour (1000-1600) delays .....	12
Table 2.2.3	PM peak hour (1700-1800) delays .....	13
Table 2.3.1	AM Peak Hour (0800-0900) Flows on main links .....	16
Table 2.3.2	PM Peak Hour (1700-1800) Flows on main links .....	17
Table 2.4.1	A27 Chichester bypass AM peak hour (0800-0900) Difference Between Actual and Demand flows .....	19
Table 2.4.2	A27 Chichester bypass IP hour (1000-1600) Difference Between Actual and Demand flows	20
Table 2.4.3	A27 Chichester bypass PM hour (1700-1800) Difference Between Actual and Demand flows	21
Table 2.4.4	Over Capacity Queues for assessed peak hour (PCU HRS/HR) .....	22
Table 2.4.5	Over Capacity Queues next time peak hour (PCU HRS/HR) .....	22

## Appendices

- Appendix A1 Impact to Level Crossings
- Appendix A2 Impact of Arundel Bypass
- Appendix A3 Impact of Peak Spreading
- Appendix A4 Impact of Allowing Right Turns at A27 Junctions and on Local Traffic

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# 1 Sensitivity Tests

## 1.1 Overview

- 1.1.1 Peter Brett Associates (PBA), now part of Stantec, has been commissioned to undertake a transport assessment to inform the preparation of the Chichester Local Plan Review (LPR) 2016-2035.
- 1.1.2 For the purpose of informing this Local Plan Review, computer modelling has been used to analyse the complex transport patterns that already take place in the area. The Chichester Area Transport Model (CATM) has been updated by PBA to investigate travel patterns in and around the Chichester area.
- 1.1.3 During the course of the Local Plan Regulation 18 Consultation, representations have been made by various stakeholders, and those pertaining to the highway modelling and the outputs presented, have been received from Chichester District Council (CDC)
- 1.1.4 The responses to the representations are provided in a separate technical note and in order to address some of the comments received satisfactorily, PBA have undertaken four sensitivity tests.

## 1.2 Sensitivity Tests

- 1.2.1 The sensitivity tests have been undertaken to provide further evidence and understanding on the following issues raised within the representations:
- Impact of additional flows at level crossings within the study area;
  - Impact of the Arundel bypass;
  - Impact of peak spreading; and
  - Impact of allowing right turns at A27 junctions and impact on local traffic.
- 1.2.2 The Scenario 1 SATURN models were used to undertake the sensitivity tests
- 2035 with Local Plan Development Scenario 1 (650 dwellings per annum (dpa)) – 4,900 dwellings for the period 2016 – 2035, with a contingency to 2036.
- 1.2.3 The model consists of an AM peak hour model (08:00 to 09:00), an average Inter Peak hour model (10:00 to 16:00) and a PM peak hour model (17:00 to 18:00).

## 1.3 Technical Note Structure

- 1.3.1 The remainder of this Technical Note is structured as follows:
- Sensitivity Tests are discussed in Sections 2;
  - Conclusions are given in Section 3.

## 1.4 Overview

- 1.4.1 A series of sensitivity tests were undertaken in order to provide further evidence on the issues raised within the representations received from CDC.

1.4.2 The sensitivity tests are the following:

- Impact due to level crossing closures;
- Impact of Arundel bypass;
- Impact of peak spreading; and
- Impact of allowing right turns at A27 junctions and on local traffic.

## 1.5 Impact due to level crossing closures

1.5.1 This sensitivity test was undertaken in order to respond to comment 1259 to understand the impact of the level crossings on the network nearby.

*“Nothing in Plan to address congestion caused by railway crossings”*

1.5.2 Within the study area, nine level crossings were identified and examined, these are shown on Figures 2.2.1 and 2.2.2 and are as follows:

### North of A259

- Salthill Road;
- B2146 Ratham Lane;
- Newells Lane;
- Broad Road;
- Inlands Road; and
- Stein Road

### Chichester City

- Stockbridge Road;
- Basin Road; and
- Whyke Road.

Figure 2.2.1 Location of level crossings – North of A259

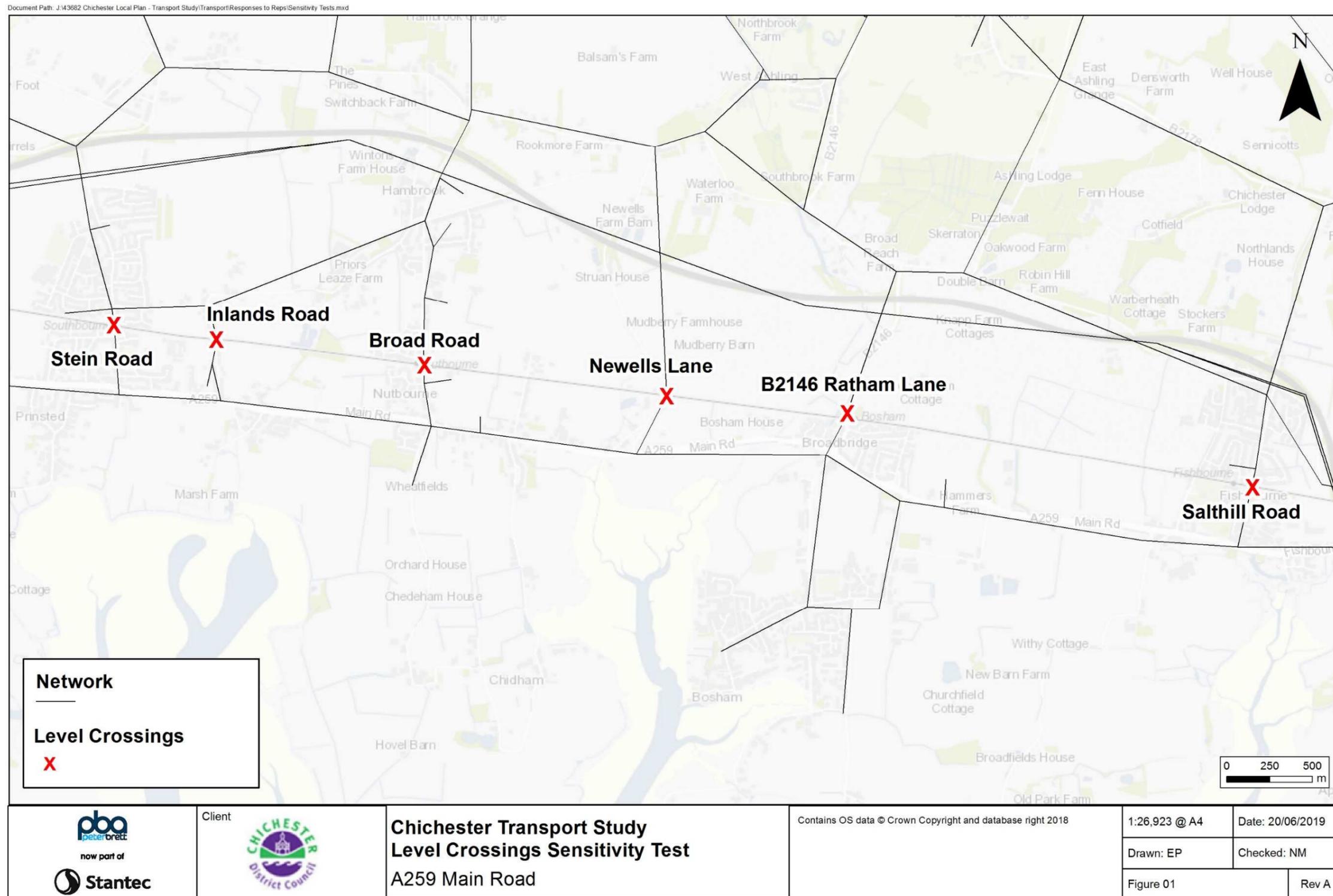
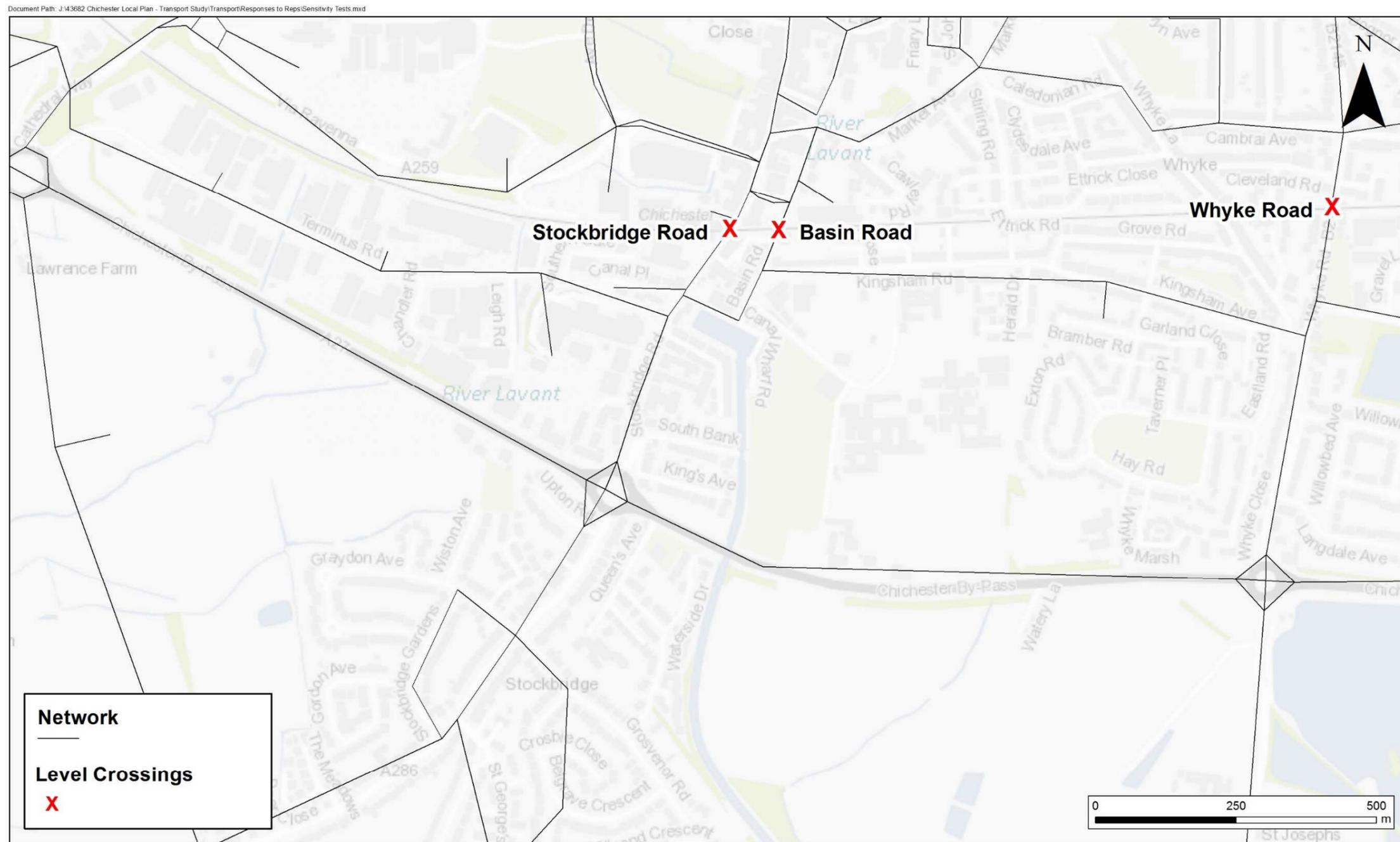


Figure 2.2.2 Location of level crossings – Chichester city centre



Page 158

 now part of 	<p>Client</p>	<p><b>Chichester Transport Study</b> <b>Level Crossings Sensitivity Test</b> Chichester</p>	Contains OS data © Crown Copyright and database right 2018		1:8,615 @ A4	Date: 20/06/2019
					Drawn: EP	Checked: NM
					Figure 01	Rev A

- 1.5.3 Within the transport model, each level crossing is represented by a signalised node. This represents the 'junction' of the railway line and the road with the signalisation making it possible to simulate vehicles stopping when a train passes the level crossing.
- 1.5.4 The signalised nodes for the level crossings, were set up to effectively represent the number of minutes in the hour that the crossing is closed, but using a standard cycle time as per traffic signals, resulting in a higher number of shorter closures than actually occur.
- 1.5.5 In order to assess the impact, we examined the area adjacent to each level crossing by checking the performance of the level crossing, specifically the delays at the level crossing (seconds), comparing the 2035 Scenario 1 model with mitigation against the 2035 Reference Case and the 2014 Base model.
- 1.5.6 Plots showing outputs from the modelling are provided in Appendix A1.
- 1.5.7 Tables 2.2.1 to 2.2.3 provide a delay comparison for the AM, IP and PM peaks at each of the level crossings within the study area.
- 1.5.8 In summary, in the AM peak, the results suggest that most of the level crossings on the A259 Main Road (i.e. outside Chichester City) are predicted to maintain similar levels of delays generally seen in the base year, with the mitigation in place. However, the three level crossings in Chichester City are generally predicted to show delays greater than those in the base and in the Reference Case. These trends are seen to be generally mirrored in the IP and PM peaks as well.
- 1.5.9 The delays are generally shown to be relatively small and do not have any impact on route choice within the model. It should be noted however, that the model demonstrates what would happen based specifically on delay changes and will not model changes due to a greater perception of delay at the level crossings, which may influence some drivers to divert on to alternative routes.
- 1.5.10 It is also based on average-delays per vehicle and will not represent the effects of occasional longer delays, which may have a wider area of impacts.

Table 2.2.1 AM peak hour (0800-0900) delays

AM										
Road Name	Direction	2014 Base	2035 Reference Case	Difference Between Base and Reference Case	2035 Scenario 1	Difference Between Base and Scenario 1	Difference Between Reference Case and Scenario 1	2035 Scenario 1 with mitigation	Difference between Base and Scenario 1 with Mitigation	Difference Between Reference Case and Scenario 1 with Mitigation
Salthill Rd	NB	52	51	-1	51	-1	0	49	-3	-2
	SB	48	49	1	63	15	14	47	-1	-2
B2146 Ratham Ln	NB	47	47	0	53	6	6	47	0	0
	SB	46	47	1	46	0	-1	49	3	2
Newells Ln	NB	46	46	0	46	0	0	46	0	0
	SB	46	46	0	46	0	0	46	0	0
Broad Rd	NB	47	47	0	47	0	0	47	0	0
	SB	46	47	1	46	0	-1	47	1	0
Inlands Rd	NB	46	46	0	46	0	0	46	0	0
	SB	46	49	3	47	1	-2	48	2	-1
Stein Rd	NB	54	56	2	54	0	-2	55	1	-1
	SB	62	65	3	63	1	-2	64	2	-1
Stockbridge Rd	NB	51	46	-5	46	-5	0	46	-5	0
	SB	53	46	-7	46	-7	0	46	-7	0
Basin Rd	NB	56	72	16	85	29	13	91	35	19
	SB	54	61	7	77	23	16	70	16	9
Whyke Rd	NB	60	70	10	74	14	4	82	22	12

Table 2.2.2 IP peak hour (1000-1600) delays

IP										
Road Name	Direction	2014 Base	2035 Reference Case	Difference Between Base and Reference Case	2035 Scenario 1	Difference Between Base and Scenario 1	Difference Between Reference Case and Scenario 1	2035 Scenario 1 with mitigation	Difference between Base and Scenario 1 with Mitigation	Difference Between Reference Case and Scenario 1 with Mitigation
Salthill Rd	NB	48	51	3	52	4	1	51	3	0
	SB	48	48	0	48	0	0	48	0	0
B2146 Ratham Ln	NB	46	46	0	46	0	0	46	0	0
	SB	46	46	0	46	0	0	46	0	0
Newells Ln	NB	46	46	0	46	0	0	46	0	0
	SB	46	46	0	46	0	0	46	0	0
Broad Rd	NB	46	46	0	46	0	0	46	0	0
	SB	46	46	0	46	0	0	46	0	0
Inlands Rd	NB	46	46	0	46	0	0	46	0	0
	SB	46	46	0	46	0	0	46	0	0
Stein Rd	NB	51	52	1	52	1	0	52	1	0
	SB	51	52	1	53	2	1	52	1	0
Stockbridge Rd	NB	55	46	-9	46	-9	0	46	-9	0
	SB	52	46	-6	46	-6	0	46	-6	0
Basin Rd	NB	52	69	17	64	12	-5	75	23	6
	SB	54	76	22	76	22	0	86	32	10
Whyke Rd	NB	57	64	7	62	5	-2	67	10	3
	SB	63	88	25	94	31	6	79	16	-9

Table 2.2.3 PM peak hour (1700-1800) delays

PM										
Road Name	Direction	2014 Base	2035 Reference Case	Difference Between Base and Reference Case	2035 Scenario 1	Difference Between Base and Scenario 1	Difference Between Reference Case and Scenario 1	2035 Scenario 1 with mitigation	Difference between Base and Scenario 1 with Mitigation	Difference Between Reference Case and Scenario 1
Salthill Rd	NB	50	52	2	55	5	3	53	3	1
	SB	50	49	-1	49	-1	0	50	0	1
B2146 Ratham Ln	NB	46	47	1	47	1	0	47	1	0
	SB	46	46	0	47	1	1	47	1	1
Newells Ln	NB	46	46	0	46	0	0	46	0	0
	SB	46	46	0	46	0	0	46	0	0
Broad Rd	NB	46	47	1	47	1	0	46	0	-1
	SB	47	47	0	47	0	0	47	0	0
Inlands Rd	NB	46	46	0	46	0	0	46	0	0
	SB	46	46	0	46	0	0	46	0	0
Stein Rd	NB	57	58	1	58	1	0	59	2	1
	SB	53	54	1	55	2	1	55	2	1
Stockbridge Rd	NB	55	46	-9	46	-9	0	46	-9	0
	SB	55	46	-9	46	-9	0	41	-14	-5
Basin Rd	NB	51	43	-8	39	-12	-4	45	-6	2
	SB	62	107	45	166	104	59	100	38	-7
Whyke Rd	NB	23	27	4	32	9	5	31	8	4
	SB	26	41	15	36	10	-5	26	0	-15

## 1.6 Impact of Arundel bypass

- 1.6.1 The sensitivity test was undertaken in order to respond to comment 1786 in order to understand the impact of the A27 Arundel bypass to the A27, to the A27 Chichester bypass and to the local network that connects Chichester and Arundel.

*“Why has the approved and programmed Arundel bypass scheme not been included in the transport model? This scheme will increase the traffic problems on the Chichester bypass and encourage additional rat-running on local roads”*

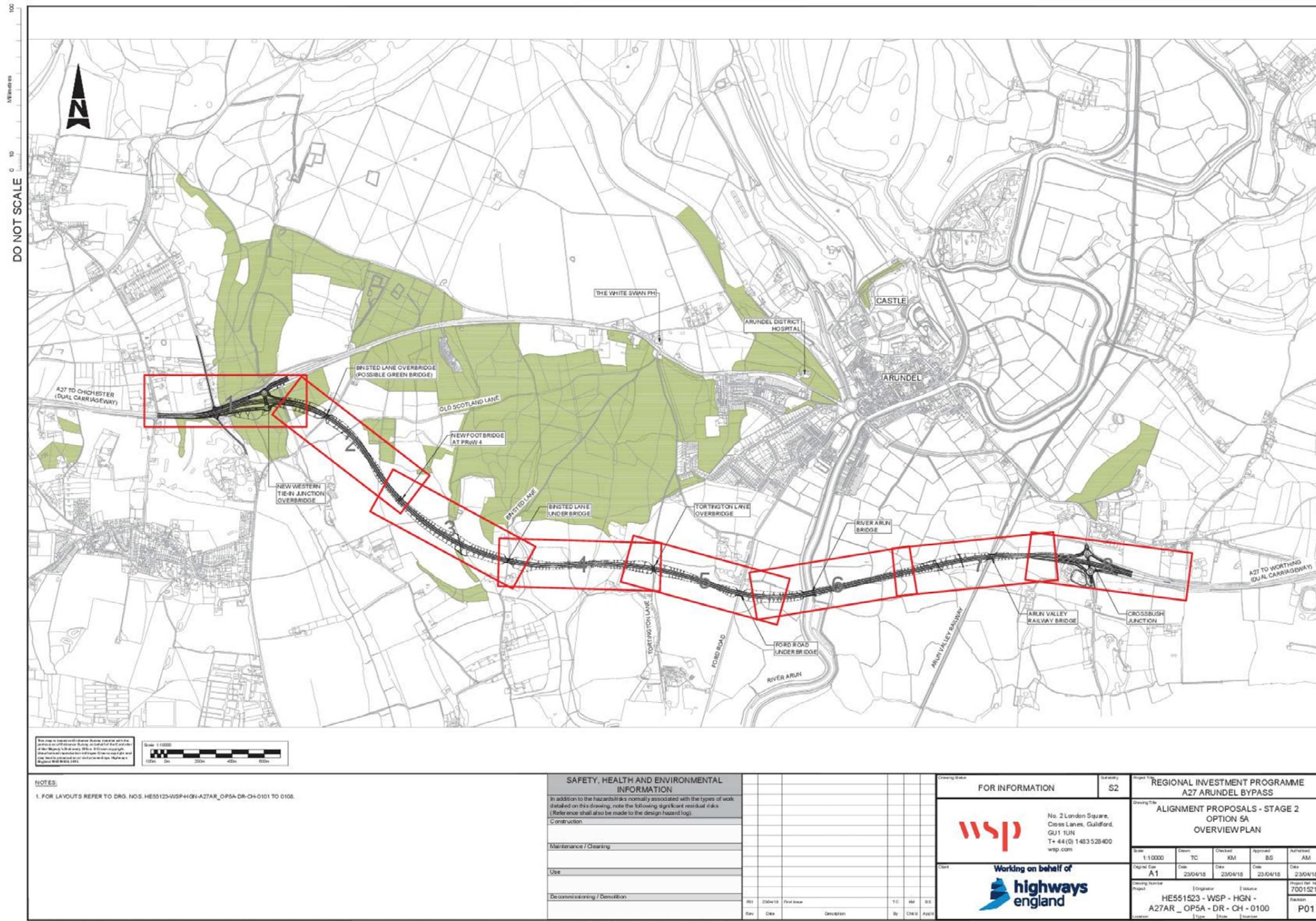
- 1.6.2 A preferred route option for the bypass was announced by Highways England<sup>1</sup> in May 2018. This option is known as Option 5A. A further consultation is to be held later in 2019, with a further announcement on a preferred route expected in 2020. With the aim to submit an application for a Development Consent Order under the Planning Act 2008 in 2021 and start construction in late 2022.”
- 1.6.3 For the purpose of the sensitivity test, the current preferred route option 5A was assessed.
- 1.6.4 Figure 2.3.1 shows the Arundel bypass – Option 5A.
- 1.6.5 It is worth noting that Highways England undertook modelling of the Arundel Bypass. Their modelling included variable demand modelling which takes into account the constraining effects of congestion on traffic flows without the bypass, and conversely the inducement effects on traffic with the bypass in place. The results are reported in the Highways England A27 Arundel Bypass Scheme Assessment Report 2018. The report did not explicitly consider the impacts of the Arundel Bypass on the A27 Chichester Bypass but indicated that flows on the A27 on the eastern and western approaches to the bypass would increase compared to the scenario without the bypass.
- 1.6.6 The PBA forecasting model is a fixed trip highway matrix model and will not account for changes in travel behaviours to reduce the demand on the highway network at peak times in the absence of capacity enhancements or increase demand when capacity is increased. This is because no public transport model or demand model was available at the time of creating it.
- 1.6.7 To deal with this, an allowance for a moderate modalshift of 5% away from use of private motor car at peak times was taken on board along with Income and Fuel price adjustment factors and derivation of trip rates for Local Plan Development.

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<sup>1</sup> <https://highwaysengland.co.uk/projects/a27-arundel-improvement/>

Figure 2.3.1 Arundel bypass option 5A

Page 164



- 1.6.8 The fixed trip modelling undertaken by PBA has considered the flow changes at key locations on the A27 around Arundel and on the A27 Chichester Bypass. The results are shown in Tables 2.3.1 and 2.3.2 for the AM and PM peak hours respectively. The flows are tabulated for the 'Without' and 'With' Arundel Bypass, as well as showing the absolute and percentage differences in these flows.
- 1.6.9 In the AM peak, the impact of the Arundel bypass is shown to be relatively small on most sections of the Chichester Bypass although there are some links which show relatively higher flow increases; with the highest percentage increase on the A27 Chichester Bypass being of the order of 7.8% between Bognor Road roundabout and Oving Road Signals. These sections will be higher because of a transfer of traffic from the A259 route which joins at the Bognor Road roundabout.
- 1.6.10 There does not appear to be any major wider reassignment, once the bypass is modelled and the results indicate that these flow changes do not change the level of service on the impacted junctions.

Table 2.3.1 AM Peak Hour (0800-0900) Flows on main links

AM 2035 Scenario 1 with mitigation						
Area	Junctions	Direction	Without the Arundel bypass	With the Arundel bypass	Diff With - Without	%Diff With - Without
A27 Chichester bypass	West of Fishbourne Roundabout	EB	2541	2537	-4	-0.2%
		WB	2339	2328	-11	-0.5%
	Between Fishbourne Roundabout and Stockbridge Roundabout	EB	1964	1955	-9	-0.5%
		WB	3085	3064	-21	-0.7%
	Between Stockbridge Roundabout and Whyke Roundabout	EB	2167	2158	-9	-0.4%
		WB	3011	2982	-29	-1.0%
	Between Whyke Roundabout and Bognor Roundabout	EB	2380	2395	15	0.6%
		WB	2232	2224	-8	-0.4%
	Between Bognor Roundabout and Oving Road Signals	NB	1848	1993	145	7.8%
		SB	2246	2258	12	0.5%
Between Oving Road Signals and Portfield Roundabout	NB	1877	1951	74	3.9%	
	SB	2244	2256	12	0.5%	
A27 between Chichester and Arundel bypass	Between Portfield Roundabout and A27/A285	EB	1978	2098	120	6.1%
		WB	2704	2795	91	3.4%
	Between A27/A285 and A27/Meadow Way Roundabout	EB	2136	2284	148	6.9%
		WB	3339	3341	2	0.1%
	Between A27/Meadow Way Roundabout and A27 Fontwell West Roundabout	EB	1825	2017	192	10.5%
		WB	2315	2535	220	9.5%
Between A27 Fontwell West Roundabout and A27 Fontwell East Roundabout	EB	1941	1899	-42	-2.2%	
	WB	2220	2256	36	1.6%	
Approaches to Arundel bypass	West approach of Arundel bypass	EB	1385	1468	83	6.0%
		WB	1755	2475	720	41.0%
	East approach of Arundel bypass	EB	1232	1305	73	5.9%
		WB	1405	1835	430	30.6%

- 1.6.11 The PM peak analysis suggests that the impact of the Arundel bypass appears to be local in the Arundel area and is not significantly affecting the A27 Chichester bypass or causing a wider rat running issues. All changes in traffic flow as a result of the inclusion of the Arundel bypass, on the Chichester bypass, are well below 5%.

Table 2.3.2 PM Peak Hour (1700-1800) Flows on main links

PM 2035 Scenario 1 with mitigation						
Area	Level Crossing	Direction	Without the Arundel bypass	With the Arundel bypass	Diff With - Without	%Diff With - Without
A27 Chichester bypass	West of Fishbourne Roundabout	EB	2267	2274	7	0.3%
		WB	2584	2577	-7	-0.3%
	Between Fishbourne Roundabout and Stockbridge Roundabout	EB	2159	2172	13	0.6%
		WB	2301	2311	10	0.4%
	Between Stockbridge Roundabout and Whyke Roundabout	EB	2608	2618	10	0.4%
		WB	2574	2567	-7	-0.3%
	Between Whyke Roundabout and Bognor Roundabout	EB	2456	2471	15	0.6%
		WB	2288	2277	-11	-0.5%
	Between Bognor Roundabout and Oving Road Signals	NB	1857	1912	55	3.0%
		SB	2461	2473	12	0.5%
Between Oving Road Signals and Portfield Roundabout	NB	2433	2491	58	2.4%	
	SB	2459	2471	12	0.5%	
A27 between Chichester and Arundel bypass	Between Portfield Roundabout and A27/A285	EB	2265	2325	60	2.6%
		WB	2337	2402	65	2.8%
	Between A27/A285 and A27/Meadow Way Roundabout	EB	2890	2981	91	3.1%
		WB	2548	2649	101	4.0%
	Between A27/Meadow Way Roundabout and A27 Fontwell West Roundabout	EB	2415	2550	135	5.6%
		WB	1912	2037	125	6.5%
Between A27 Fontwell West Roundabout and A27 Fontwell East Roundabout	EB	2122	2341	219	10.3%	
	WB	2086	2193	107	5.1%	
Approaches to Arundel bypass	West approach of Arundel bypass	EB	1581	1853	272	17.2%
		WB	1552	2009	457	29.4%
	East approach of Arundel bypass	EB	1381	1522	141	10.2%
		WB	1239	1601	362	29.2%

1.6.12 Appendix A2 includes plots of flows for the 2035 Scenario 1 with mitigation, with the Arundel bypass and without the Arundel bypass.

1.6.13 In summary, the modelling suggests that the impacts of the A27 Arundel Bypass will have the greatest impact in the area local to Arundel and flow increases on the Chichester Bypass will be relatively modest at less than 5% in most cases in both the AM and PM peaks.

## 1.7 Impact of Peak Spreading

1.7.1 The sensitivity test was undertaken in order to respond to comment 1786 –

1.7.2 “Model has a fixed Trip matrix. This means that there will be further peak traffic spreading into off-peak periods from unfinished trips in peak hours not modelled. This will result in longer periods of congestion and corresponding costs and environmental issues. What is the impact of this?”

1.7.3 The term 'peak spreading' refers to the process of reducing the proportion of traffic demand in the most severely congested, or critical part of the peak hour with corresponding increases in demand at time periods immediately before and after the critical peak. Peak spreading generally occurs for two reasons:

- i. Journeys take longer due to congestion; therefore, these journeys would overlap time periods (known as passive peak spreading); and
- ii. Travellers will travel depart earlier or later to avoid the worst of the peak within their journeys (known as active peak spreading).

- 1.7.4 Within the modelling context it is possible to look at flows in two ways. Firstly the 'Actual Flow', which is the flow on a link within the modelled period, that would actually be present and 'Demand Flow', which includes traffic assigned to the same route which does not reach the junction in the modelled hour due to congestion upstream.
- 1.7.5 To understand the potential level of peak spreading and to provide an indication on how future development may impact upon the length of the peak, a comparison of the actual flow (PCU's) against the demand flow (PCU's) for the base year, 2035 Reference Case and 2035 Scenario 1 with mitigation models for each of the modelled periods was undertaken.
- 1.7.6 Tables 2.4.1, 2.4.2 and 2.4.3 highlight the A27 Chichester bypass demand and actual flow, along with the difference for the AM peak, inter peak and PM peak respectively, with plots provided within Appendix A3.
- 1.7.7 By looking at changes in the difference between the actual and demand flows, it is possible to get an understanding of the likely impact of passive peak spreading at the end of the plan period, when comparing the data between the base year and the mitigated local plan scenario. The difference represents the unreleased demand in the peak period.
- 1.7.8 Data is also provided to show how the mitigated Local Plan model performs against the Reference Case, which reflects the traffic conditions including committed development and background growth assumptions and comparing the mitigated Local Plan with the unmitigated Local Plan Scenario.
- 1.7.9 The results do show that the differences between the base and all future year scenarios increases, which indicates that there is more traffic trying to get onto the network in the peak hour but cannot. Therefore, this traffic will be seen on the network in the next period.
- 1.7.10 The Local Plan flows without mitigation show some relatively high levels of unreleased demand on most links in the AM and PM peak hours and these are substantially higher than the base year figures. This does indicate that passive peak spreading could be relatively substantial, if drivers do not change the time of travel due to congestion.
- 1.7.11 When the mitigation is included within the Local Plan tests, the level of unreleased demand is substantially reduced and, in most cases, falls below that of the Reference Case. Whilst there is still an increase over the base year, the unreleased demand in the AM and PM peaks is less than 10% of the peak hour flow in most cases.

Table 2.4.1 A27 Chichester bypass AM peak hour (0800-0900) Difference Between Actual and Demand flows

AM							
Junctions	Direction	2014 Base Actual Flow	2014 Base Demand Flow	Diff Actual - Demand	2035 Reference Case Actual Flow	2035 Reference Case Demand Flow	Diff Actual - Demand
West of Fishbourne Roundabout	EB	2073	2149	-76	2241	2510	-269
	WB	2090	2194	-104	2305	2444	-139
Between Fishbourne Roundabout and Stockbridge Roundabout	EB	1622	1685	-63	1736	1930	-194
	WB	2280	2384	-104	2877	3053	-176
Between Stockbridge Roundabout and Whyke Roundabout	EB	1552	1609	-57	1964	2159	-195
	WB	2191	2281	-90	2784	3018	-234
Between Whyke Roundabout and Bognor Roundabout	EB	1539	1584	-45	1966	2159	-193
	WB	1791	1895	-104	1830	1985	-155
Between Bognor Roundabout and Oving Road Signals	NB	1170	1225	-55	1401	1539	-138
	SB	1522	1537	-15	2331	2497	-166
Between Oving Road Signals and Portfield Roundabout	NB	1294	1346	-52	1607	1740	-133
	SB	1599	1606	-7	2331	2497	-166
East of Portfield Roundabout	EB	1457	1500	-43	1720	1835	-115
	WB	2312	2323	-11	2203	2307	-104

AM							
Junctions	Direction	2035 Scenario 1 Actual Flow	2035 Scenario 1 Demand Flow	Diff Actual - Demand	2035 Scenario 1 Mitigated Actual Flow	2035 Scenario 1 Mitigated Demand Flow	Diff Actual - Demand
West of Fishbourne Roundabout	EB	2544	2950	-406	2541	2797	-256
	WB	2104	2496	-392	2339	2539	-200
Between Fishbourne Roundabout and Stockbridge Roundabout	EB	1972	2280	-308	1964	2140	-176
	WB	2443	2917	-474	3085	3373	-288
Between Stockbridge Roundabout and Whyke Roundabout	EB	2042	2323	-281	2167	2345	-178
	WB	2748	3361	-613	3011	3189	-178
Between Whyke Roundabout and Bognor Roundabout	EB	1972	2270	-298	2380	2541	-161
	WB	2140	2630	-490	2232	2416	-184
Between Bognor Roundabout and Oving Road Signals	NB	1427	1634	-207	1848	1968	-120
	SB	2410	2788	-378	2246	2327	-81
Between Oving Road Signals and Portfield Roundabout	NB	1667	1875	-208	1877	1991	-114
	SB	2410	2788	-378	2244	2325	-81
East of Portfield Roundabout	EB	1732	1923	-191	1978	2073	-95
	WB	2204	2515	-311	2704	2828	-124

Table 2.4.2 A27 Chichester bypass IP hour (1000-1600) Difference Between Actual and Demand flows

IP							
Junctions	Direction	2014 Base Actual Flow	2014 Base Demand Flow	Diff Actual - Demand	2035 Reference Case Actual Flow	2035 Reference Case Demand Flow	Diff Actual - Demand
West of Fishbourne Roundabout	EB	1763	1763	0	2012	2026	-14
	WB	1767	1782	-15	1873	1923	-50
Between Fishbourne Roundabout and Stockbridge Roundabout	EB	1702	1703	-1	1642	1656	-14
	WB	1732	1754	-22	2175	2224	-49
Between Stockbridge Roundabout and Whyke Roundabout	EB	1653	1653	0	2116	2137	-21
	WB	1726	1752	-26	2313	2385	-72
Between Whyke Roundabout and Bognor Roundabout	EB	1535	1536	-1	2051	2081	-30
	WB	1714	1746	-32	1740	1804	-64
Between Bognor Roundabout and Oving Road Signals	NB	1303	1326	-23	1463	1509	-46
	SB	1453	1482	-29	2291	2354	-63
Between Oving Road Signals and Portfield Roundabout	NB	1342	1326	16	1506	1548	-42
	SB	1503	1511	-8	2291	2354	-63
East of Portfield Roundabout	EB	1513	1529	-16	1707	1739	-32
	WB	1697	1708	-11	1910	1924	-14

IP							
Junctions	Direction	2035 Scenario 1 Actual Flow	2035 Scenario 1 Demand Flow	Diff Actual - Demand	2035 Scenario 1 Mitigated Actual Flow	2035 Scenario 1 Mitigated Demand Flow	Diff Actual - Demand
West of Fishbourne Roundabout	EB	2112	2128	-16	2087	2105	-18
	WB	1855	1964	-109	2018	2032	-14
Between Fishbourne Roundabout and Stockbridge Roundabout	EB	1665	1681	-16	1569	1584	-15
	WB	2434	2573	-139	2193	2209	-16
Between Stockbridge Roundabout and Whyke Roundabout	EB	2095	2196	-101	2000	2025	-25
	WB	2316	2431	-115	2344	2364	-20
Between Whyke Roundabout and Bognor Roundabout	EB	2011	2121	-110	2347	2370	-23
	WB	1735	1836	-101	2167	2183	-16
Between Bognor Roundabout and Oving Road Signals	NB	1438	1535	-97	1915	1932	-17
	SB	2266	2367	-101	2206	2221	-15
Between Oving Road Signals and Portfield Roundabout	NB	1499	1584	-85	1911	1927	-16
	SB	2266	2367	-101	2204	2219	-15
East of Portfield Roundabout	EB	1697	1765	-68	1943	1956	-13
	WB	1923	1944	-21	2187	2201	-14

Table 2.4.3 A27 Chichester bypass PM hour (1700-1800) Difference Between Actual and Demand flows

Junctions	Direction	PM					
		2014 Base Actual Flow	2014 Base Demand Flow	Diff Actual - Demand	2035 Reference Case Actual Flow	2035 Reference Case Demand Flow	Diff Actual - Demand
West of Fishbourne Roundabout	EB	2153	2214	-61	2176	2471	-295
	WB	2211	2301	-90	2184	2344	-160
Between Fishbourne Roundabout and Stockbridge Roundabout	EB	1822	1985	-163	2002	2238	-236
	WB	1848	1896	-48	2603	2775	-172
Between Stockbridge Roundabout and Whyke Roundabout	EB	1883	1966	-83	2465	2678	-213
	WB	1662	1711	-49	2323	2546	-223
Between Whyke Roundabout and Bognor Roundabout	EB	1621	1683	-62	2581	2863	-282
	WB	1603	1661	-58	1660	1848	-188
Between Bognor Roundabout and Oving Road Signals	NB	1209	1251	-42	1216	1343	-127
	SB	1365	1428	-63	1662	1879	-217
Between Oving Road Signals and Portfield Roundabout	NB	1224	1280	-56	1479	1613	-134
	SB	1318	1326	-8	1842	1879	-37
East of Portfield Roundabout	EB	1973	2031	-58	2098	2236	-138
	WB	1503	1512	-9	1867	1897	-30

Junctions	Direction	PM					
		2035 Scenario 1 Actual Flow	2035 Scenario 1 Demand Flow	Diff Actual - Demand	2035 Scenario 1 Mitigated Actual Flow	2035 Scenario 1 Mitigated Demand Flow	Diff Actual - Demand
West of Fishbourne Roundabout	EB	2215	2579	-364	2267	2470	-203
	WB	2014	2541	-527	2584	2831	-247
Between Fishbourne Roundabout and Stockbridge Roundabout	EB	2073	2410	-337	2159	2348	-189
	WB	2750	3459	-709	2301	2433	-132
Between Stockbridge Roundabout and Whyke Roundabout	EB	2586	3247	-661	2608	2849	-241
	WB	2329	2685	-356	2574	2660	-86
Between Whyke Roundabout and Bognor Roundabout	EB	2346	2886	-540	2456	2678	-222
	WB	1597	1875	-278	2288	2371	-83
Between Bognor Roundabout and Oving Road Signals	NB	810	979	-169	1857	2046	-189
	SB	1634	1693	-59	2461	2551	-90
Between Oving Road Signals and Portfield Roundabout	NB	1357	1577	-220	2433	2644	-211
	SB	1634	1693	-59	2459	2549	-90
East of Portfield Roundabout	EB	2219	2467	-248	2265	2461	-196

- 1.7.12 In the Inter peak, the mitigated model almost meets the demand while the unmitigated one is underperforming.
- 1.7.13 Another useful output from the model is over-capacity queues. This provides the total time spent queueing by all traffic within the model area, as a result of junctions being over capacity. It is possible to extract this data from the model not only for the assessed peak hour, but also for the following hour. This therefore is useful to understand the impact of the Local Plan development on the network, in terms of queues and assist in understanding on how this may impact on e.g. air quality.
- 1.7.14 Tables 2.4.4 compares the Over Capacity Queues (PCU HRS/HR) (for the Base year, and end of plan period for the Reference Case, non-mitigated and mitigated scenarios for the modelled period, whilst Table 2.4.5 provides data for the following period.

Table 2.4.4 Over Capacity Queues for assessed peak hour (PCU HRS/HR)

Scenario	AM	IP	PM
Base 2014	1,031.2	75.8	802.8
2035 Reference Case	2,307.3	348.2	2,070.6
2035 Scenario 1 without mitigation	3,373.4	526.2	3,000.7
2035 Scenario 1 with mitigation	2,183.0	241.2	1,891.1

Table 2.4.5 Over Capacity Queues next time peak hour (PCU HRS/HR)

Scenario	AM	IP	PM
Base 2014	187.5	3.5	139.2
2035 Reference Case	728.9	23.0	475.5
2035 Scenario 1 without mitigation	1024.3	50.1	1769.5
2035 Scenario 1 with mitigation	513.8	14.4	740.6

- 1.7.15 The results in the tables indicate that as expected there is an increase between the base scenario and the 2035 Reference Case in all time periods in both the modelled peak hour and next period. This increases further when the Local Plan development is added to the model. However, when the mitigation schemes are added the overcapacity queues drop dramatically in both the modelled period and the following period. The figures drop below that of the Reference Case in nearly all instances, apart from the PM peak period following the modelled peak hour.
- 1.7.16 These outputs demonstrate that the Local Plan development can be delivered without increasing overall delays in the modelled area and therefore, with the mitigation in place the reduction in over capacity queues will have a positive impact on associated consequences, such as air quality.

## 1.8 Impact of Allowing right turns at A27 junctions and on local traffic

- 1.8.1 The sensitivity test was undertaken in order to respond to comment 3581 –

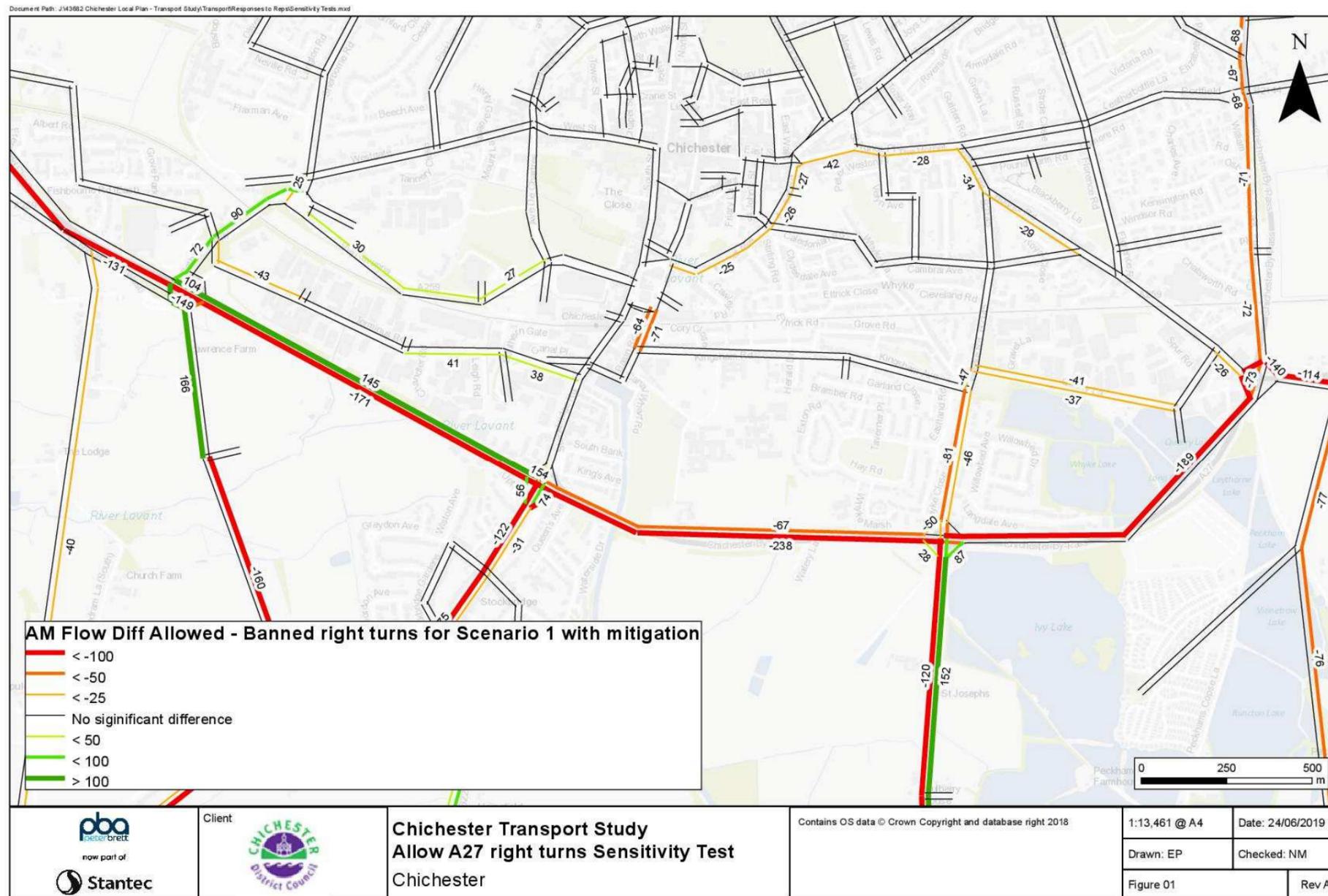
*“Redo analysis of traffic flows with right hand turns off A27 in place, taking account of local traffic needs and analyse more accurately the conflict arising from PBA’s non-separation of through and local traffic and whether their proposals will accommodate the additional traffic” –*

The comment relates to the need to understand the impact of allowing the right turns at the A27 Stockbridge and Whyke junctions. The mitigation proposals at these junctions prohibits these right turns. The principle behind proposing the right turn bans was partly to dissuade east to west cross city traffic and vice versa, from rat-running or using roads through the city instead of completing their trips using the A27. For example, the modelling showed that some traffic using the A27 from the east of Chichester, to head to western destinations such as Chichester College, would use the right turns to leave the A27 Chichester Bypass and then use unsuitable routes through the city instead of staying on the A27 and exiting at Fishbourne Roundabout. Banning these right turns would be expected to reduce this rat running and keep A27 traffic on the Chichester Bypass instead of using rat runs that could potentially exacerbate air quality issues in Chichester City. The right turn bans also mean a smaller footprint of the junctions which makes it possible to comfortably retain the footbridges in the vicinity of the junctions.

- 1.8.2 To produce revisions to the mitigation schemes to allow for the right turns, we have reviewed the current schemes which support the adopted Local Plan, as well as the more strategic HE schemes which looked up to 2043.
- 1.8.3 The PBA study identifies a package of schemes which would address the emerging Local Plan development proposals for the 2035/36 period. We concede that the proposed design of certain junctions such as Stockbridge and Whyke follow the principle of the HE proposals noting the inclusion of part of the Stockbridge Link (not all as per HE Proposals), however these are considered appropriate to address the additional development proposed.
- 1.8.4 In order to understand the impact of allowing the right turns, we compared actual flows (PCU's) (flow on a link within the modelled period, that would actually be present) and delays (seconds) of the unmitigated network, the mitigated network and the mitigated work with the right turns allowed (northbound and southbound right turns) for the AM and PM peak hours.
- 1.8.5 Plots showing flows from the 2035 Scenario with mitigation and the 2035 Scenario with mitigation and allowed A27 turns, are included in Appendix A4.
- 1.8.6 Figures 2.5.1, 2.5.2 and 2.5.3 illustrate the flow difference and Figures 2.5.4, 2.5.5 and 2.5.6 the delay difference, between the sensitivity test model which allows the right turns at the Stockbridge and Whyke junction against the 2035 Scenario 1 with mitigation model proposed.
- 1.8.7 Flows going through Fishbourne Roundabout are reduced in our sensitivity test compared to the 2035 Scenario 1 with mitigation. Users prefer not to use the roundabout, probably because the A27 Chichester bypass is not so attractive due to increased delays.
- 1.8.8 Flows going through Stockbridge junction are reduced in our sensitivity test compared to the 2035 Scenario 1 with mitigation even if the right turns are allowed, providing more route choices. Users prefer not to use the junction, probably because the A27 Chichester bypass and the junction is not so attractive due to increased delays.
- 1.8.9 Flows going through Whyke junction are reduced in our sensitivity test compared to the 2035 Scenario 1 with mitigation even if the right turns are allowed, providing more route choices. Users prefer not to use the junction, probably because the A27 Chichester bypass and the junction is not so attractive due to increased delays.
- 1.8.10 Flows going through Bognor Road roundabout are reduced in our sensitivity test compared to the 2035 Scenario 1 with mitigation. Users prefer not to use the roundabout, probably because the A27 Chichester bypass is not so attractive due to increased delays.
- 1.8.11 Flows going through Oving junction are reduced in our sensitivity test compared to the 2035 Scenario 1 with mitigation. Users prefer not to use the roundabout, probably because the A27 Chichester bypass is not so attractive due to increased delays.

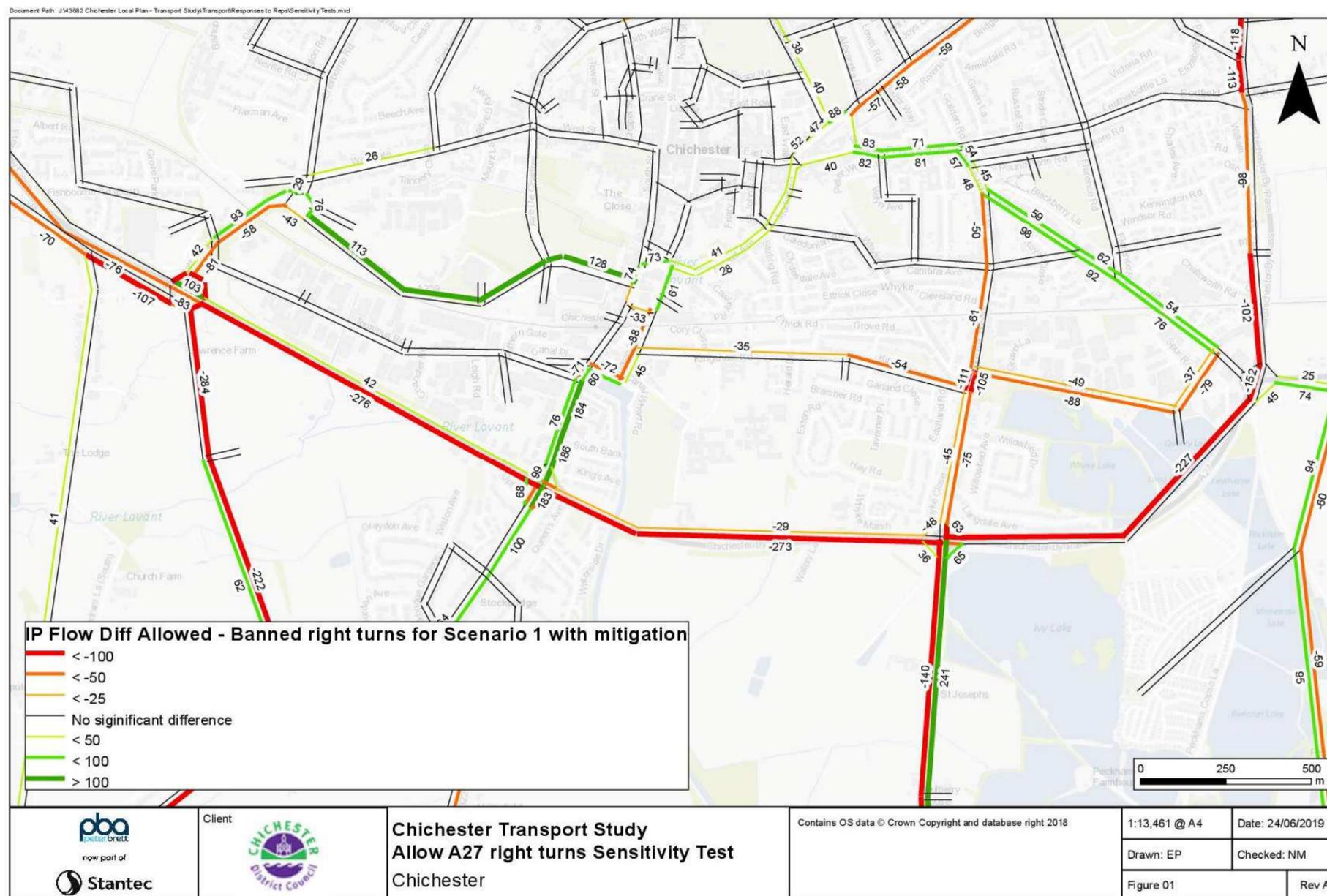
- 1.8.12 Flows going through Portfield roundabout are reduced in our sensitivity test compared to the 2035 Scenario 1 with mitigation. Users prefer not to use the roundabout, probably because the A27 Chichester bypass is not so attractive due to increased delays.

Figure 2.5.1 AM peak hour (0800-0900) Flow Difference Allowed – Banned right turns



- The A27 flow is higher on the banned right turns 2035 Scenario 1 with mitigation. Only the eastbound flow between Fishbourne Roundabout and Stockbridge junction has an increase.
- A259 Cathedral Way northbound is higher with the allowed right turns model.
- South of the A27, the northbound flow of Stockbridge Road and the B2145 is significantly higher at the banned turns model. Moreover, the southbound B2145 is higher on the allowed right turns model.
- Stockbridge Link Road has higher flow at the allowed right turn model northbound from the modelled access of the employment zone and lower southbound.

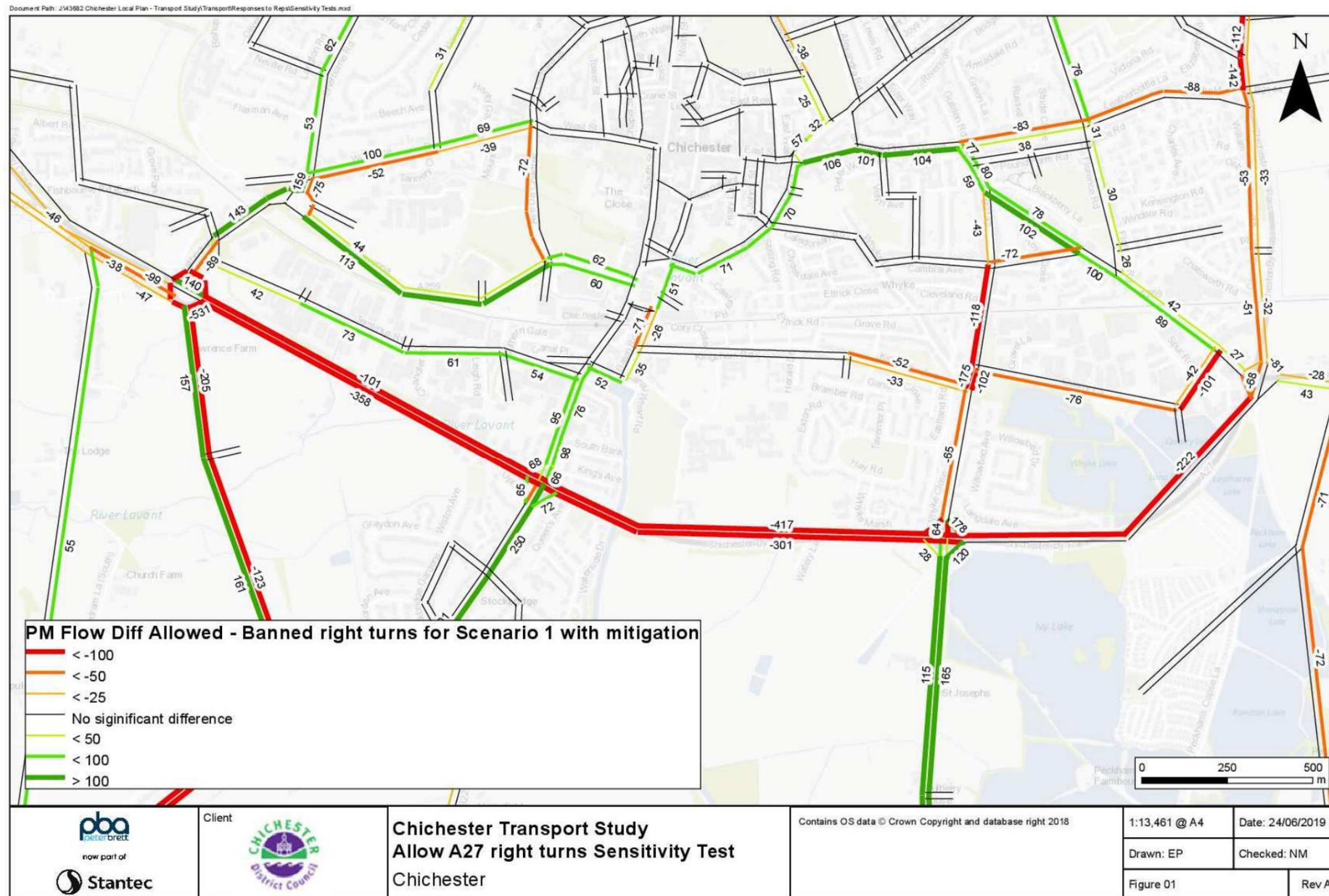
Figure 2.5.2 IP peak hour (1000-1600) Flow Difference Allowed – Banned right turns



Page 175

- The A27 flow is higher on the banned right turns 2035 Scenario 1 with mitigation. Only the eastbound flow between Fishbourne Rbt till Whyke junction has a slight increase.
- A259 Cathedral Way northbound is higher on the allowed right turns model, while the southbound is lower.
- South of the A27, the northbound flow of the B2145 is significantly higher at the banned turns model, however the southbound B2145 is higher on the allowed right turns model.
- Stockbridge Link Road has lower flow at the allowed right turn model southbound and higher northbound till the modelled access of the employment zone.
- The local roads in Chichester city centre, appear to have higher flows on the allowed right turns model, which is an indication of rat-running. However, there are some reductions on Quarry Lane in both directions, and Kingsham Road/Avenue (eastbound only), also St Pancras (westbound) and Whyke Road.

Figure 2.5.3 PM peak hour (1700-1800) Flow Difference Allowed – Banned right turns

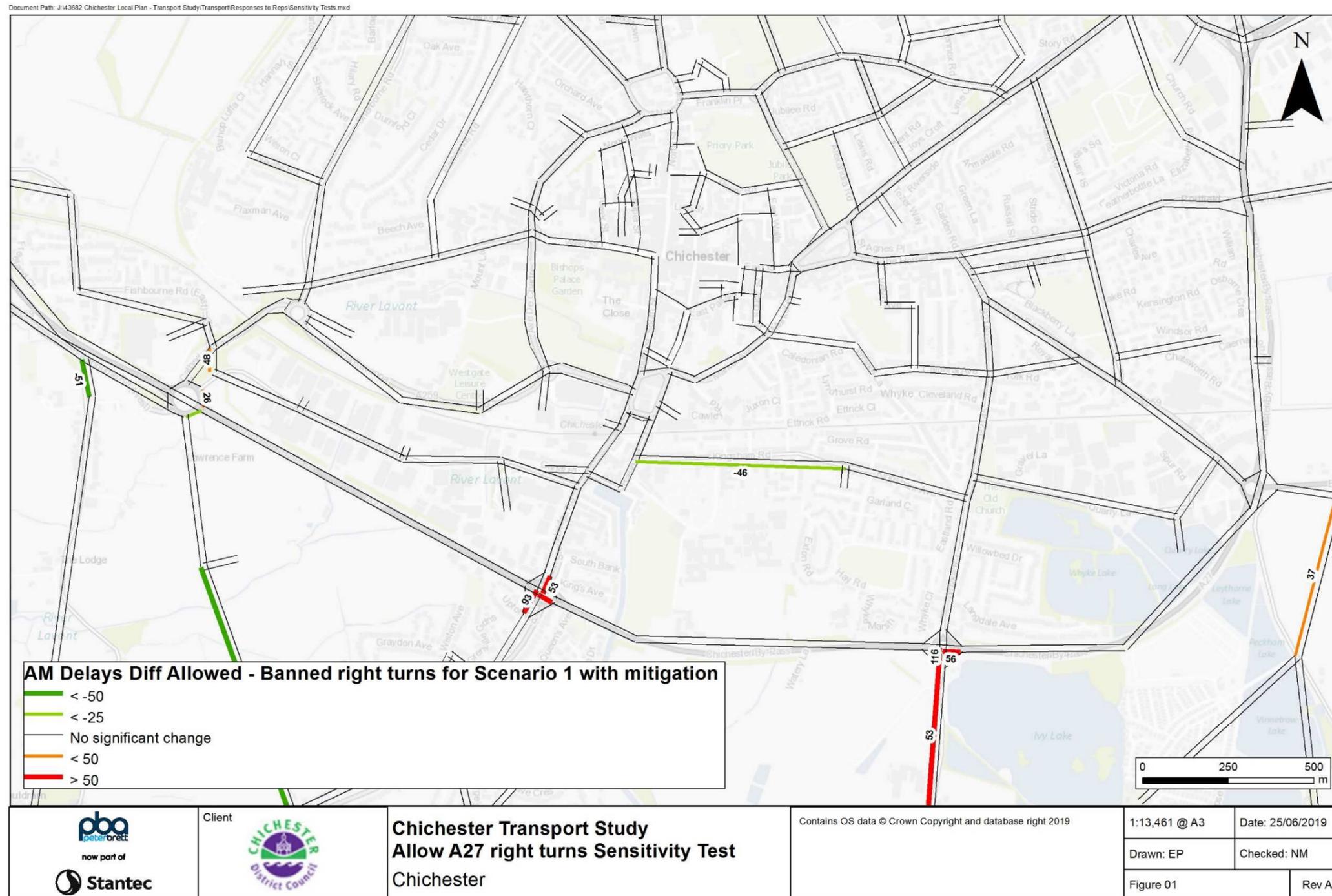


Page 176

- The A27 flow is higher on the banned right turns 2035 Scenario 1 with mitigation
- A259 Cathedral Way northbound is higher on the allowed right turns model.
- South of the A27, the southbound flow of Stockbridge Rd and both movements on the B2145 are significantly higher than the banned turns model.
- Stockbridge Link Road has lower flow on the allowed right turn model southbound and higher northbound.

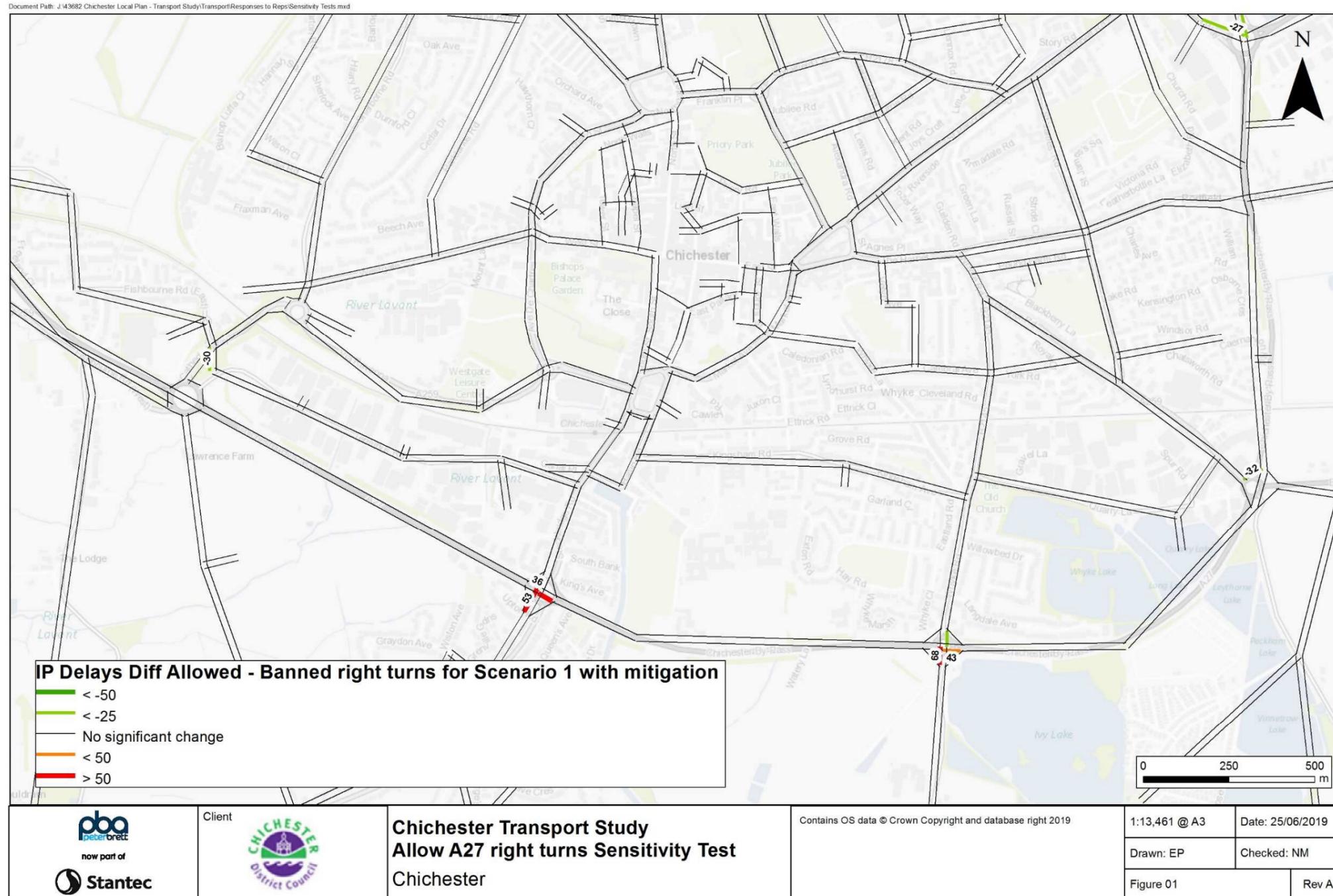
The local roads in Chichester city centre, appear to have higher flows on the allowed right turns model, which is an indication of rat-running, With some reductions at Oving Road, Quarry Lane, Whyke Road, York Rd and Kingsham Avenue (but not Kingsham Rd), Avenue de Chartres (northbound).

Figure 2.5.4 AM peak hour (0800-0900) Flow Difference Allowed – Banned right turns



- Delays are higher at the allowed turns model at both Stockbridge (max delay diff 93 seconds) and Whyke junction (max delay diff 56 seconds). The westbound delay difference on Stockbridge is 61 seconds.

Figure 2.5.5 IP peak hour (1000-1600) Flow Difference Allowed – Banned right turns



- Delays are higher at the allowed turns model at both Stockbridge (max delay diff 74 seconds westbound) and Whyke junction (max delay diff 68 seconds northbound). The eastbound delay difference on Stockbridge is 36 seconds and the westbound delay difference on Whyke is 43 seconds.



- 1.8.13 Allowing the right turns on the A27 Stockbridge and Whyke junctions (northbound and southbound), has an impact on their level of service and subsequently the desirability of the road user to use them and the A27, leading to wider and city centre reassignment on to potentially undesirable rat running routes.

## 1.9 Summary

### Impact due to level crossings closures

- 1.9.1 In summary, the results suggest that most of the level crossings on the A259 Main Road are predicted to maintain similar levels of delays generally seen in the base year, with the mitigation in place. However, the three level crossings in Chichester City are generally predicted to show delays greater than those in the base and in the Reference Case. The delays are generally shown to be relatively small and do not have any impact on route choice within the model.

### Impact of Arundel bypass

- 1.9.2 In summary, the modelling suggests that the impacts of the A27 Arundel Bypass will have the greatest impact in the area local to Arundel and flow increases on the Chichester Bypass will be relatively modest at less than 5% in most cases in both the AM and PM peaks.

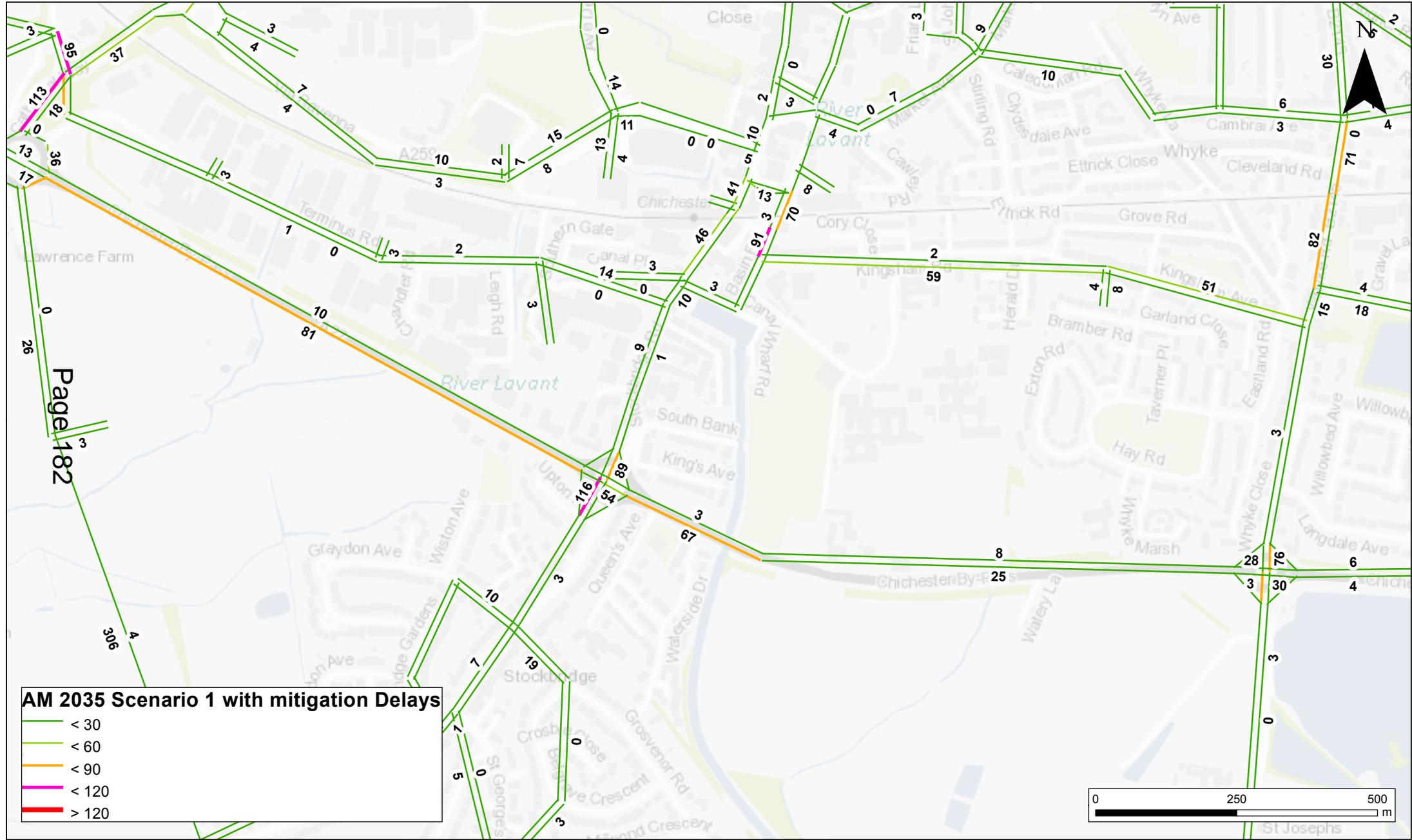
### Impact of Peak Spreading

- 1.9.3 The results demonstrate that the Local Plan development can be delivered without increasing overall delays in the modelled area and therefore, with the mitigation in place the reduction in over capacity queues will have a positive impact on associated consequences, such as air quality.

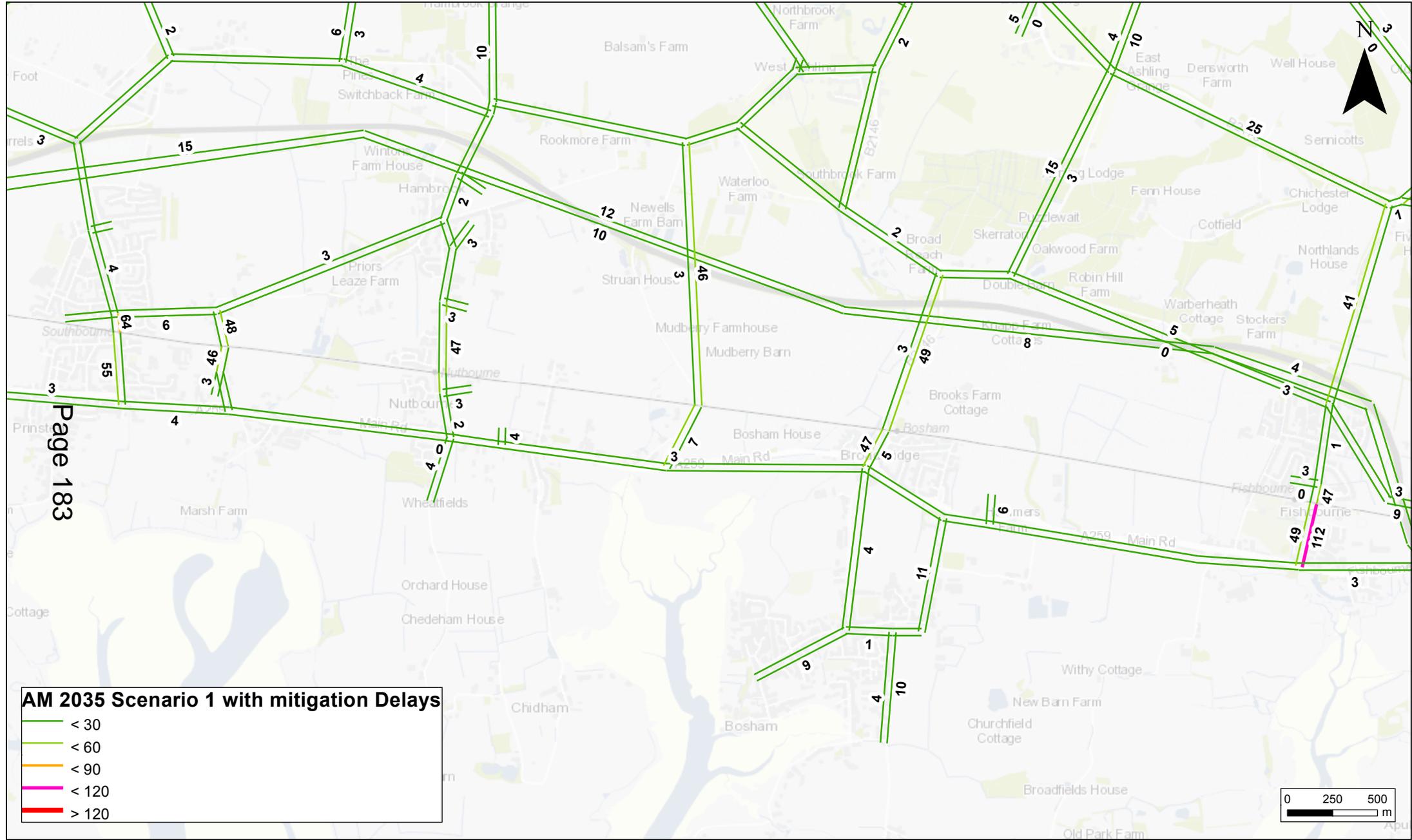
### Impact of Allowing right turns at A27 junctions and on local traffic

- 1.9.4 The results indicate, that allowing the right turns at the A27, results in reduced performance of the junctions and the creation of rat run routes through Chichester City centre.

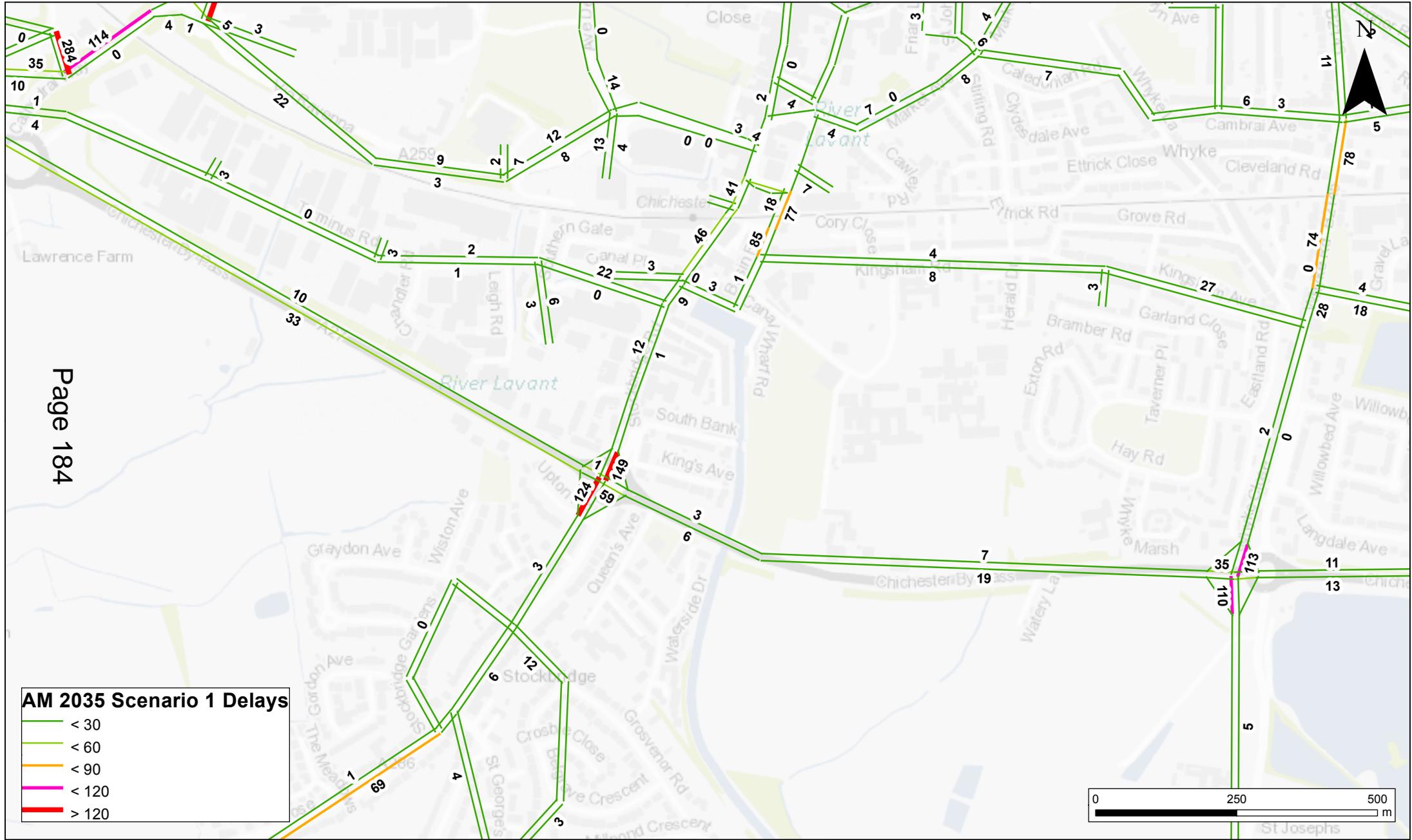
## Appendix A1 Impact to Level Crossings



Page 182



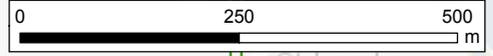
Page 183



Page 184

**AM 2035 Scenario 1 Delays**

- < 30
- < 60
- < 90
- < 120
- > 120

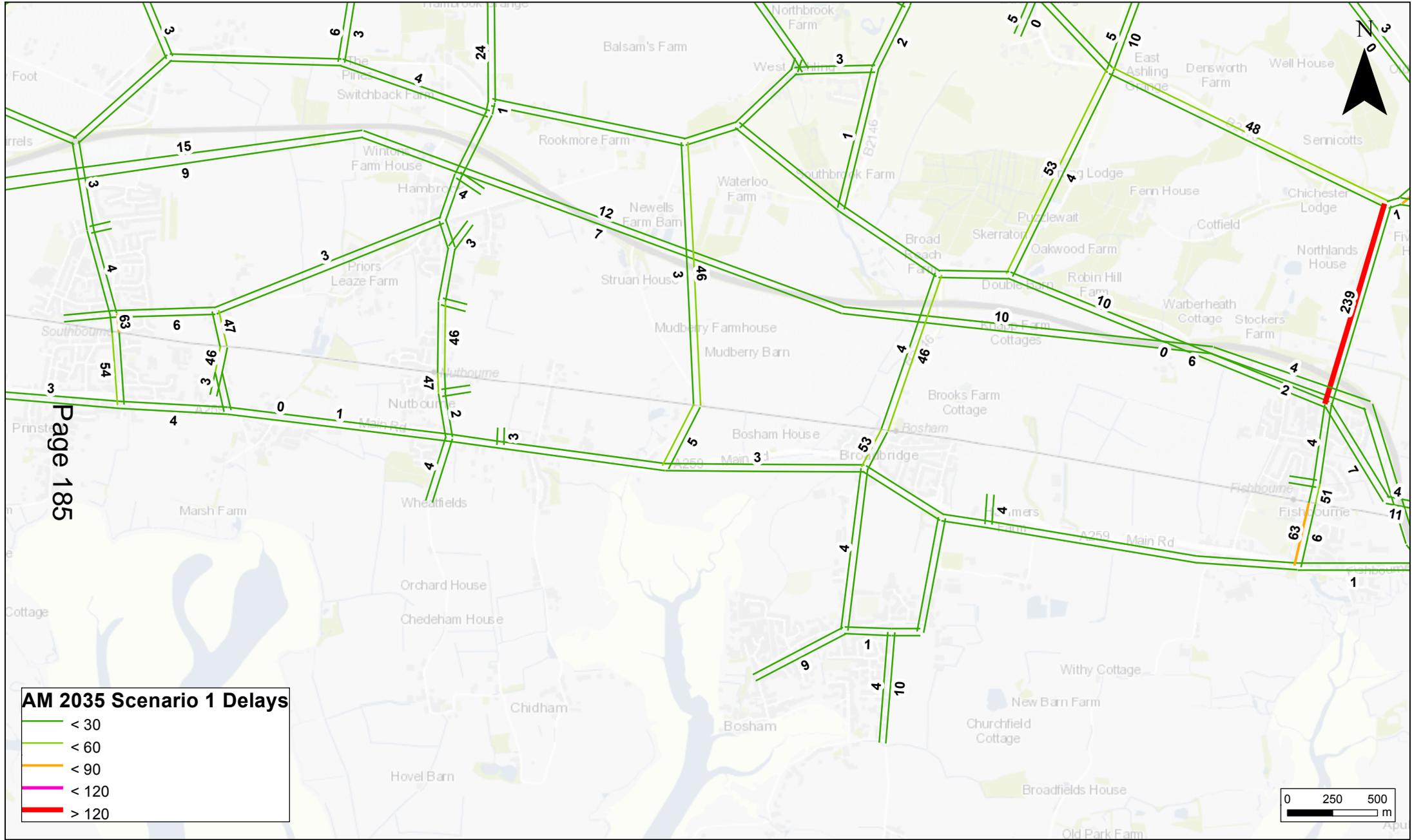


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Level Crossing Sensitivity Test**  
Chichester

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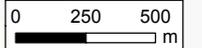
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Figure 01	Rev A



Page 185

**AM 2035 Scenario 1 Delays**

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- < 90
- < 120
- > 120




  
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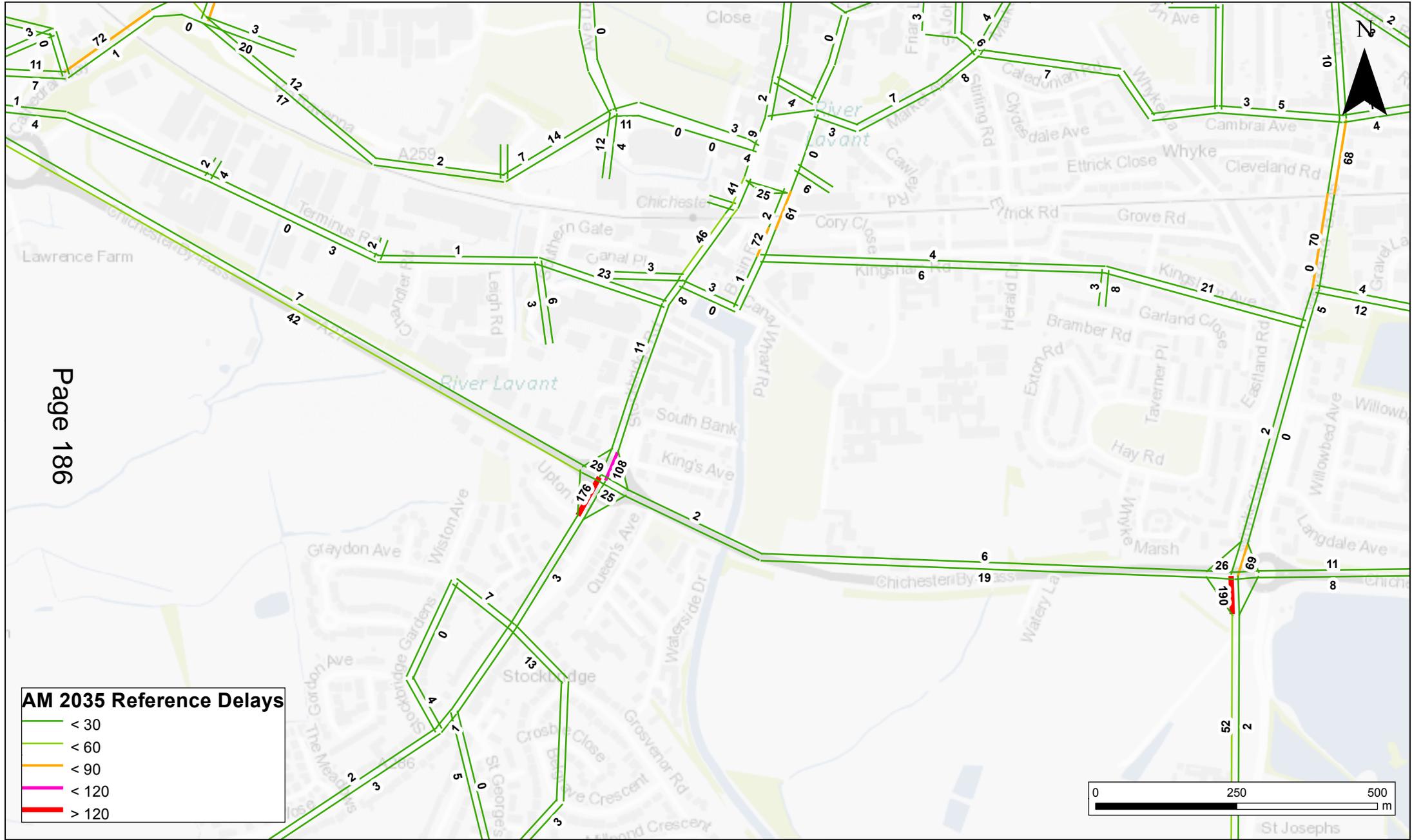

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 A259 Main Road

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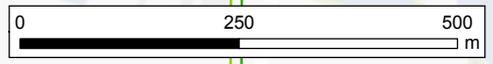
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Figure 01	Rev A



Page 186

**AM 2035 Reference Delays**

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- < 90
- < 120
- > 120

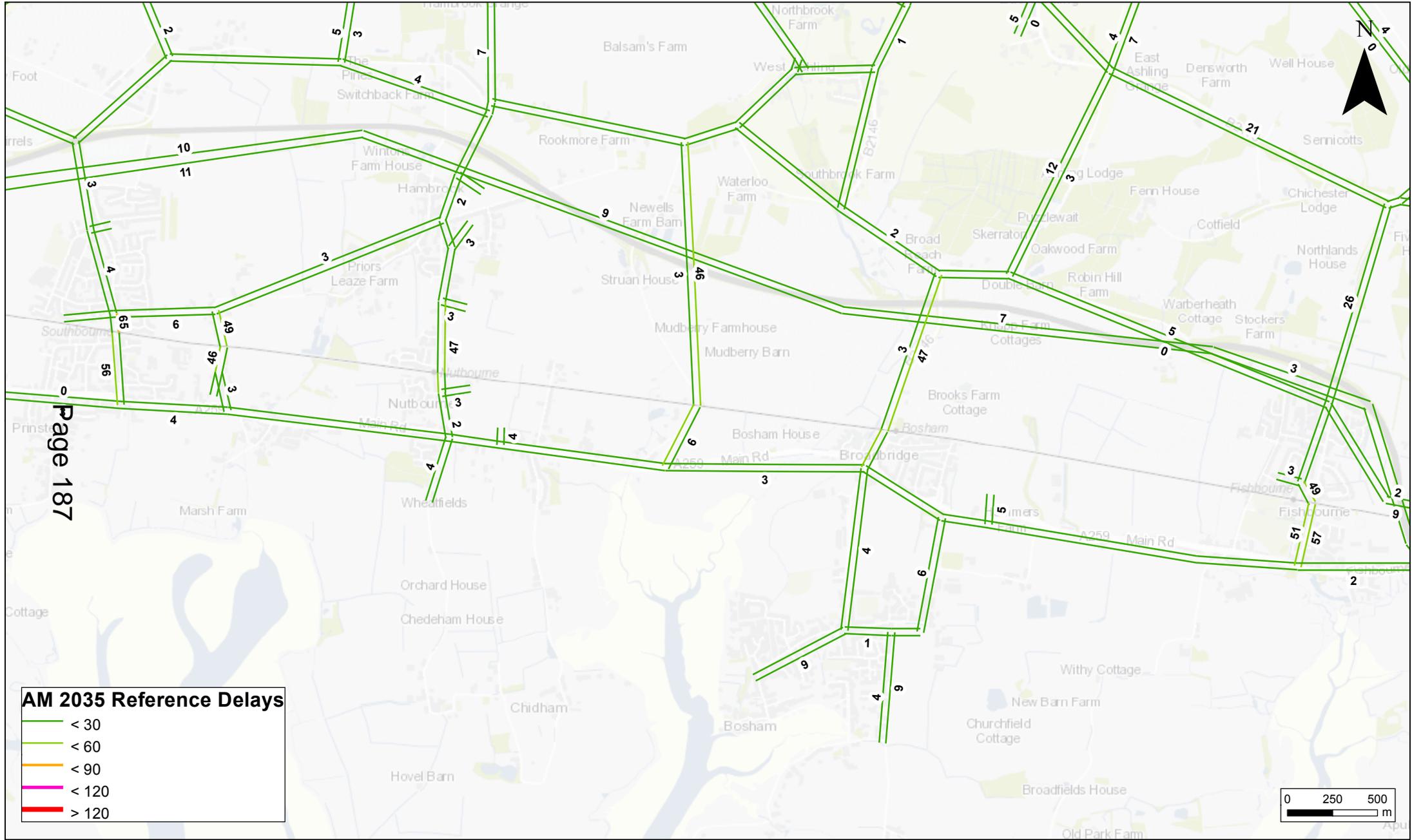


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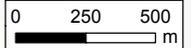
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Figure 01	Rev A



Page 187

**AM 2035 Reference Delays**

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- < 60
- < 90
- < 120
- > 120



  
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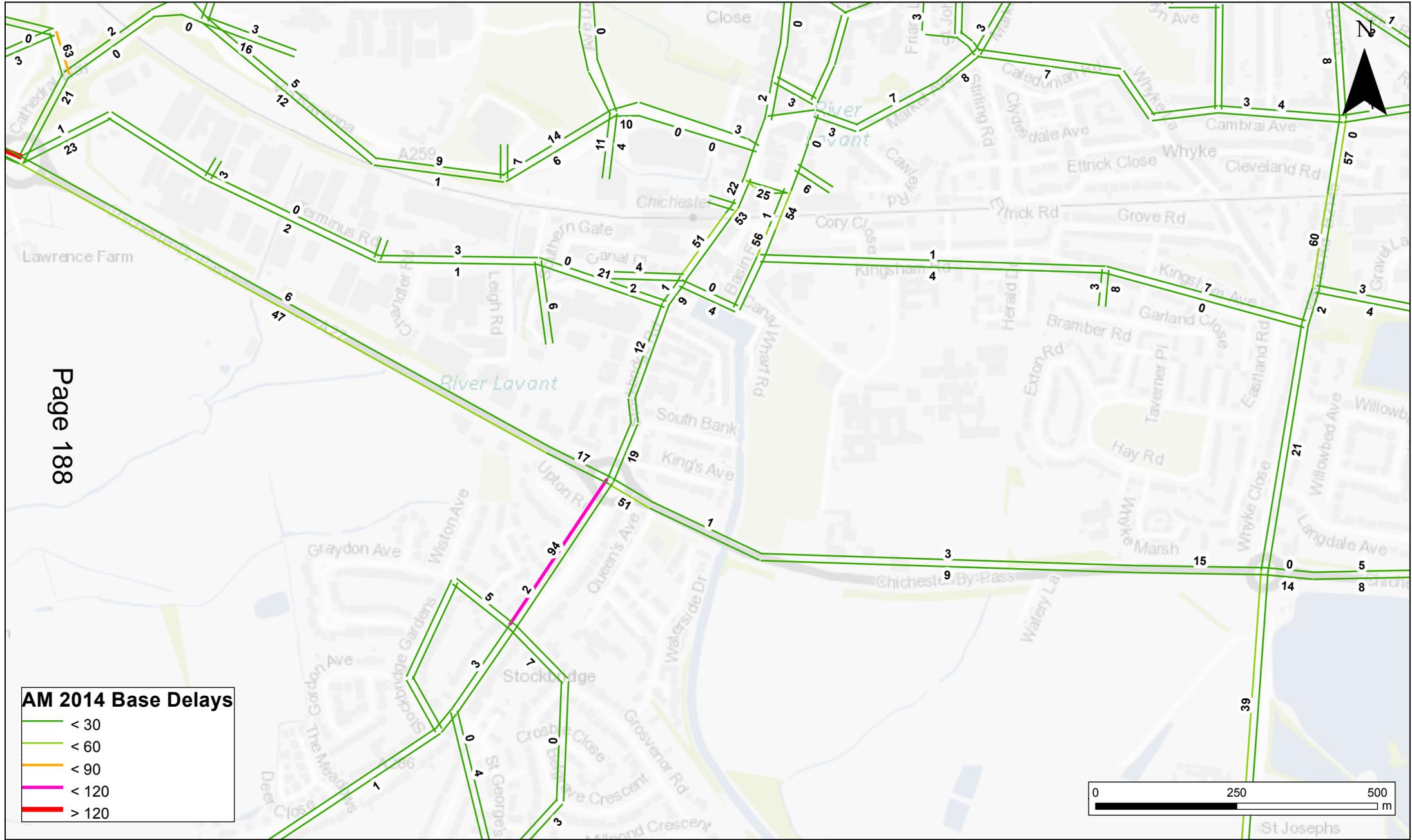

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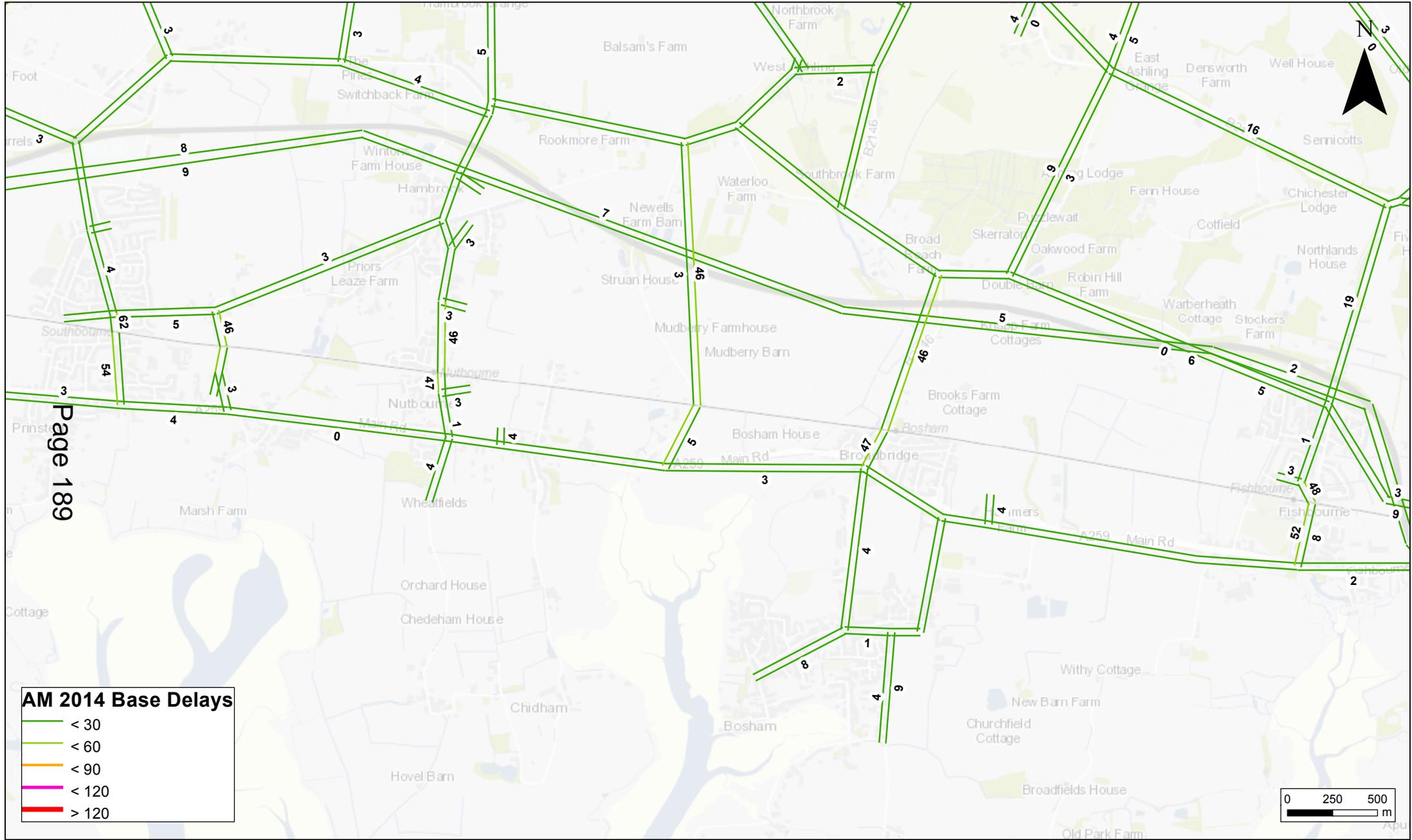


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 A259 Main Road

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Figure 01	Rev A





Page 189

**AM 2014 Base Delays**

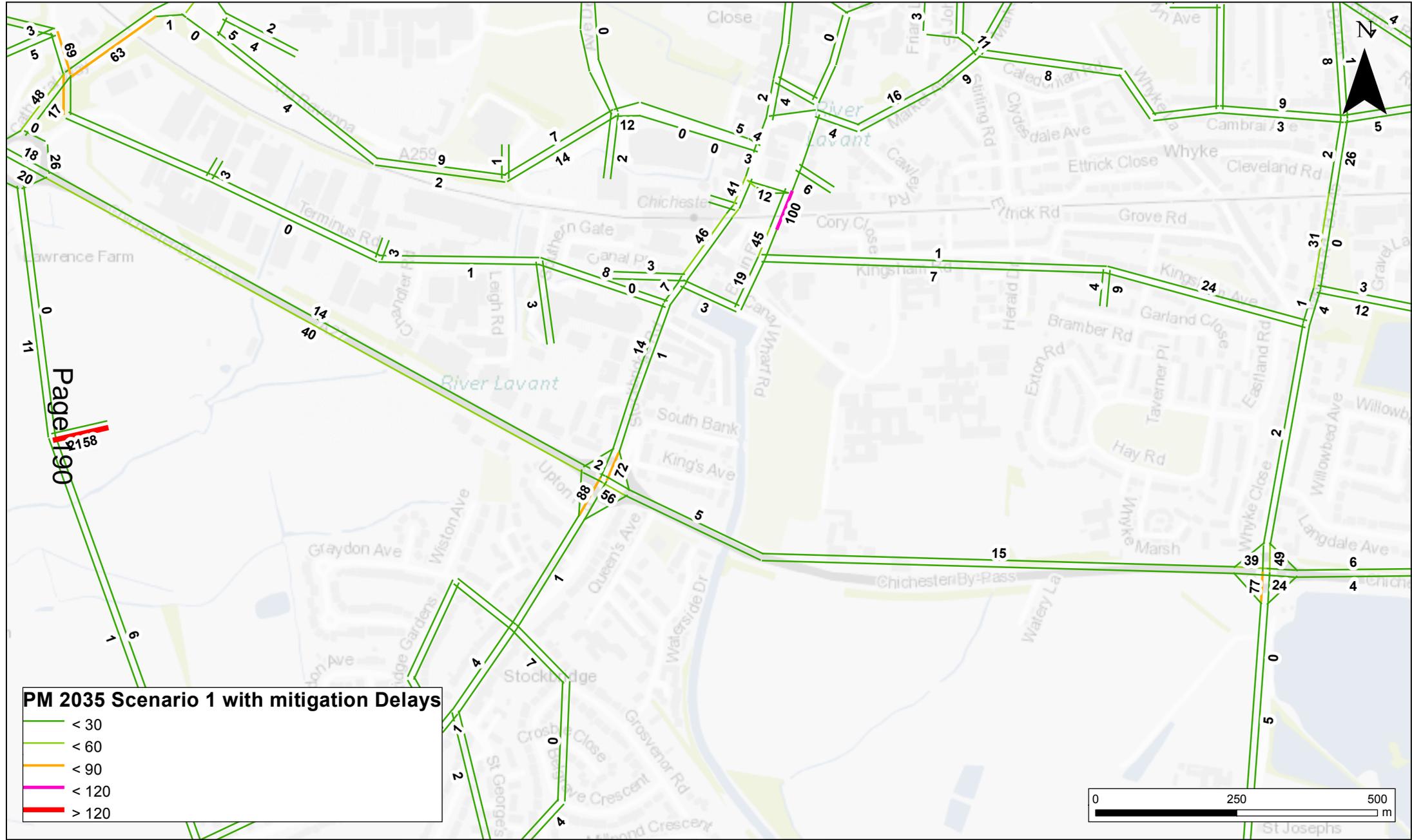
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- < 90
- < 120
- > 120



**Chichester Transport Study**  
**Level Crossing Sensitivity Test**  
 A259 Main Road

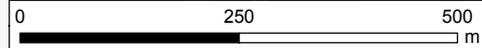
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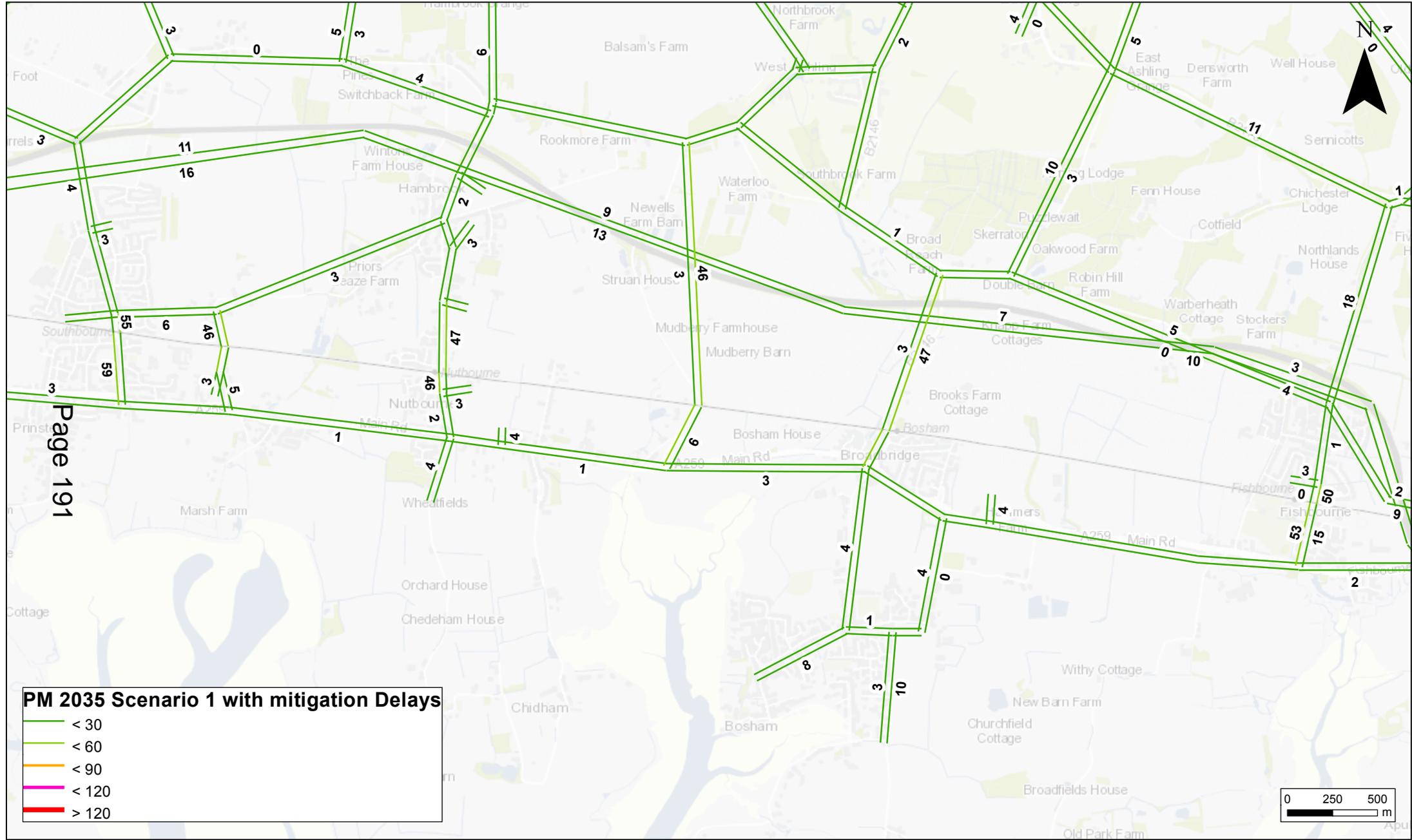
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Figure 01	Rev A



**PM 2035 Scenario 1 with mitigation Delays**

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- < 90
- < 120
- > 120

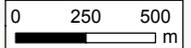


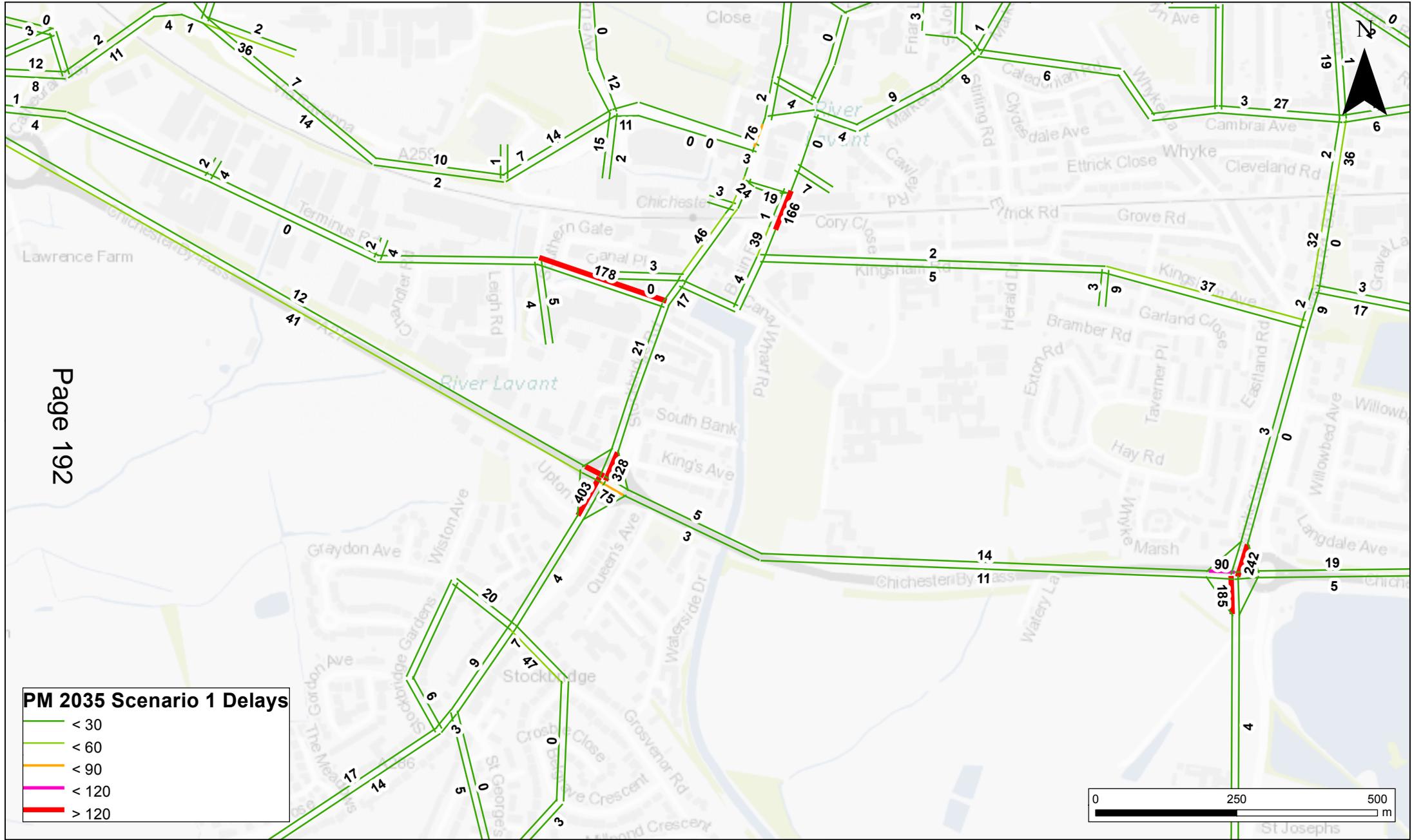


Page 191

**PM 2035 Scenario 1 with mitigation Delays**

- < 30
- < 60
- < 90
- < 120
- > 120

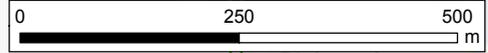




Page 192

**PM 2035 Scenario 1 Delays**

- < 30
- < 60
- < 90
- < 120
- > 120

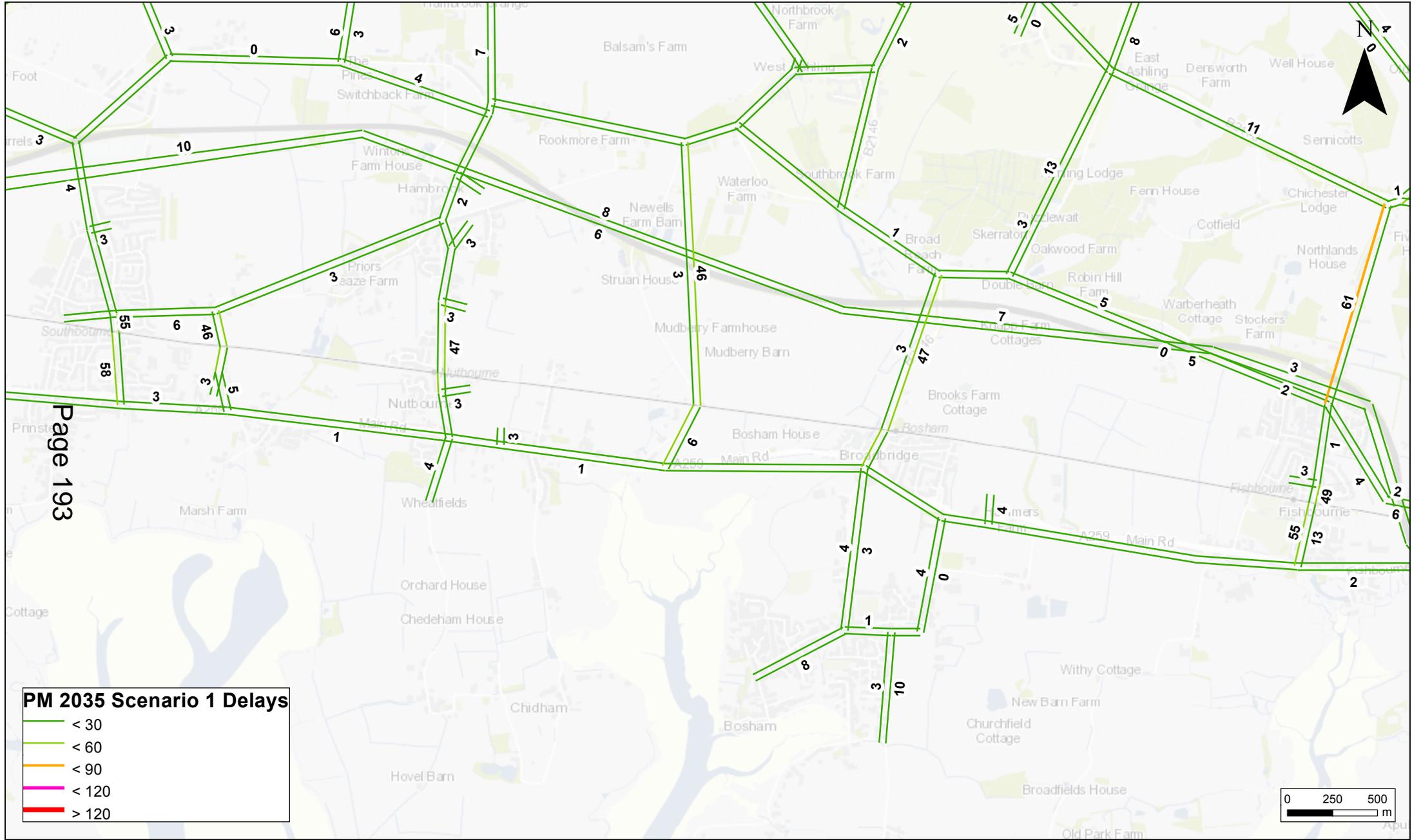


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 Chichester

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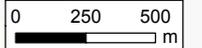
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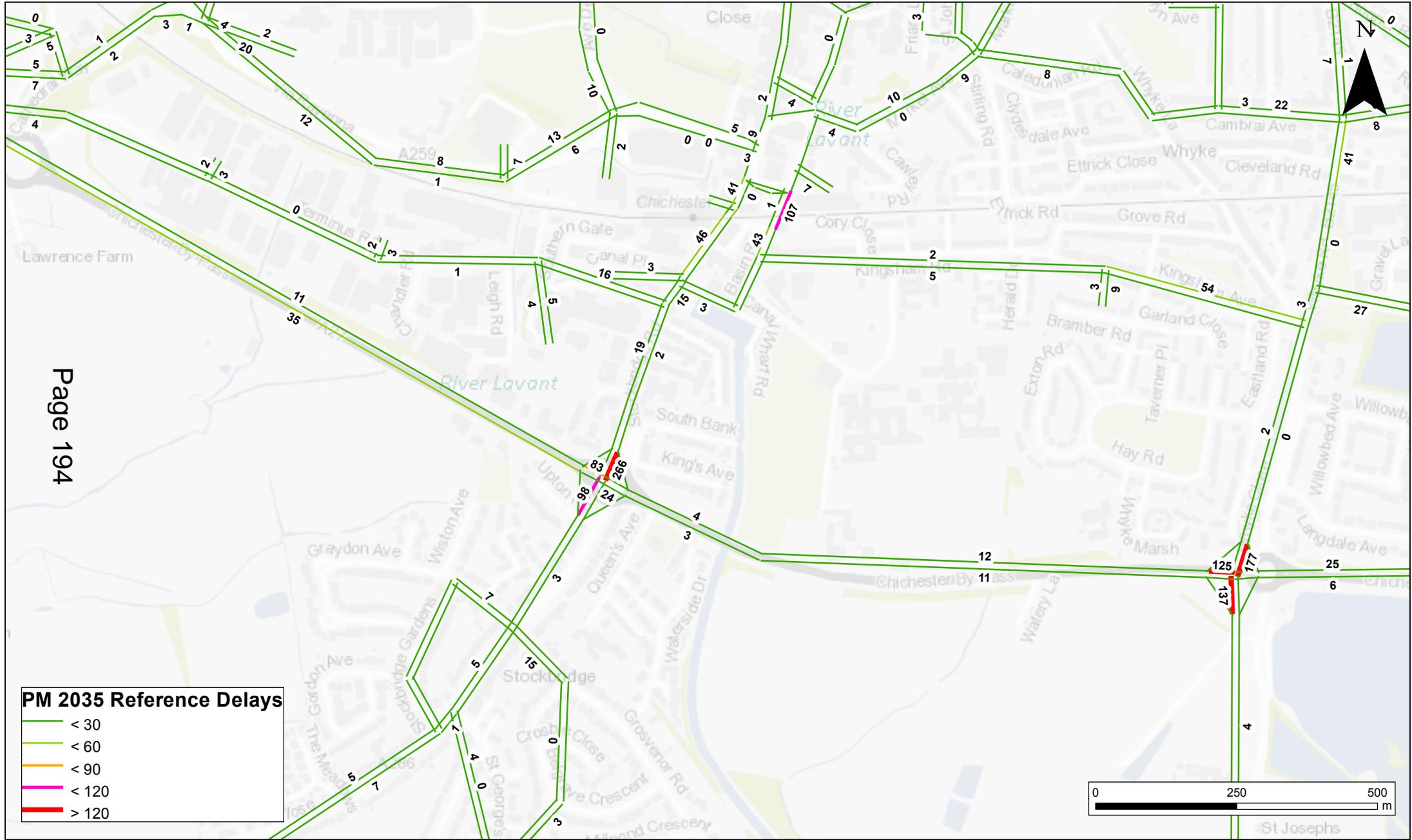


Page 193

**PM 2035 Scenario 1 Delays**

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- < 60
- < 90
- < 120
- > 120

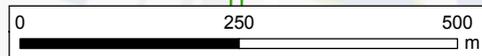




Page 194

**PM 2035 Reference Delays**

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- < 90
- < 120
- > 120

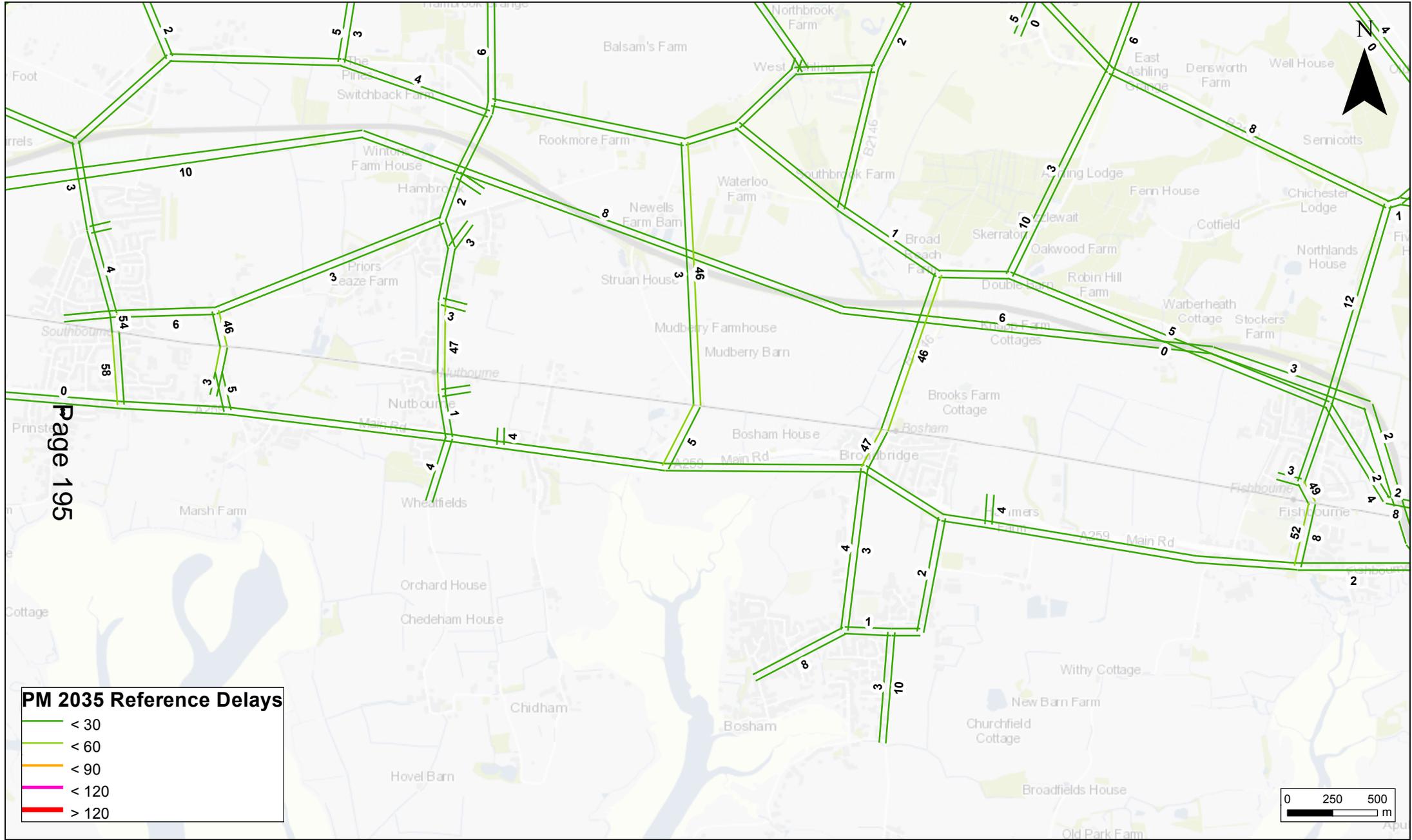


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 Chichester

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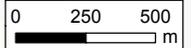
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Figure 01	Rev A



Page 195

**PM 2035 Reference Delays**

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- < 90
- < 120
- > 120



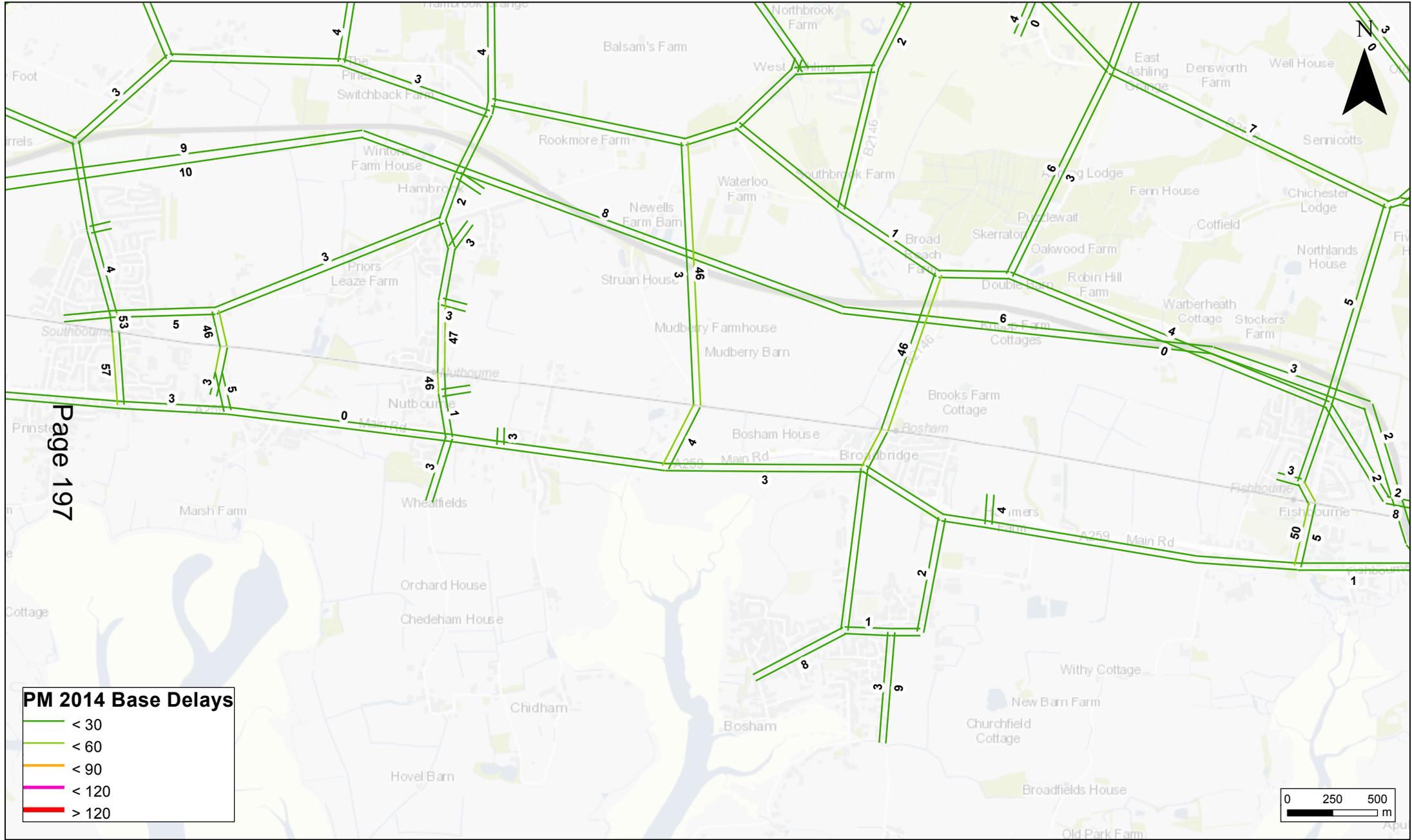
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**Chichester Transport Study**  
**Level Crossing Sensitivity Test**  
 A259 Main Road

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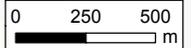




Page 197

**PM 2014 Base Delays**

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- < 60
- < 90
- < 120
- > 120

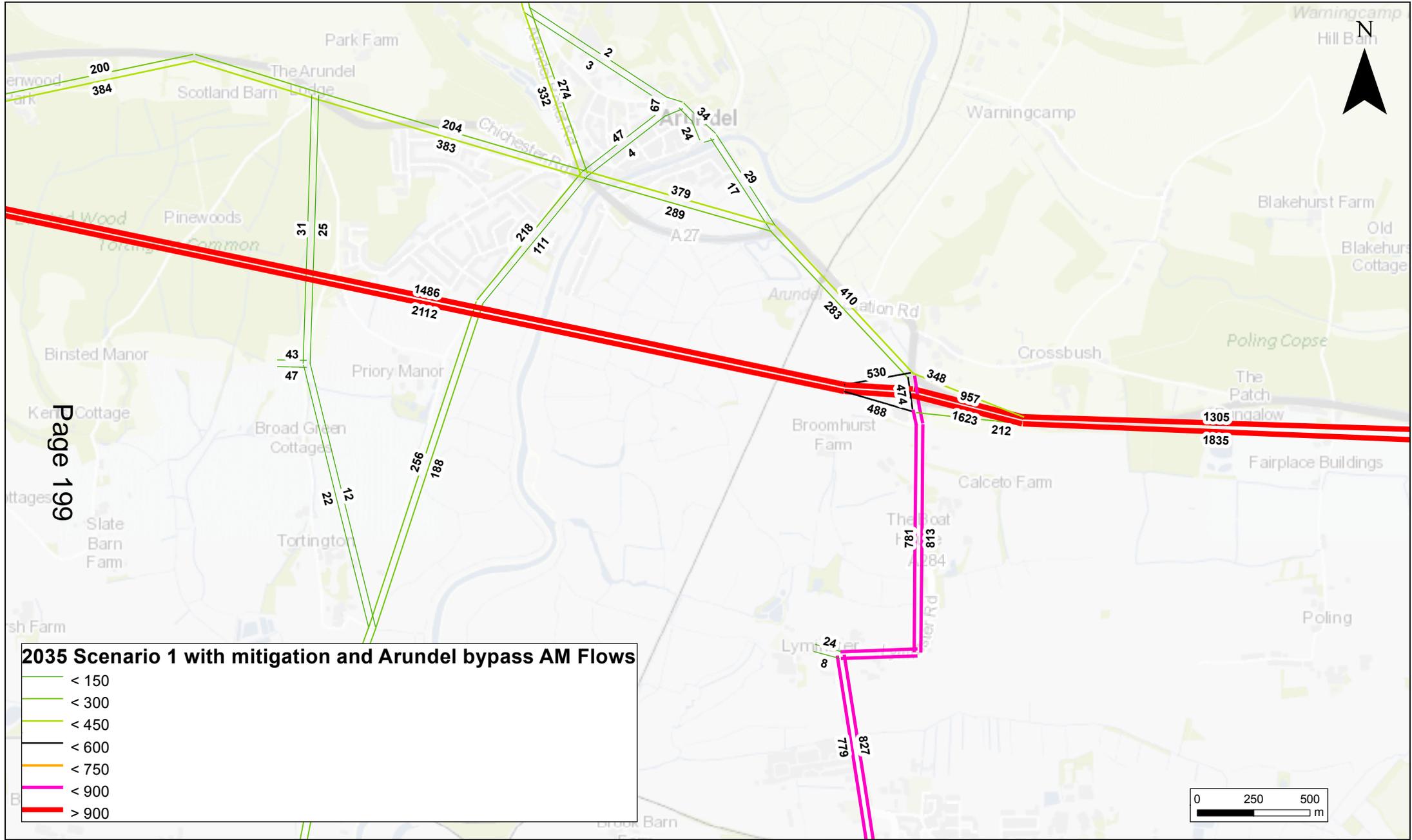


**Chichester Transport Study  
Level Crossing Sensitivity Test**  
A259 Main Road

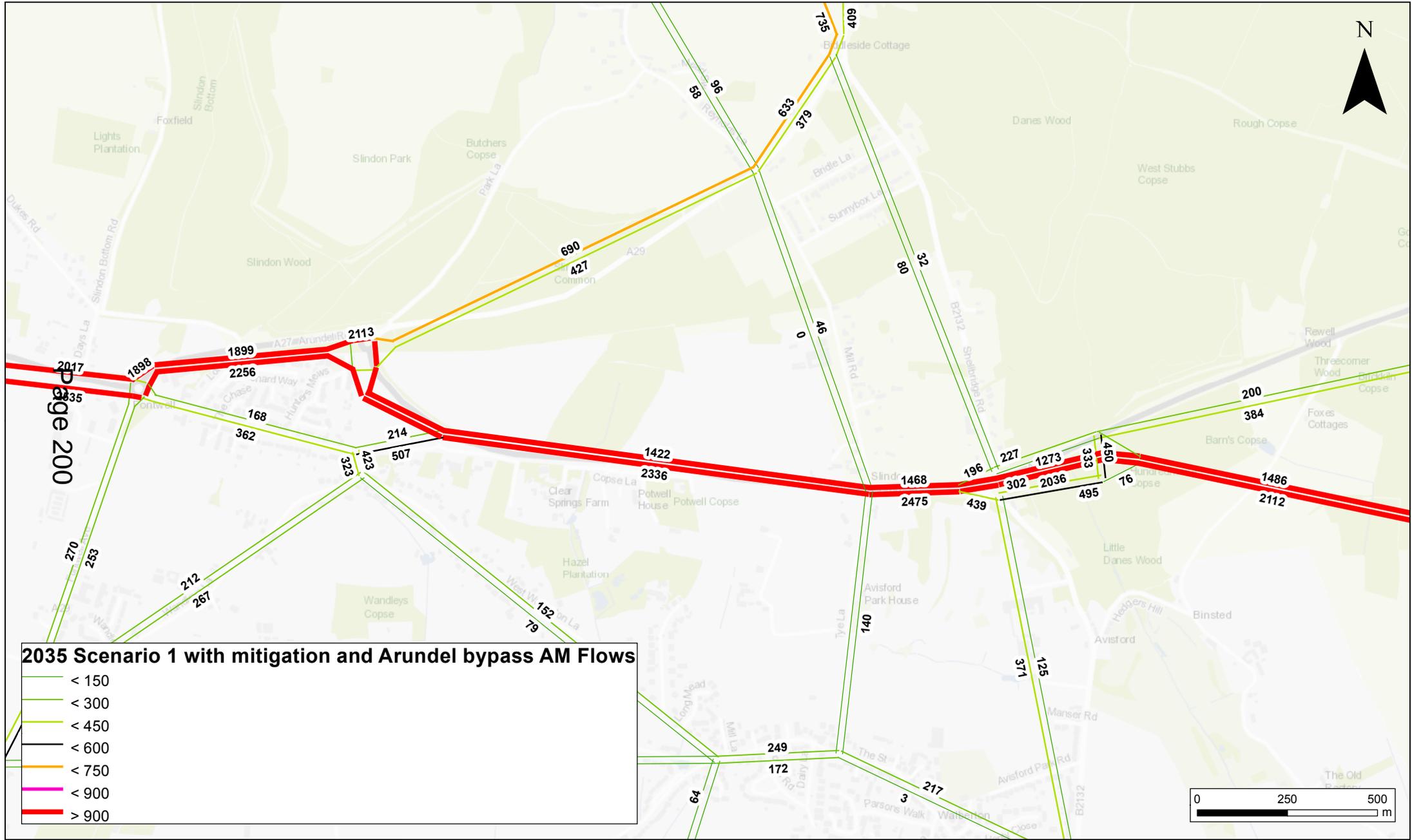
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## Appendix A2 Impact of Arundel Bypass



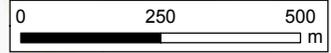
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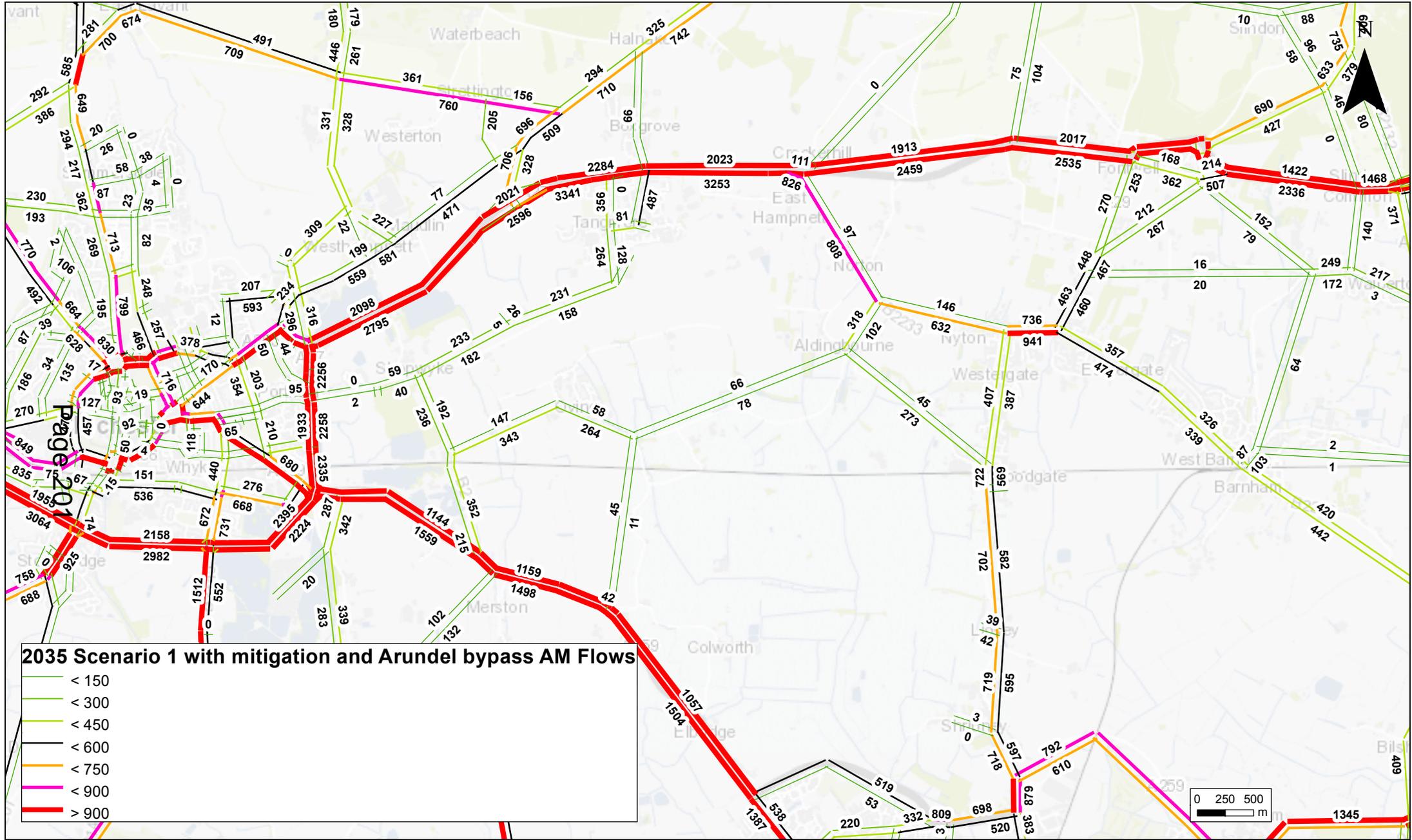


Page 200

**2035 Scenario 1 with mitigation and Arundel bypass AM Flows**

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- < 600
- < 750
- < 900
- > 900

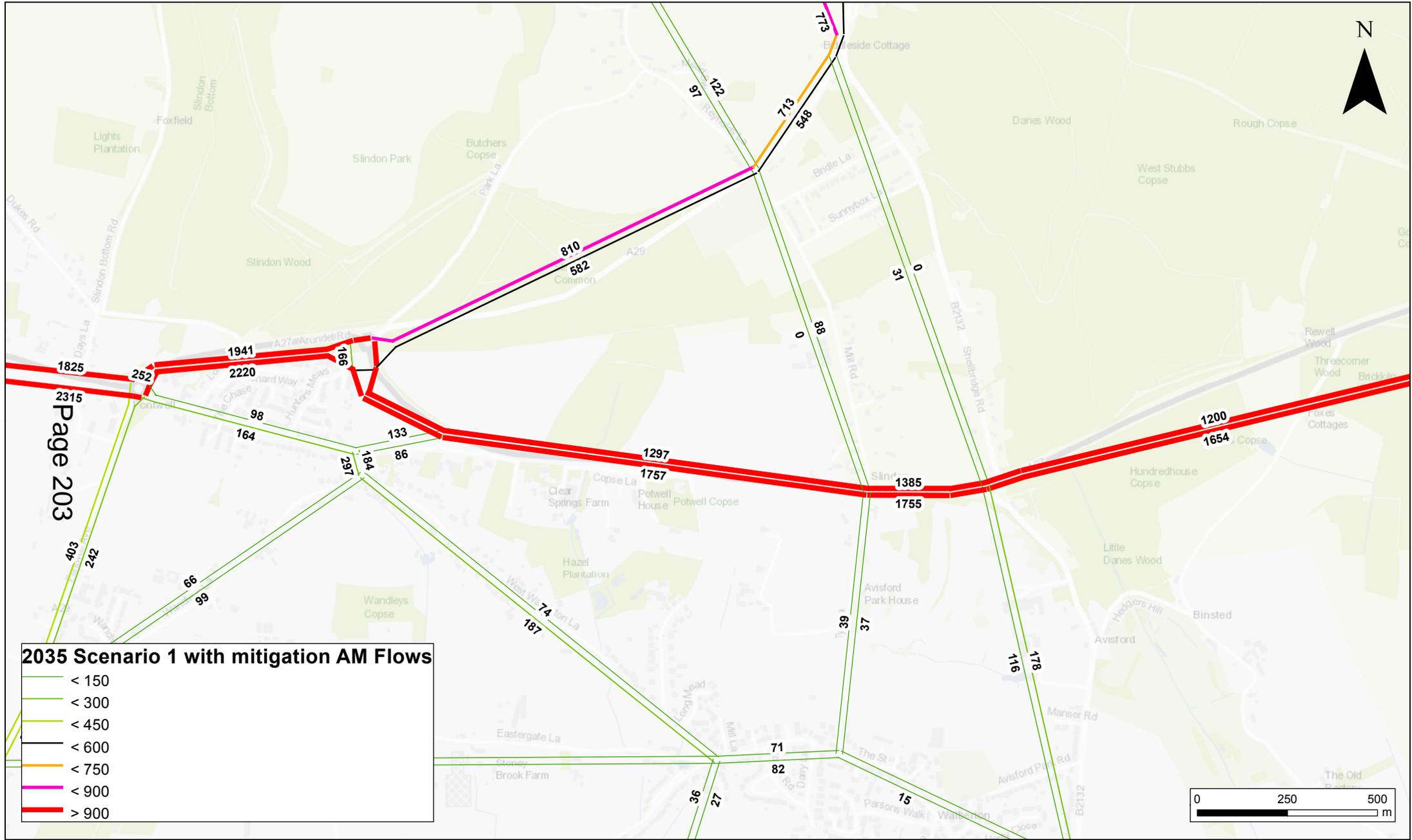




**2035 Scenario 1 with mitigation and Arundel bypass AM Flows**

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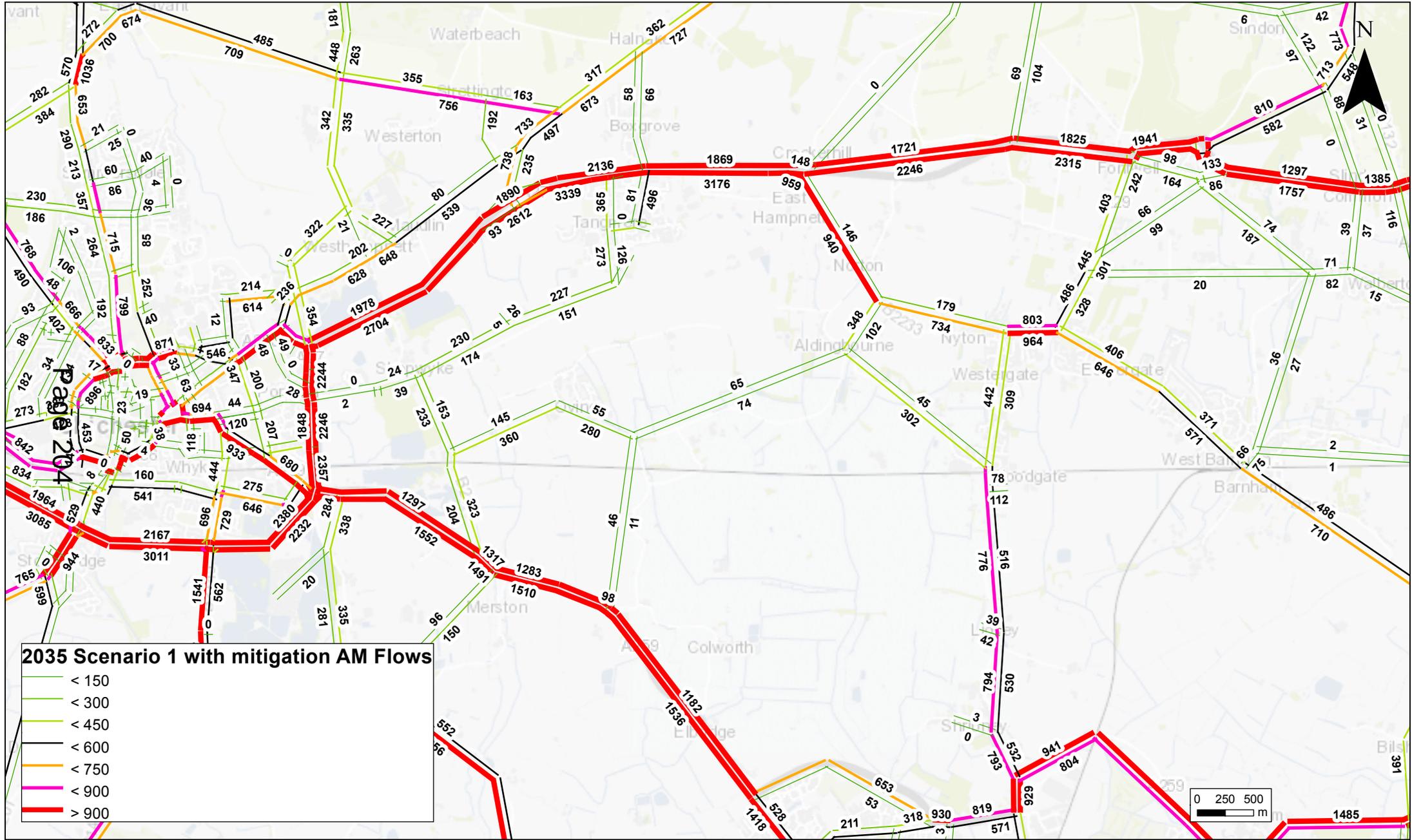




Page 203

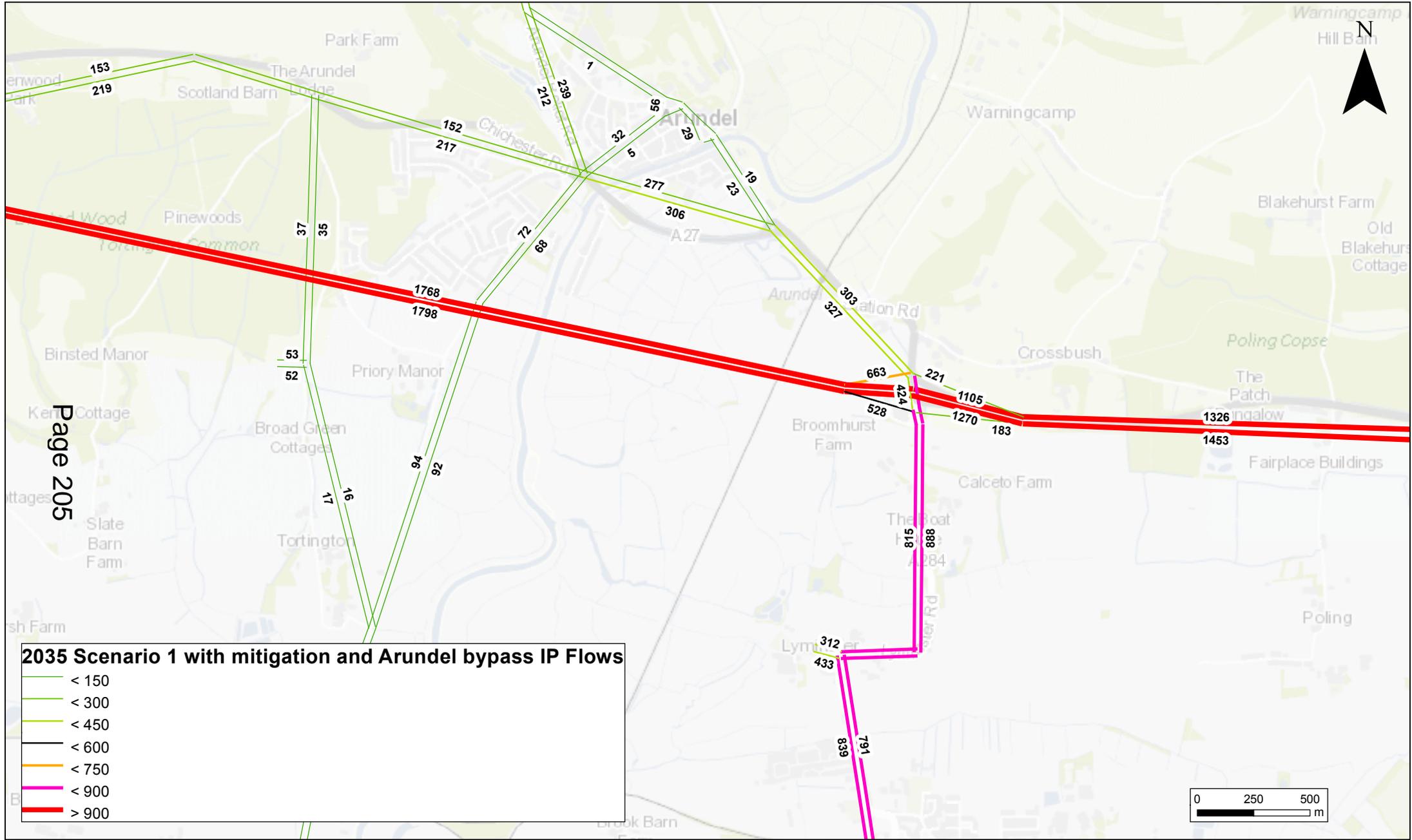
**2035 Scenario 1 with mitigation AM Flows**

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- > 900



**2035 Scenario 1 with mitigation AM Flows**

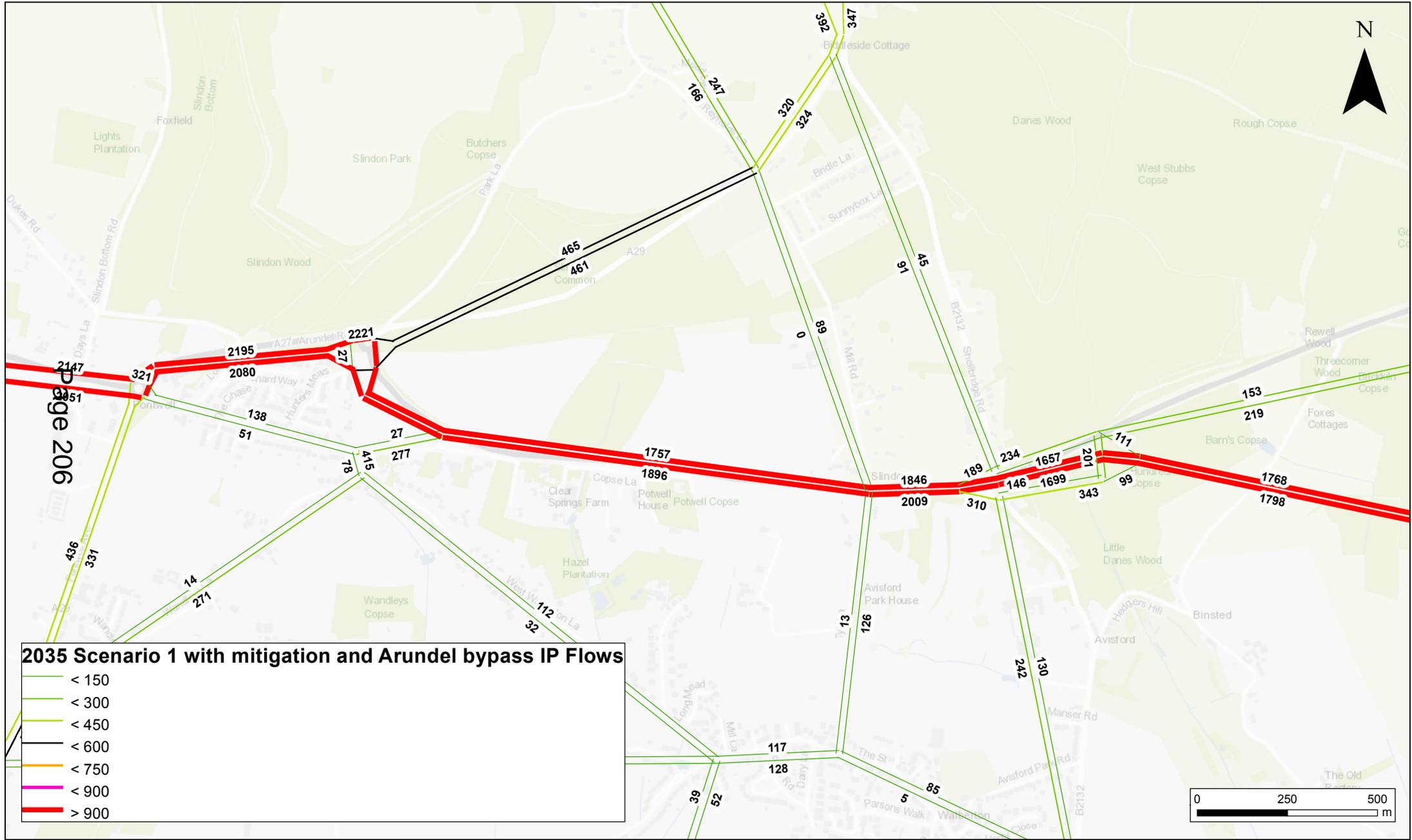
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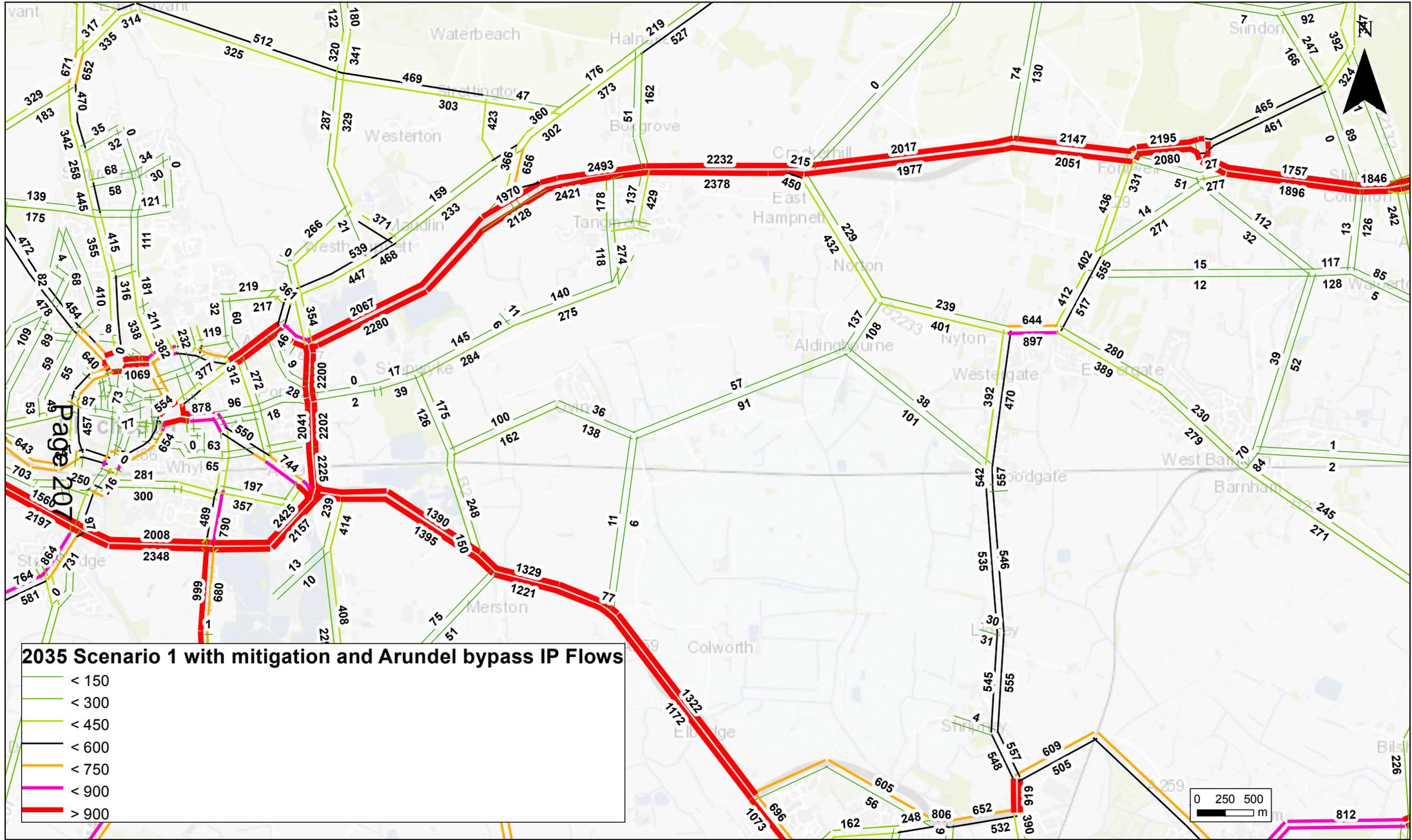


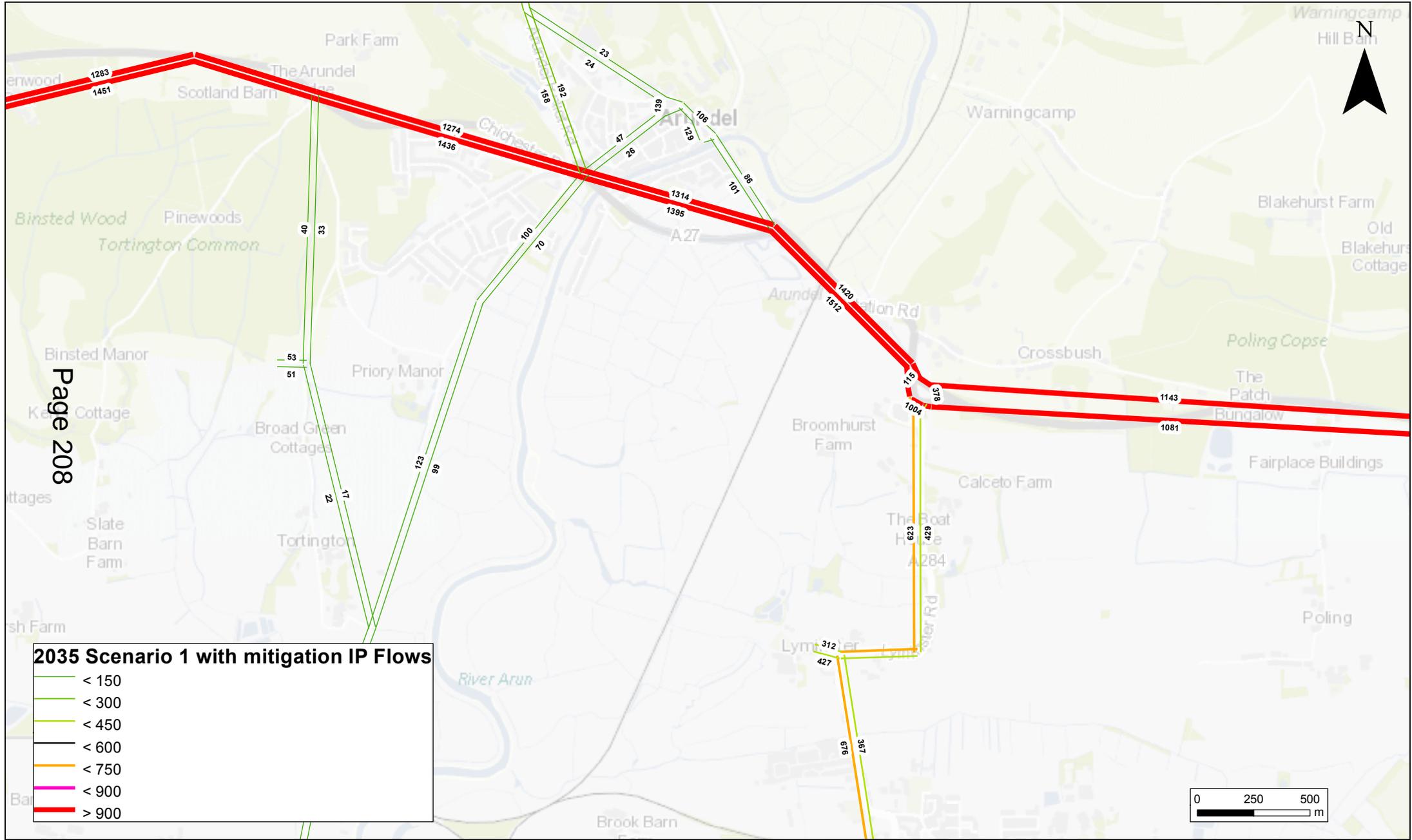
**2035 Scenario 1 with mitigation and Arundel bypass IP Flows**

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- < 450
- < 600
- < 750
- < 900
- > 900

Page 205



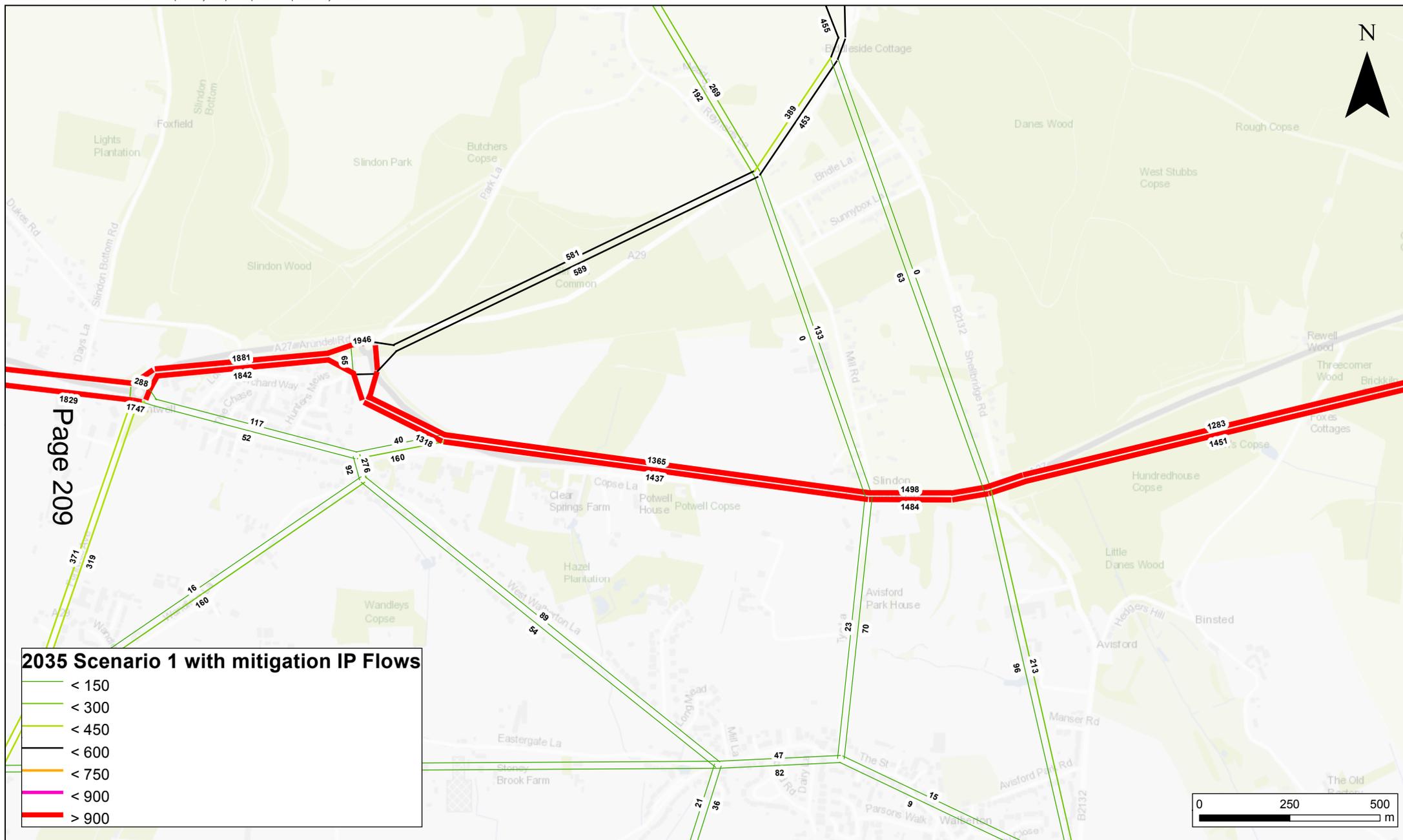




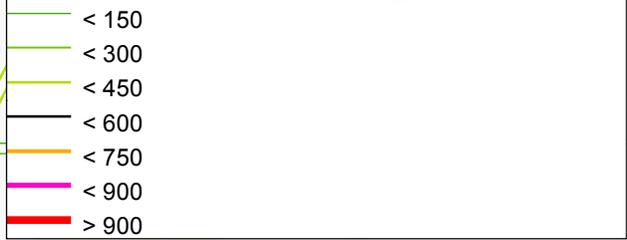
Page 208

**2035 Scenario 1 with mitigation IP Flows**

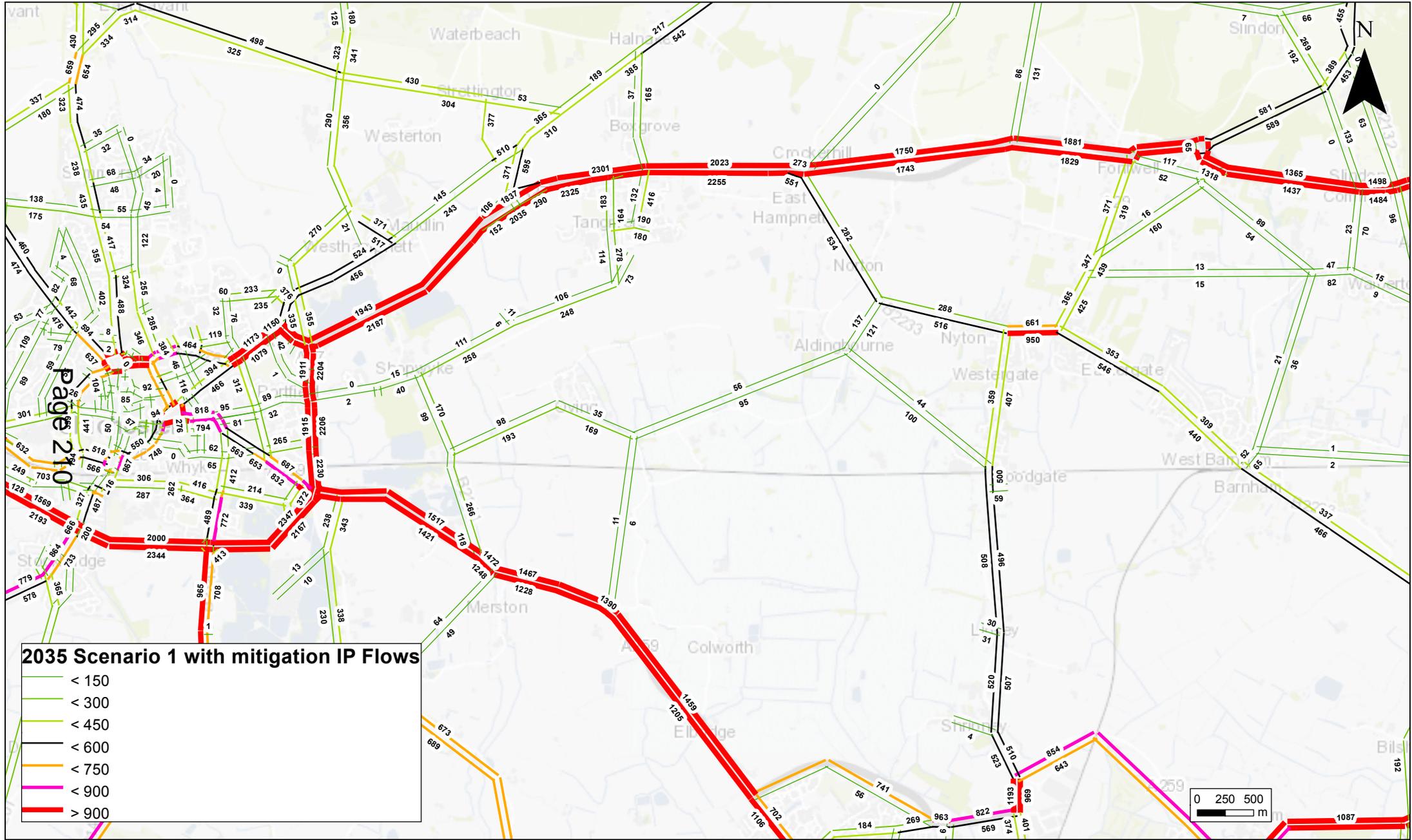
- < 150
- < 300
- < 450
- < 600
- < 750
- < 900
- > 900



**2035 Scenario 1 with mitigation IP Flows**



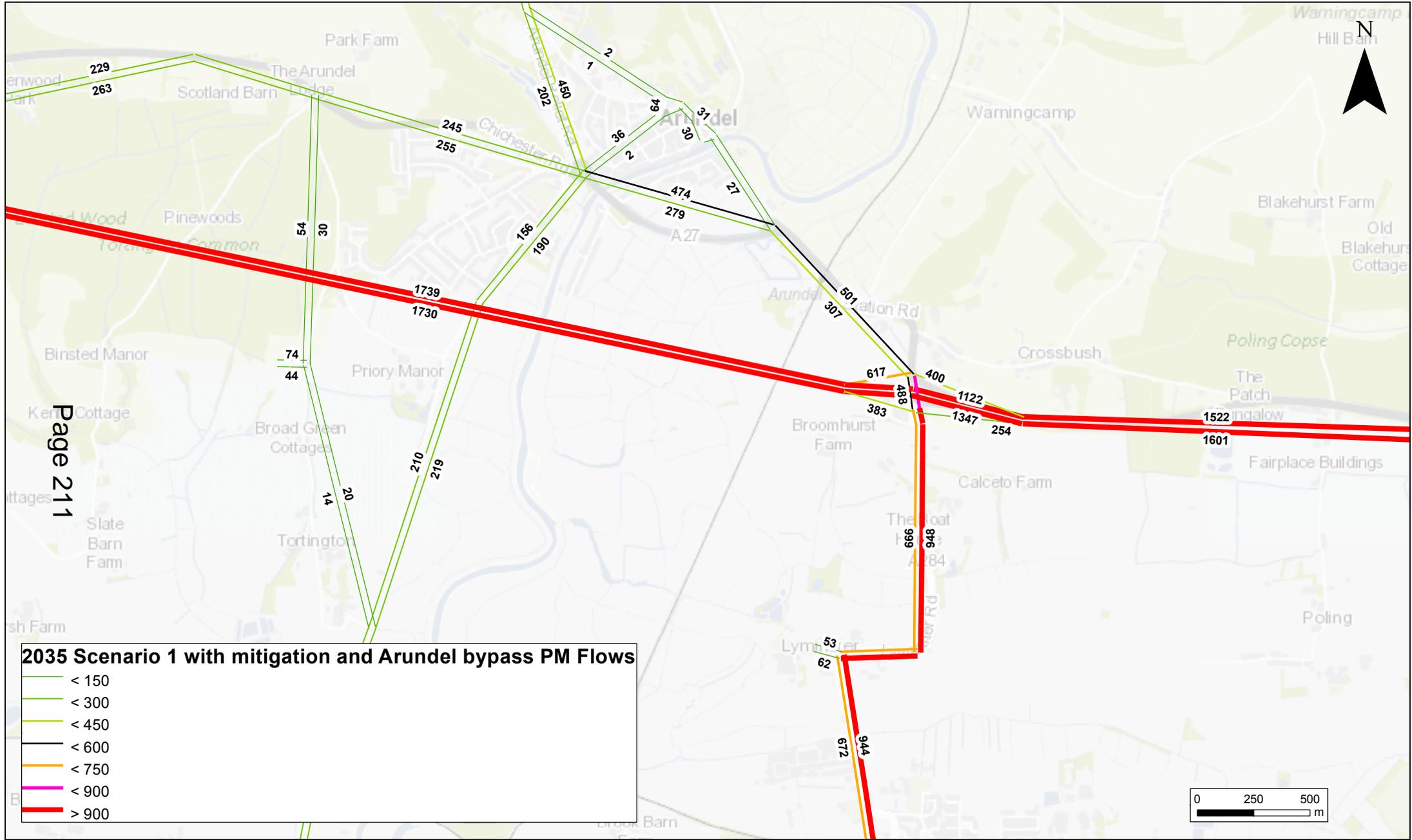
Page 209



**2035 Scenario 1 with mitigation IP Flows**

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- > 900

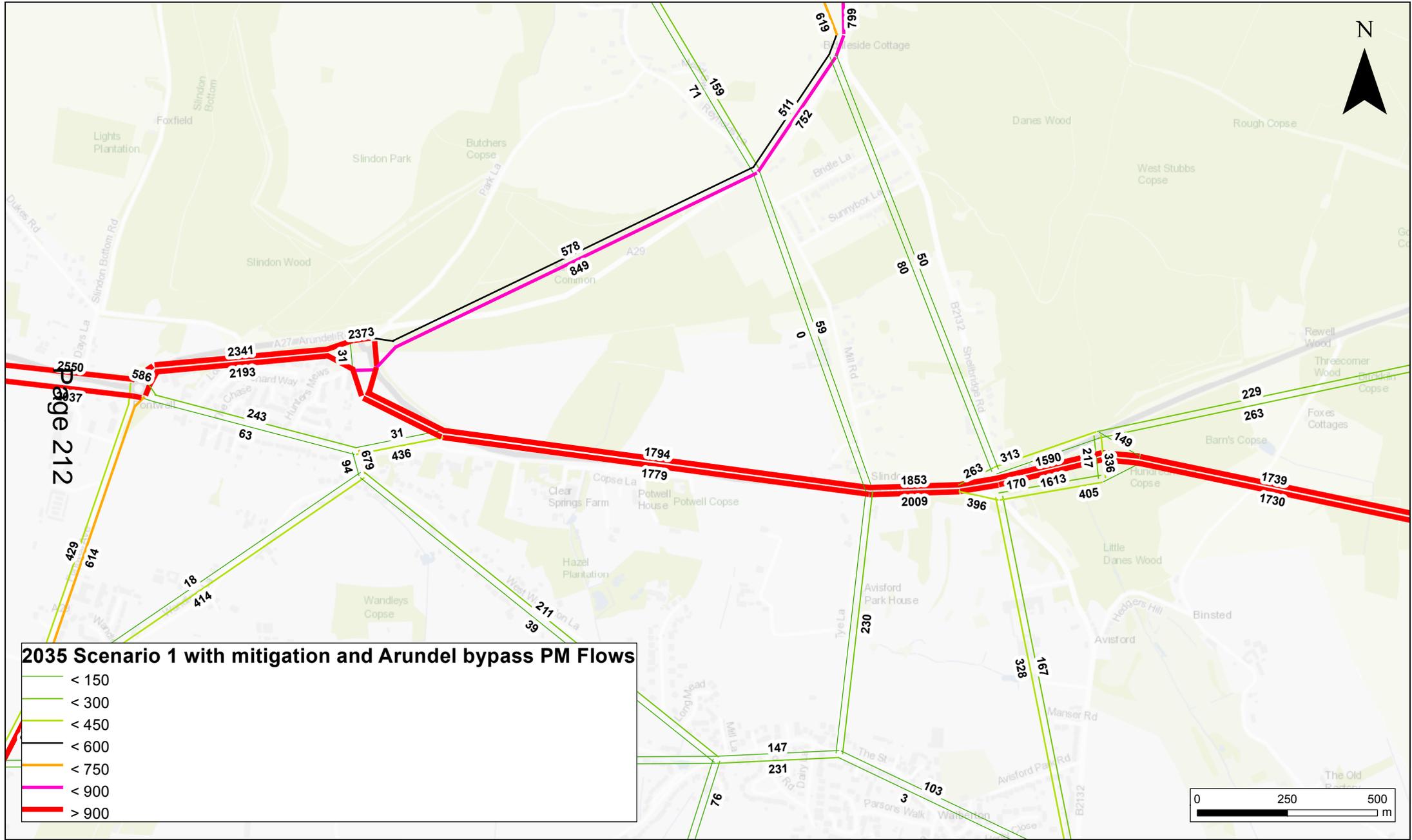
Page 210



**2035 Scenario 1 with mitigation and Arundel bypass PM Flows**

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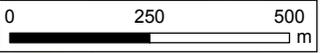
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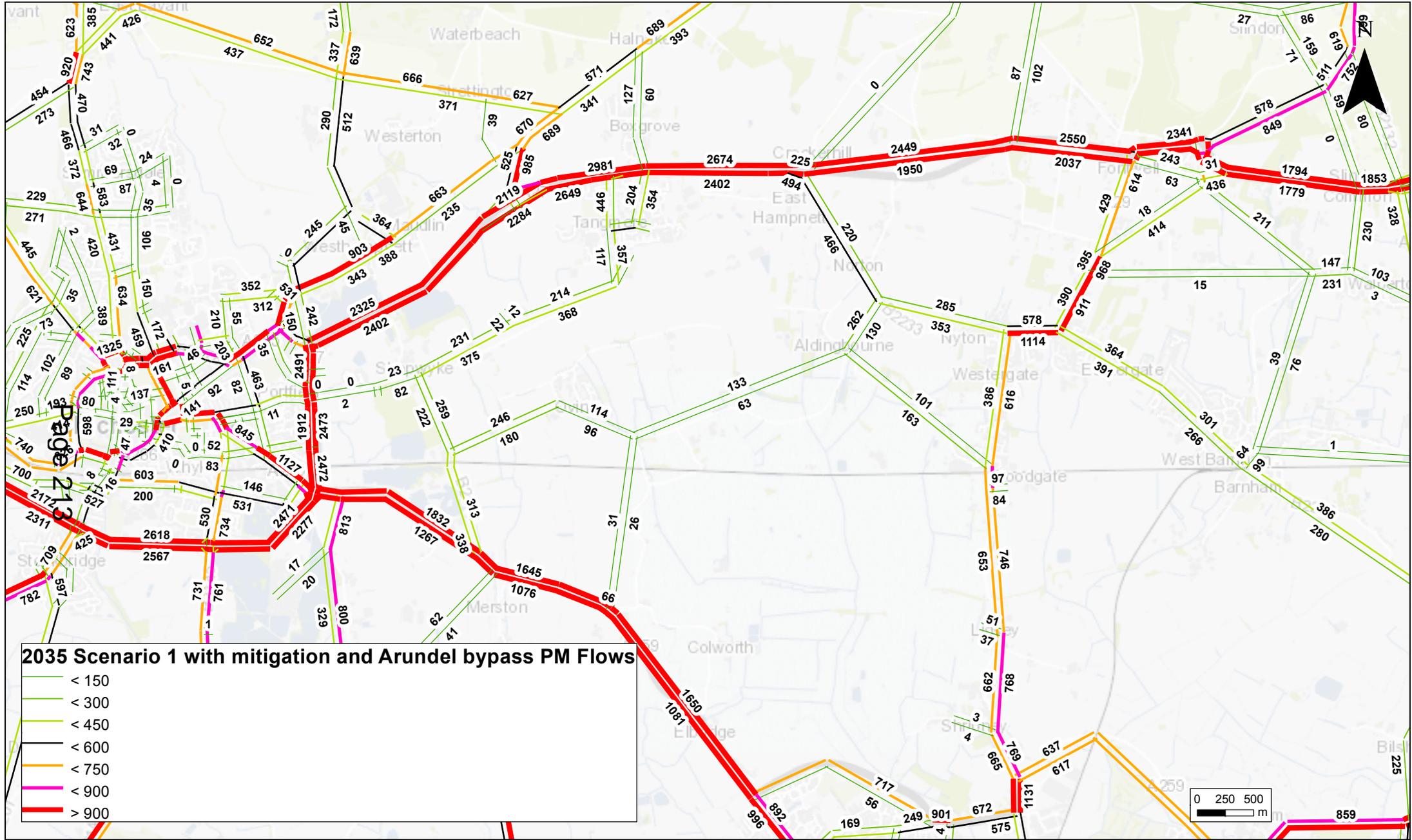


Page 212

**2035 Scenario 1 with mitigation and Arundel bypass PM Flows**

- < 150
- < 300
- < 450
- < 600
- < 750
- < 900
- > 900





2035 Scenario 1 with mitigation and Arundel bypass PM Flows

- < 150
- < 300
- < 450
- < 600
- < 750
- < 900
- > 900



now part of



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**Chichester Transport Study**  
**Arundel Bypass Sensitivity Test**  
 Option 5A - Wide

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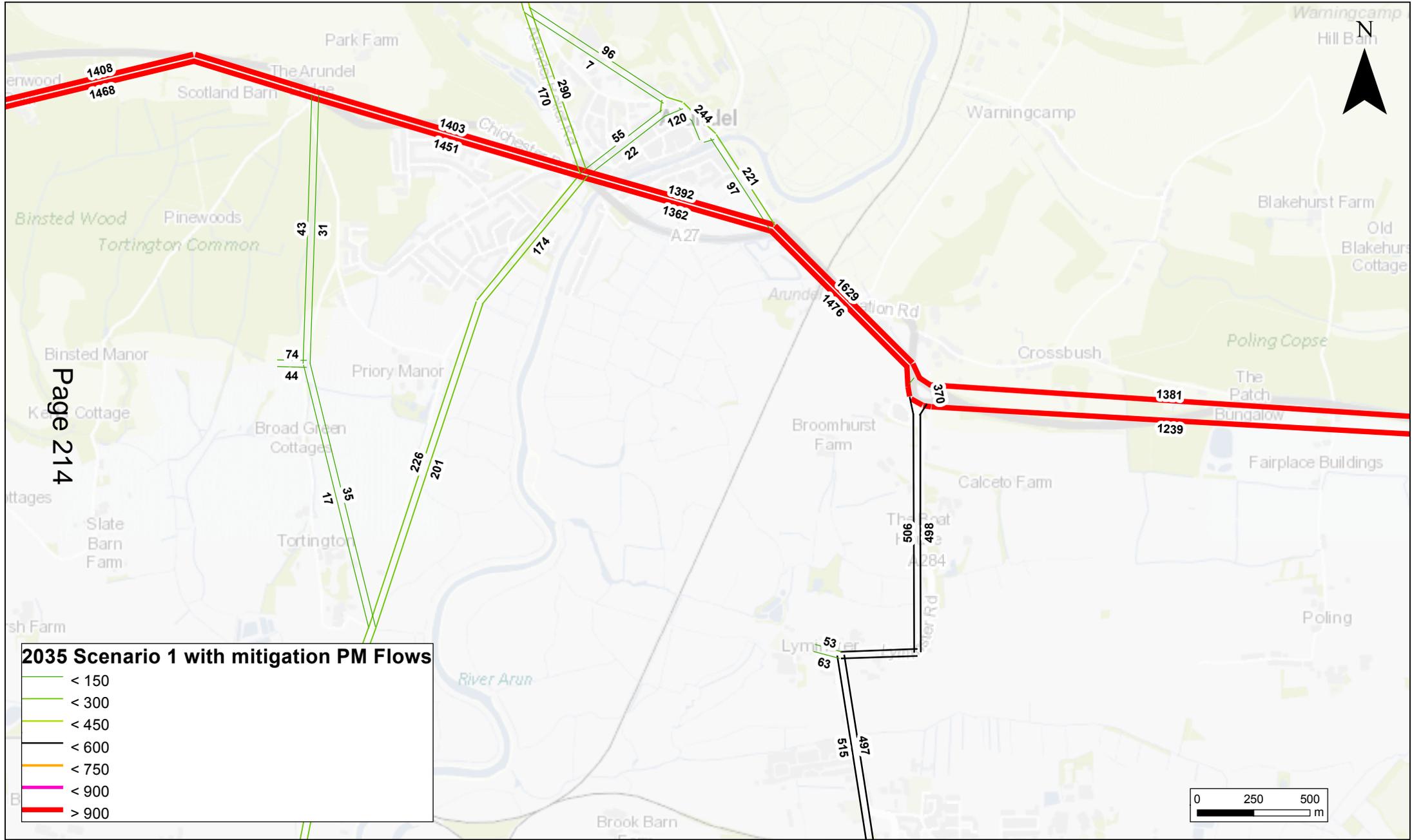
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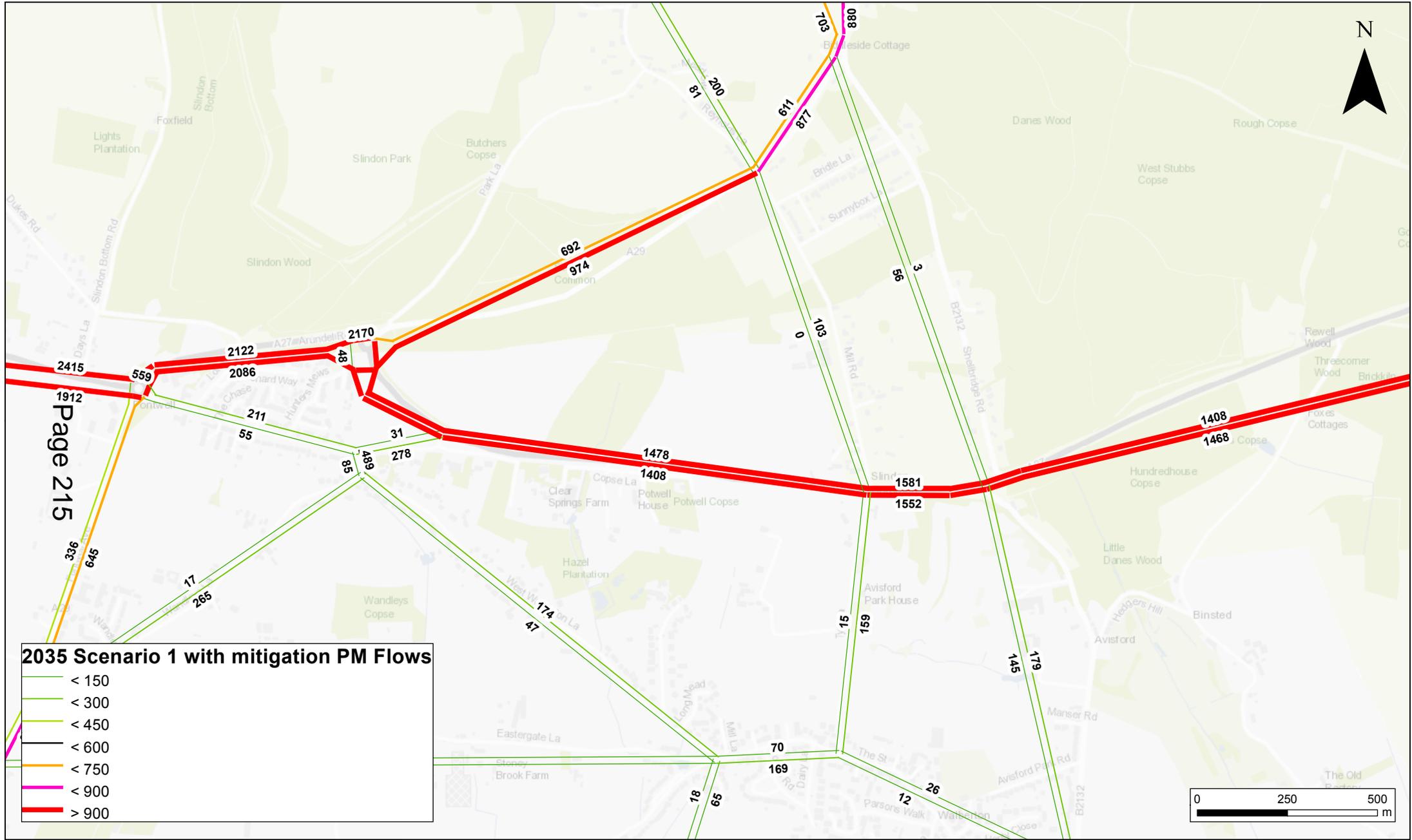
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Figure 01

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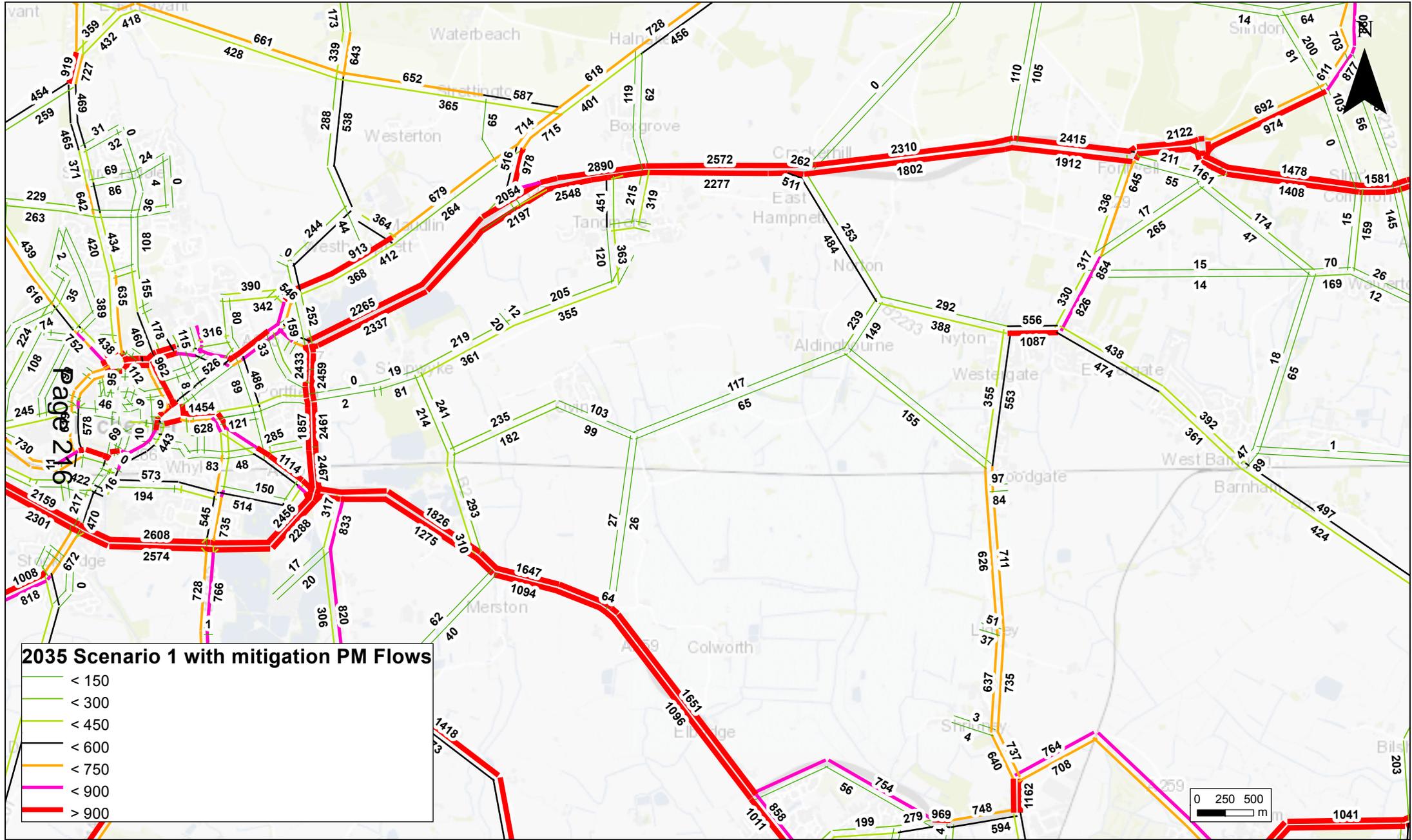
Page 214



**2035 Scenario 1 with mitigation PM Flows**

- < 150
- < 300
- < 450
- < 600
- < 750
- < 900
- > 900

Page 215



**2035 Scenario 1 with mitigation PM Flows**

- < 150
- < 300
- < 450
- < 600
- < 750
- < 900
- > 900

0 250 500 m



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Option 5A - Wide**

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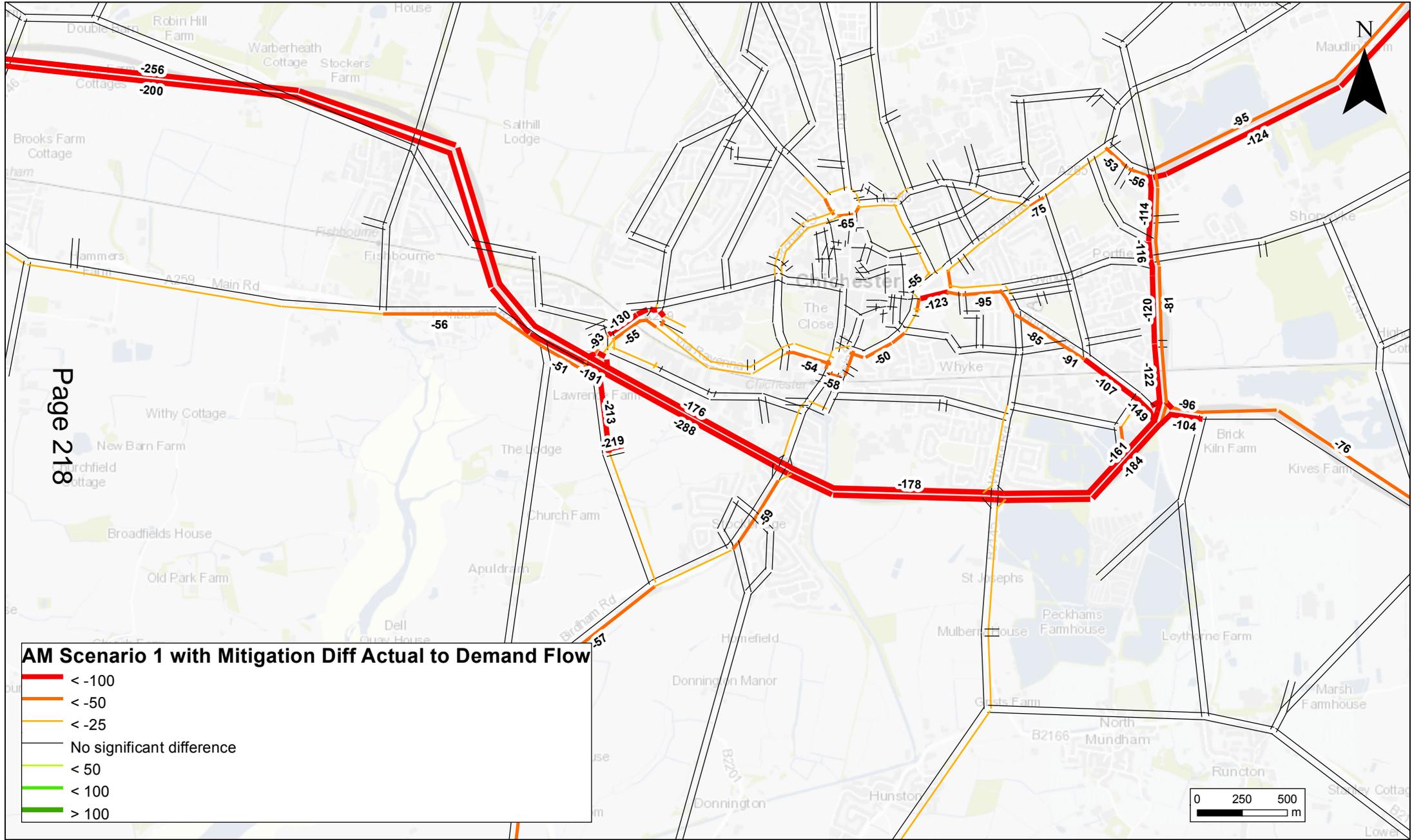
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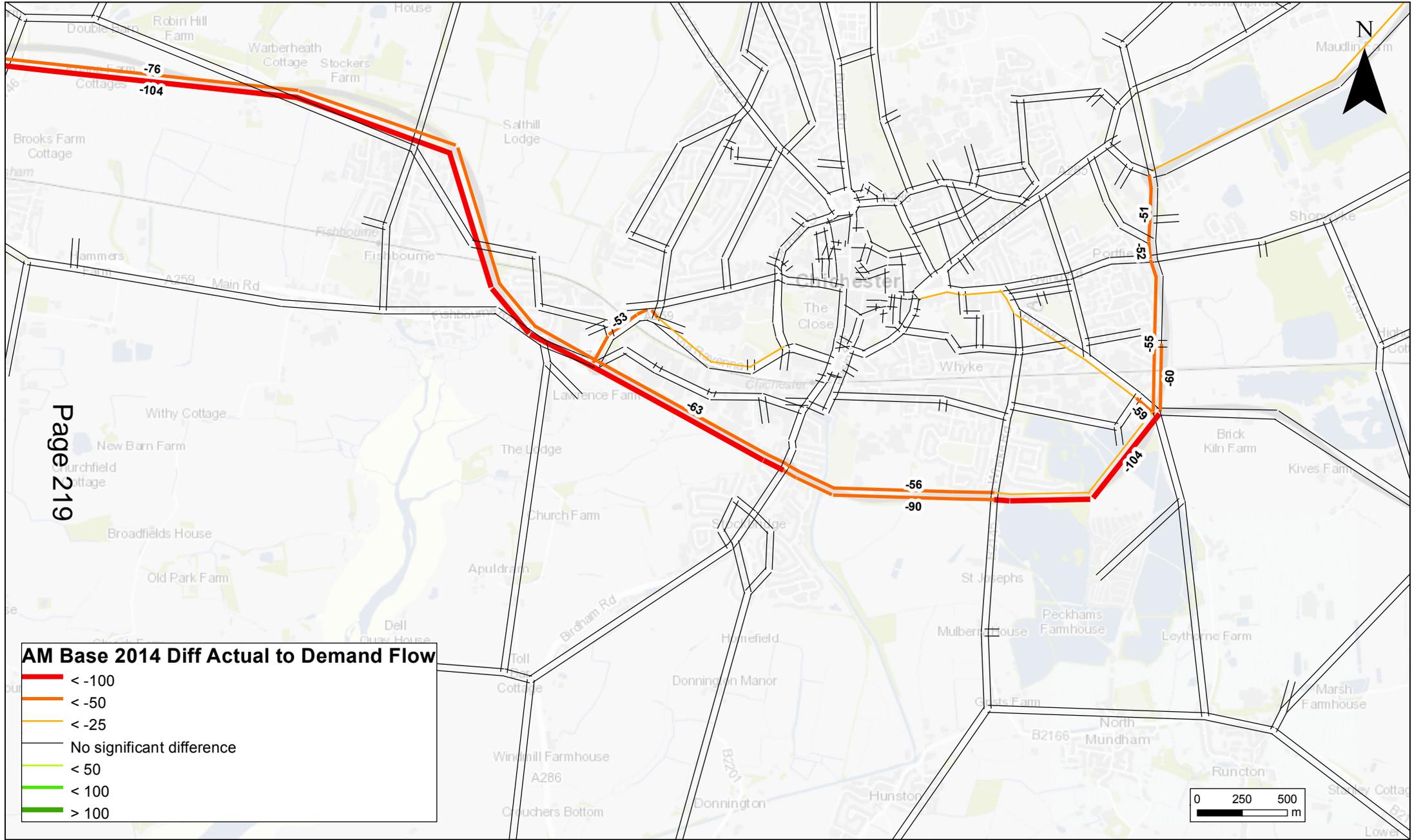
Figure 01

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## Appendix A3 Impact of Peak Spreading



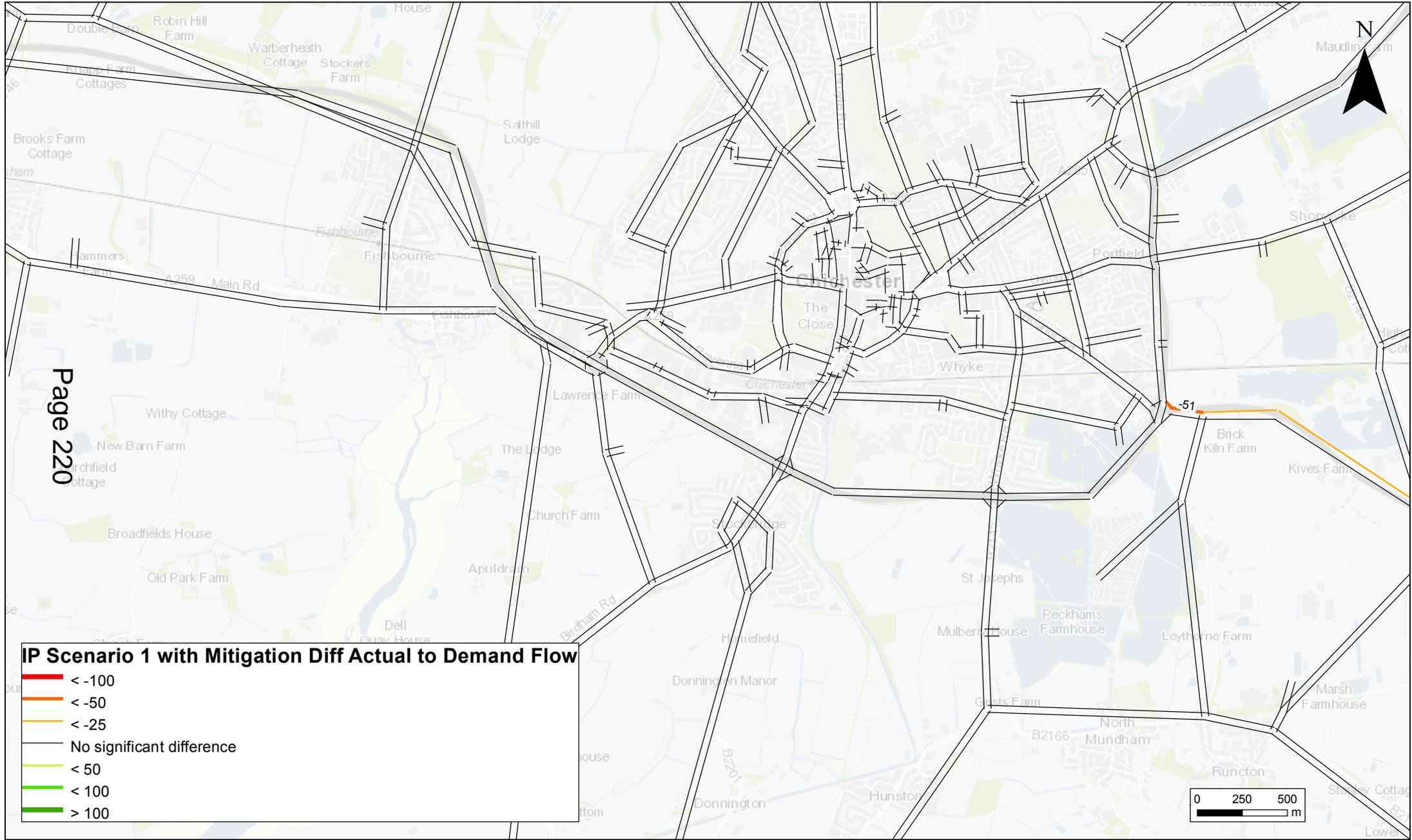
Page 218



Page 219

**AM Base 2014 Diff Actual to Demand Flow**

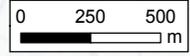
- █ < -100
- █ < -50
- █ < -25
- No significant difference
- █ < 50
- █ < 100
- █ > 100

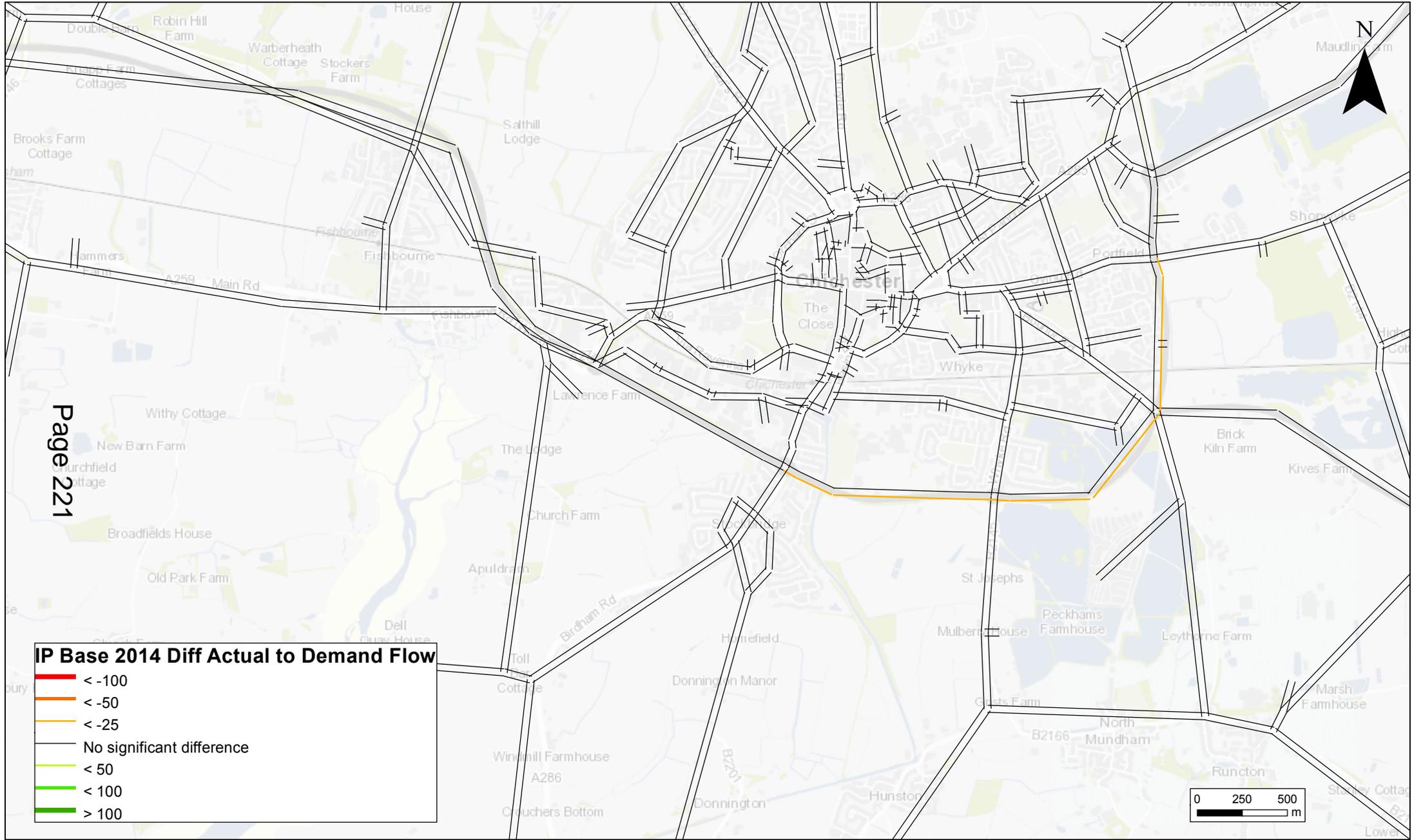


Page 220

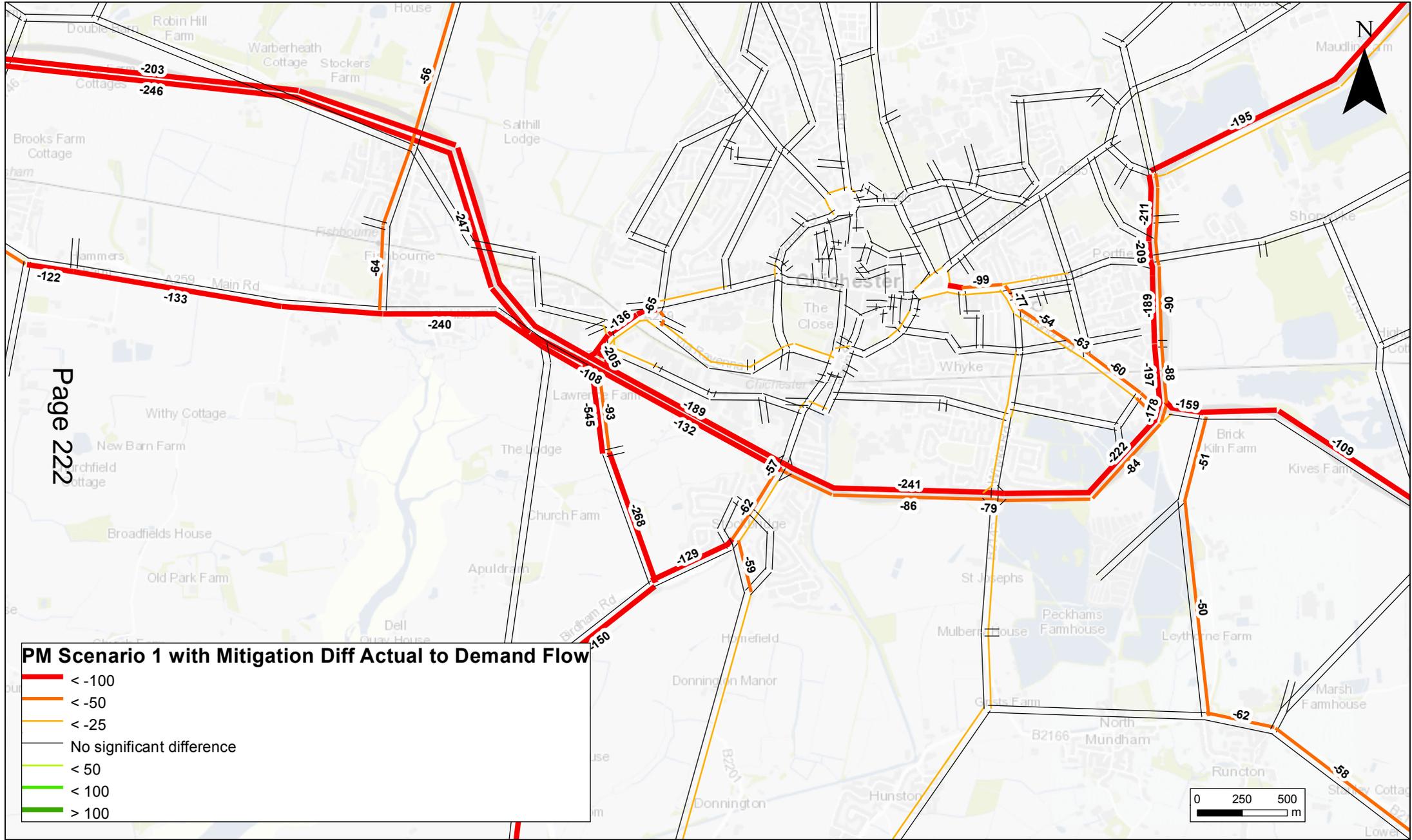
**IP Scenario 1 with Mitigation Diff Actual to Demand Flow**

- █ < -100
- █ < -50
- █ < -25
- No significant difference
- █ < 50
- █ < 100
- █ > 100





Page 221

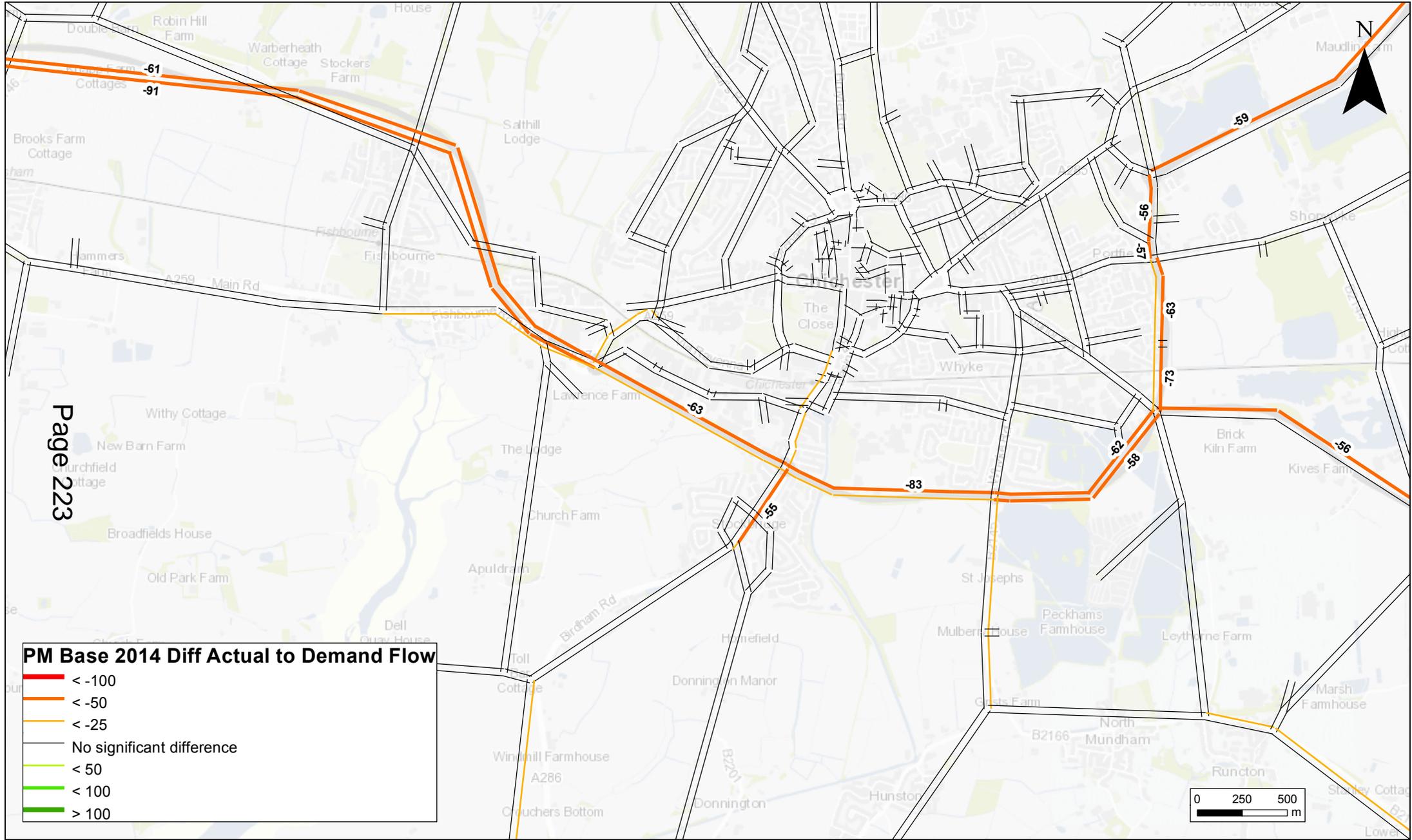


Page 222

**PM Scenario 1 with Mitigation Diff Actual to Demand Flow**

- < -100
- < -50
- < -25
- No significant difference
- < 50
- < 100
- > 100





Page 223

**PM Base 2014 Diff Actual to Demand Flow**

- █ < -100
- █ < -50
- █ < -25
- No significant difference
- █ < 50
- █ < 100
- █ > 100



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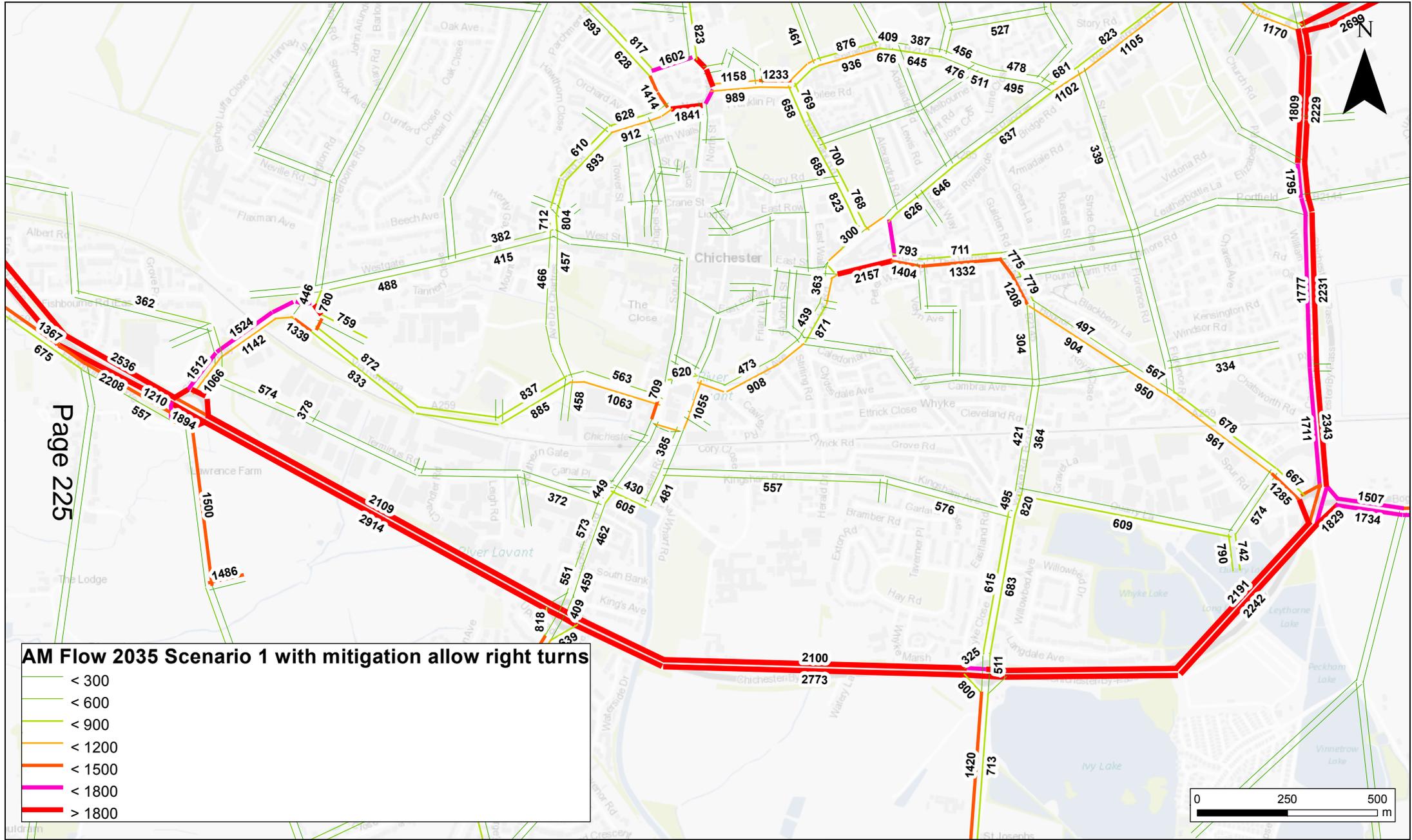
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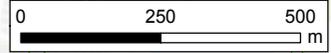
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## **Appendix A4 Impact of Allowing Right Turns at A27 Junctions and on Local Traffic**



**AM Flow 2035 Scenario 1 with mitigation allow right turns**

- < 300
- < 600
- < 900
- < 1200
- < 1500
- < 1800
- > 1800



**Chichester Transport Study**  
**Allow A27 right turns Sensitivity Test**  
 Chichester

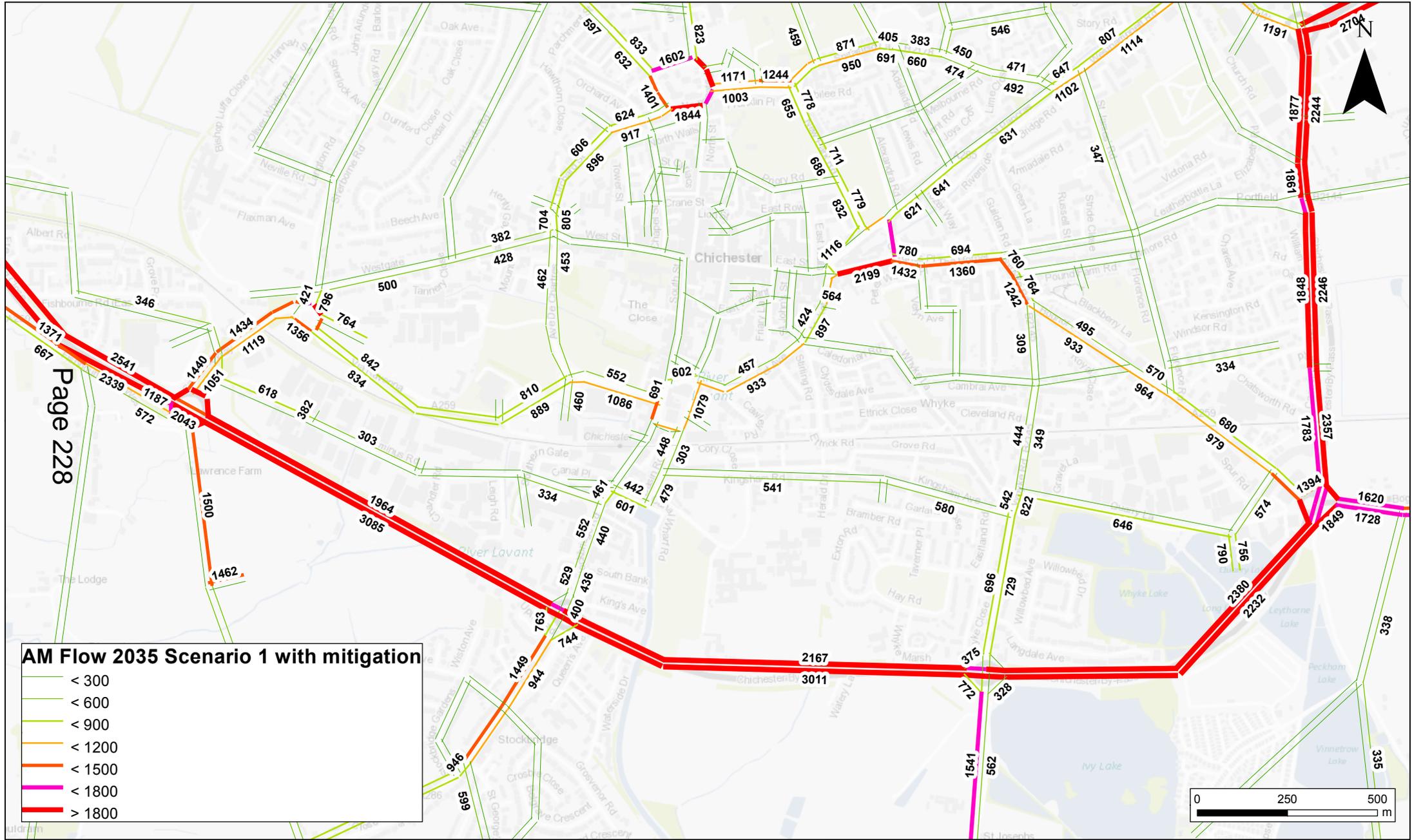
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Page 226





Page 228



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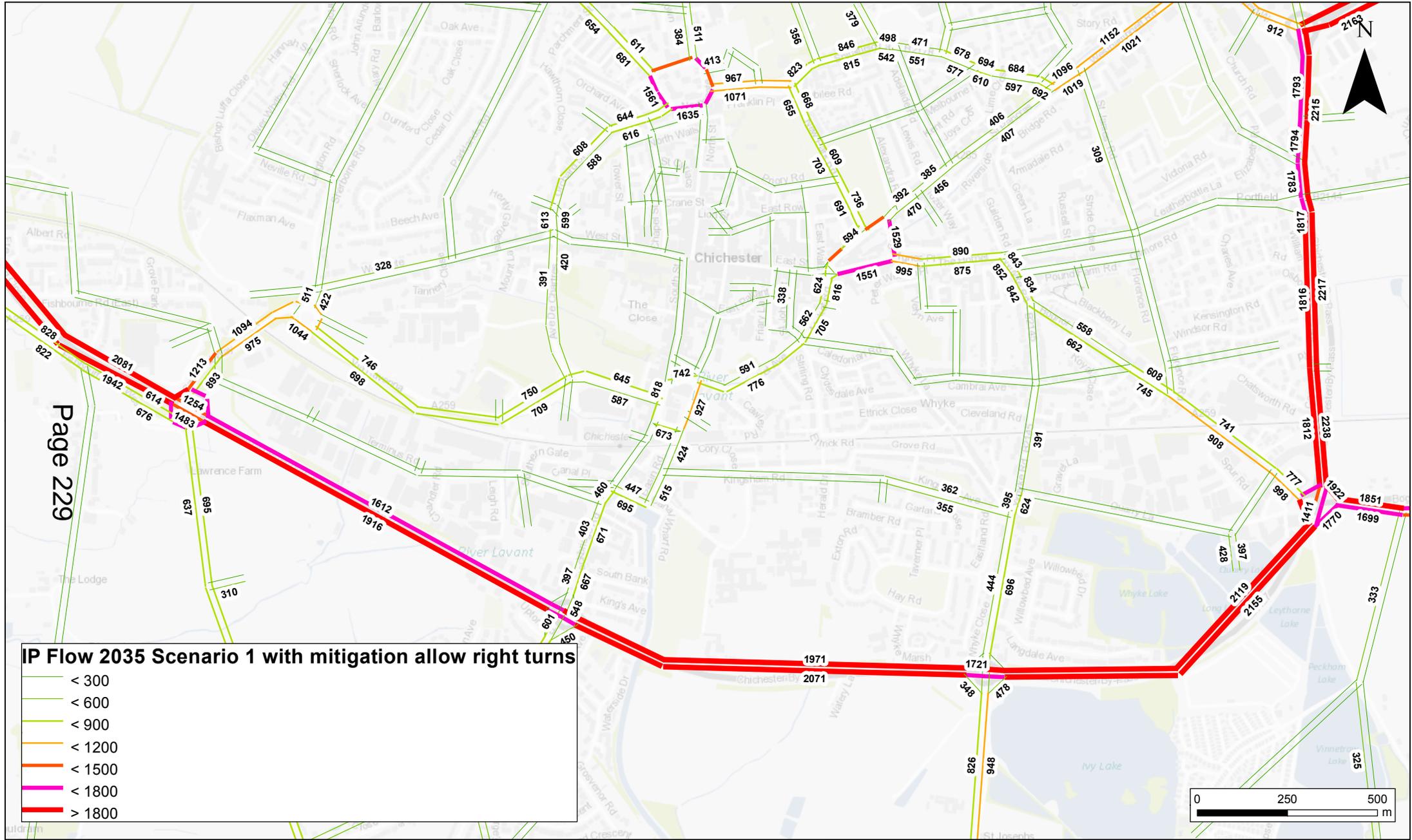
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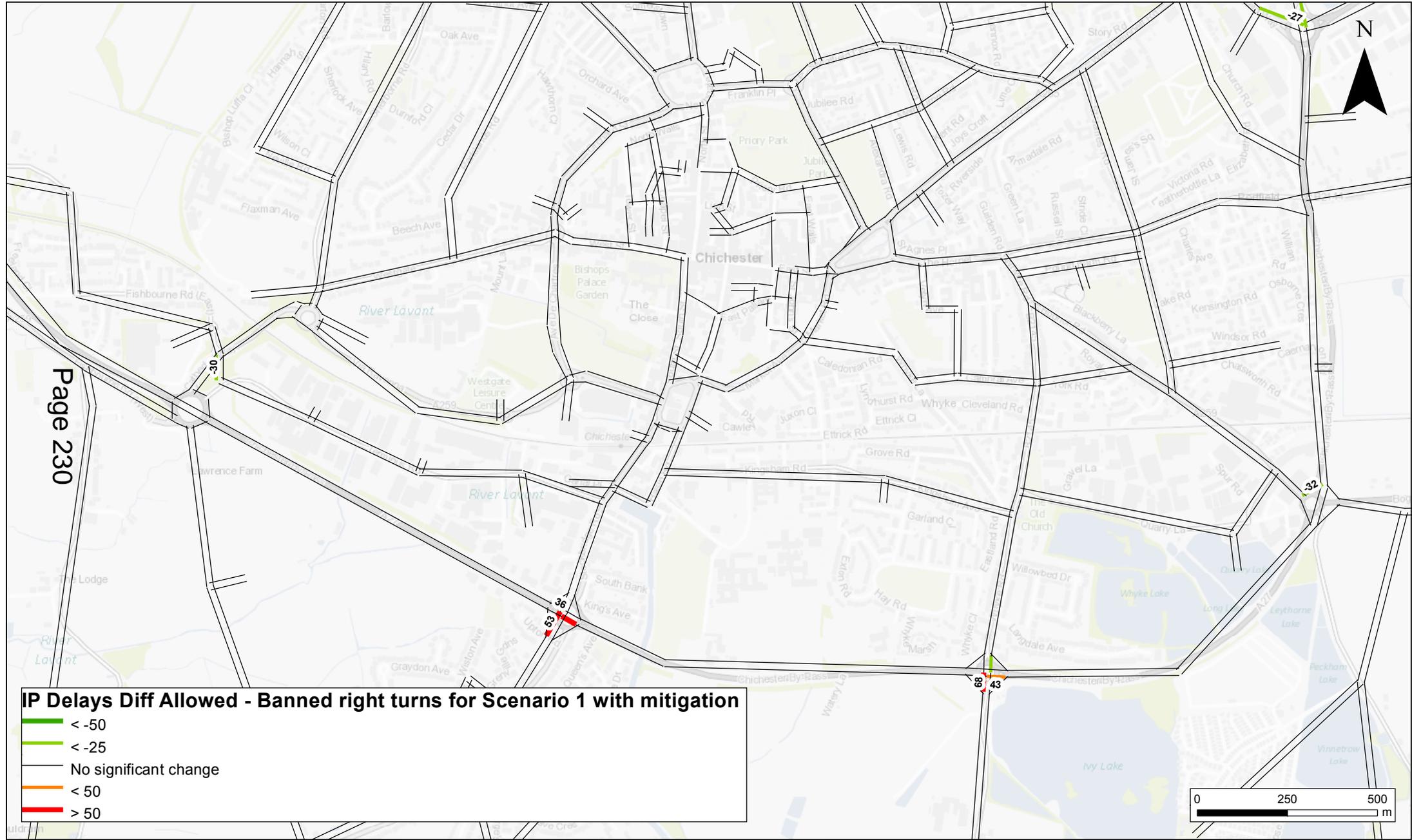
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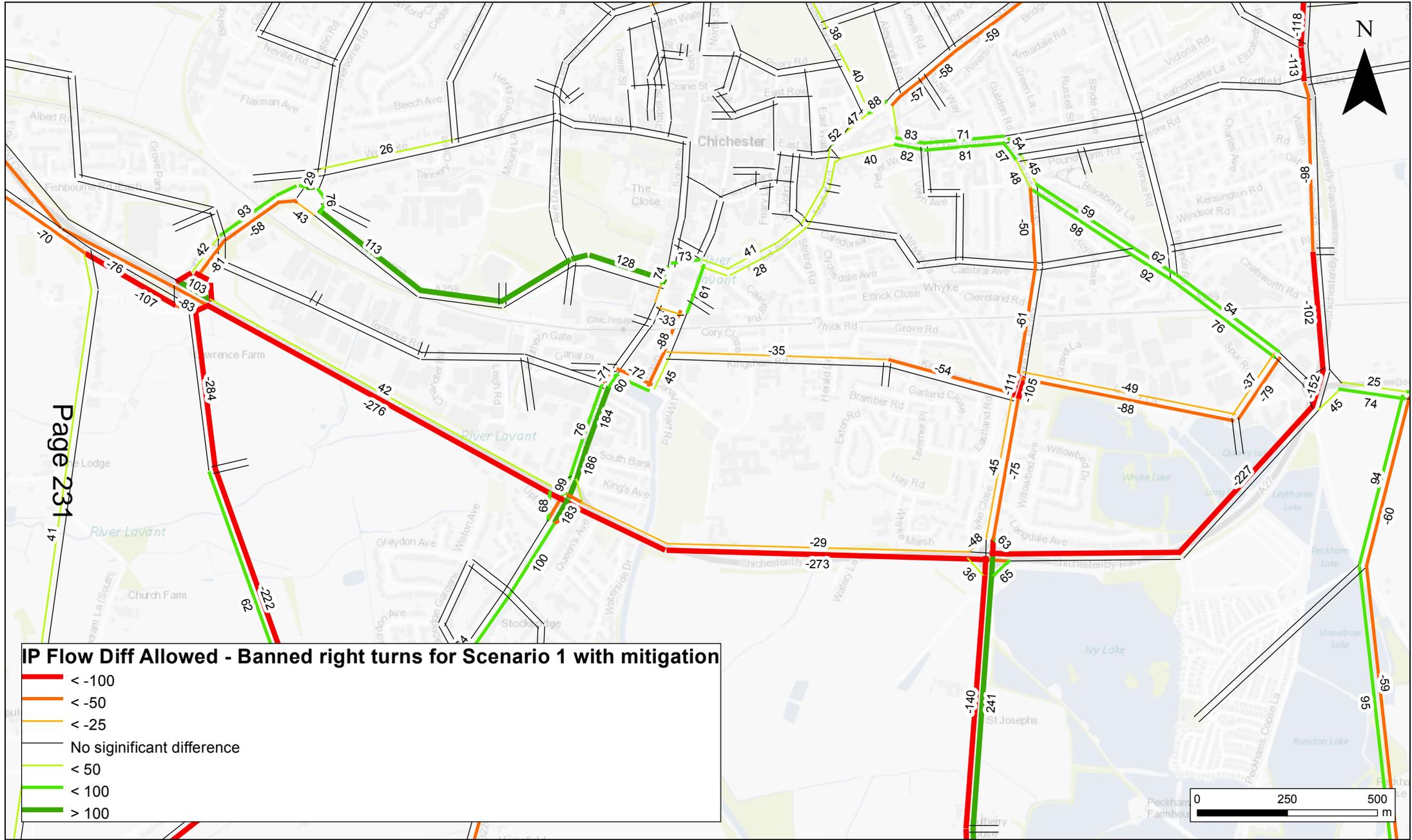
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Page 229



Page 230



Page 231



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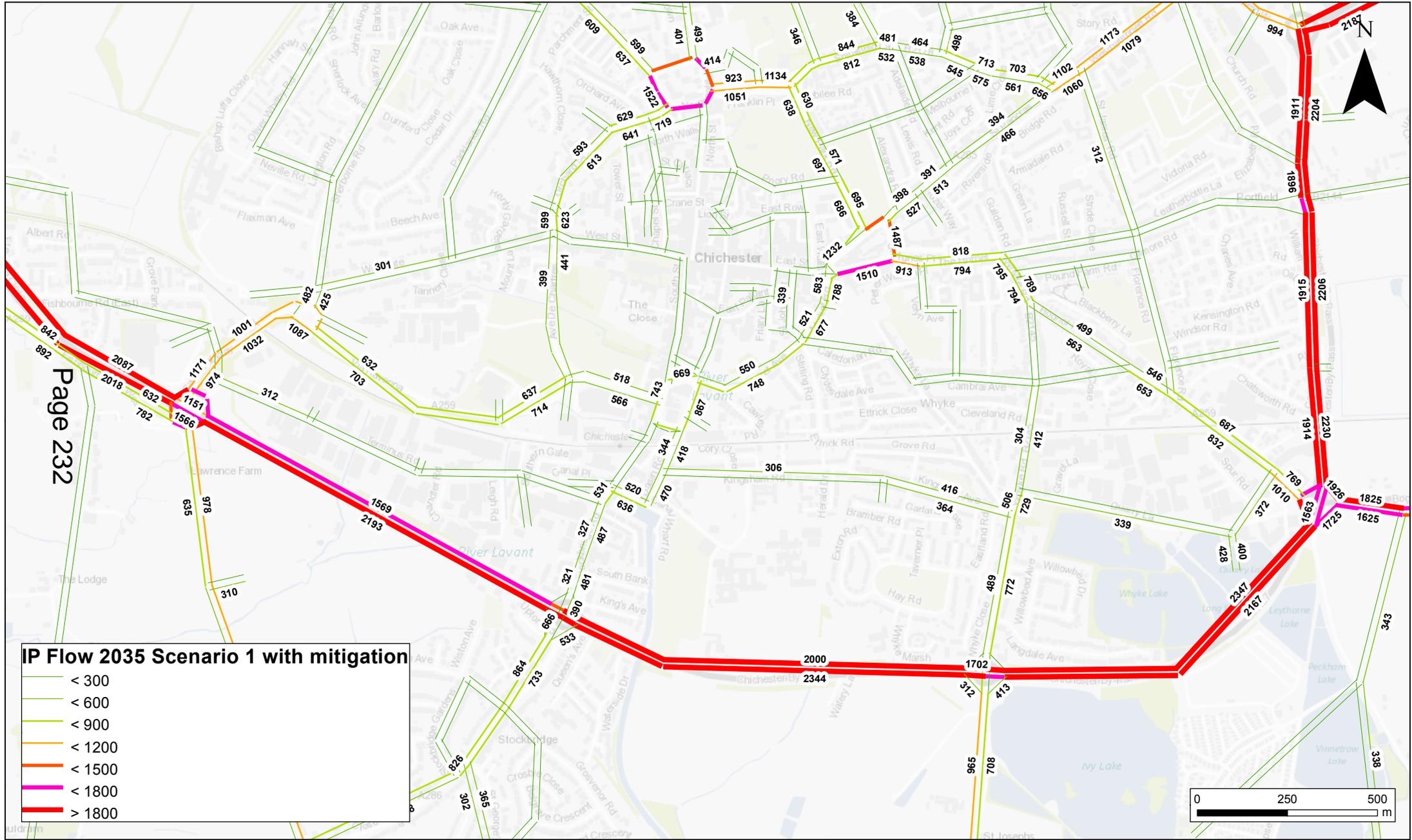
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Figure 01

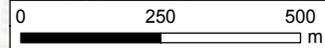
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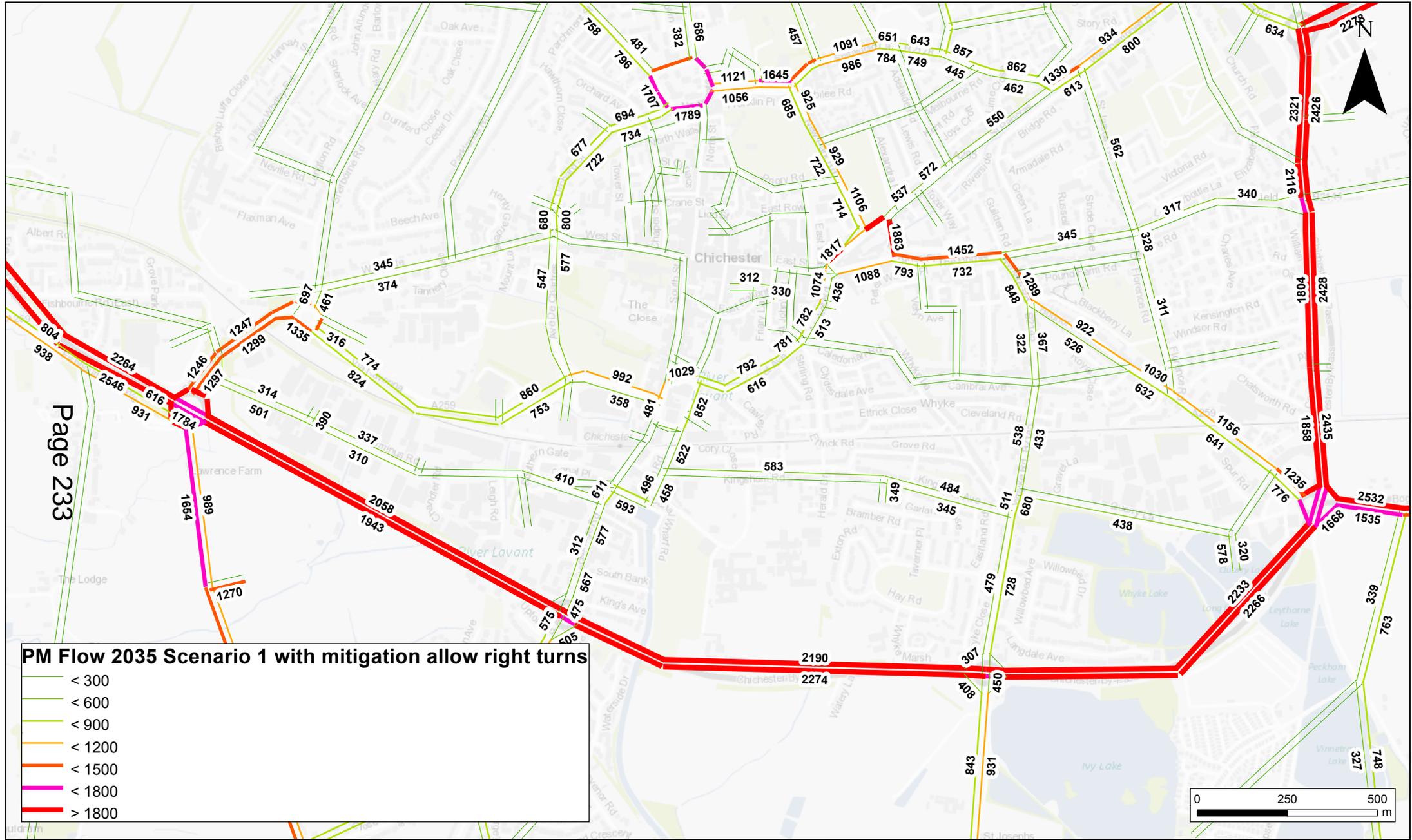


Page 232

**IP Flow 2035 Scenario 1 with mitigation**

- < 300
- < 600
- < 900
- < 1200
- < 1500
- < 1800
- > 1800





Page 233



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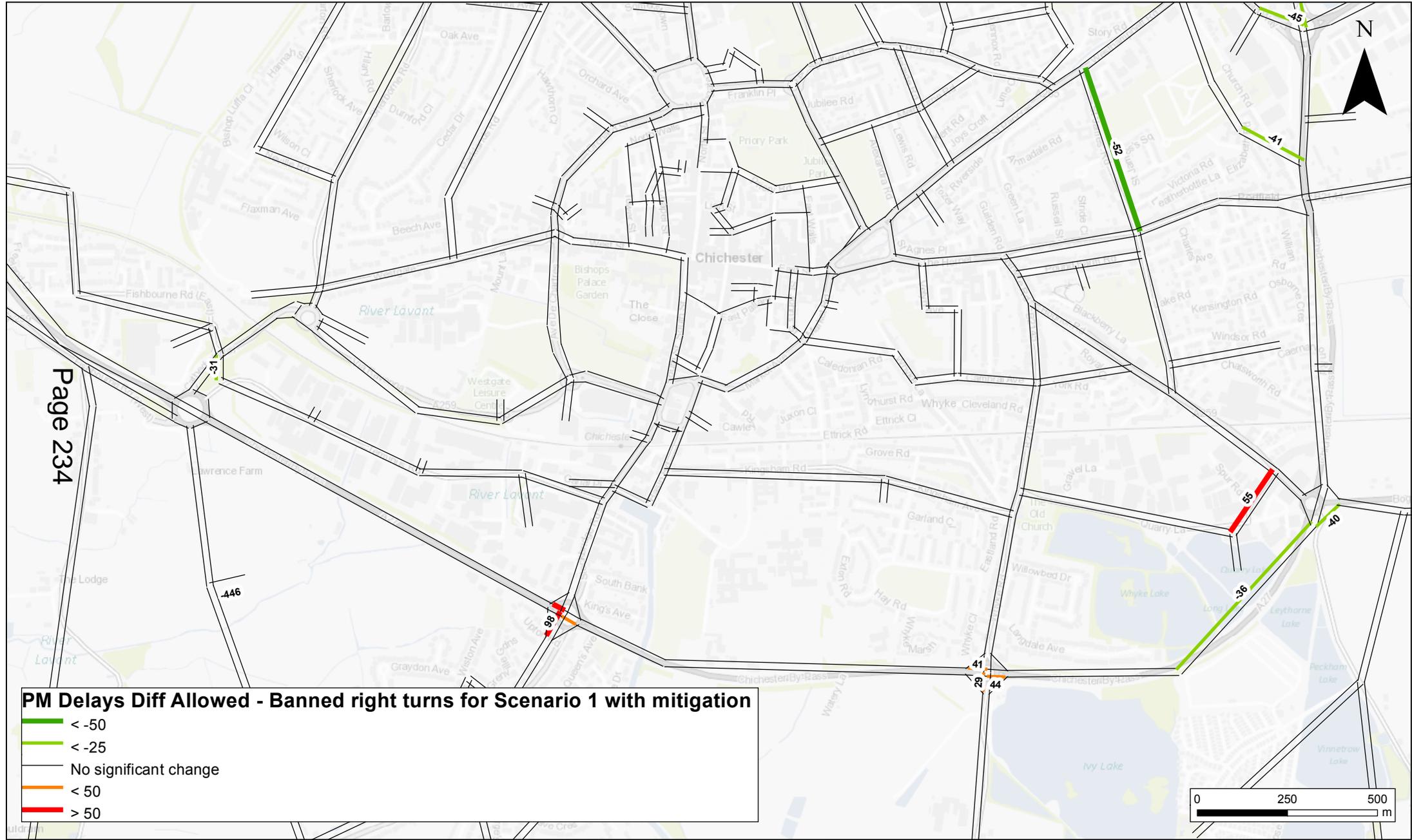
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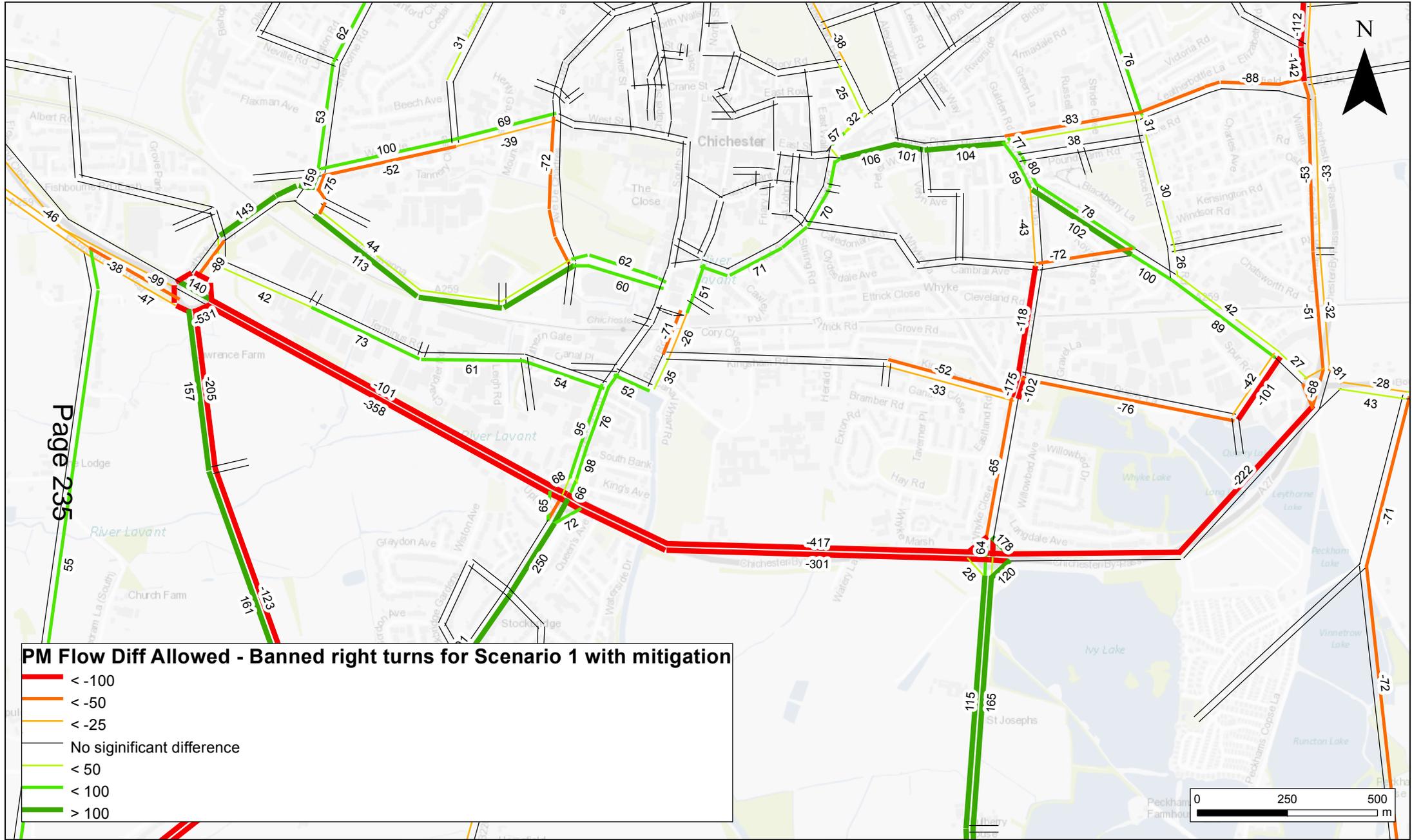
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Page 234



Page 235



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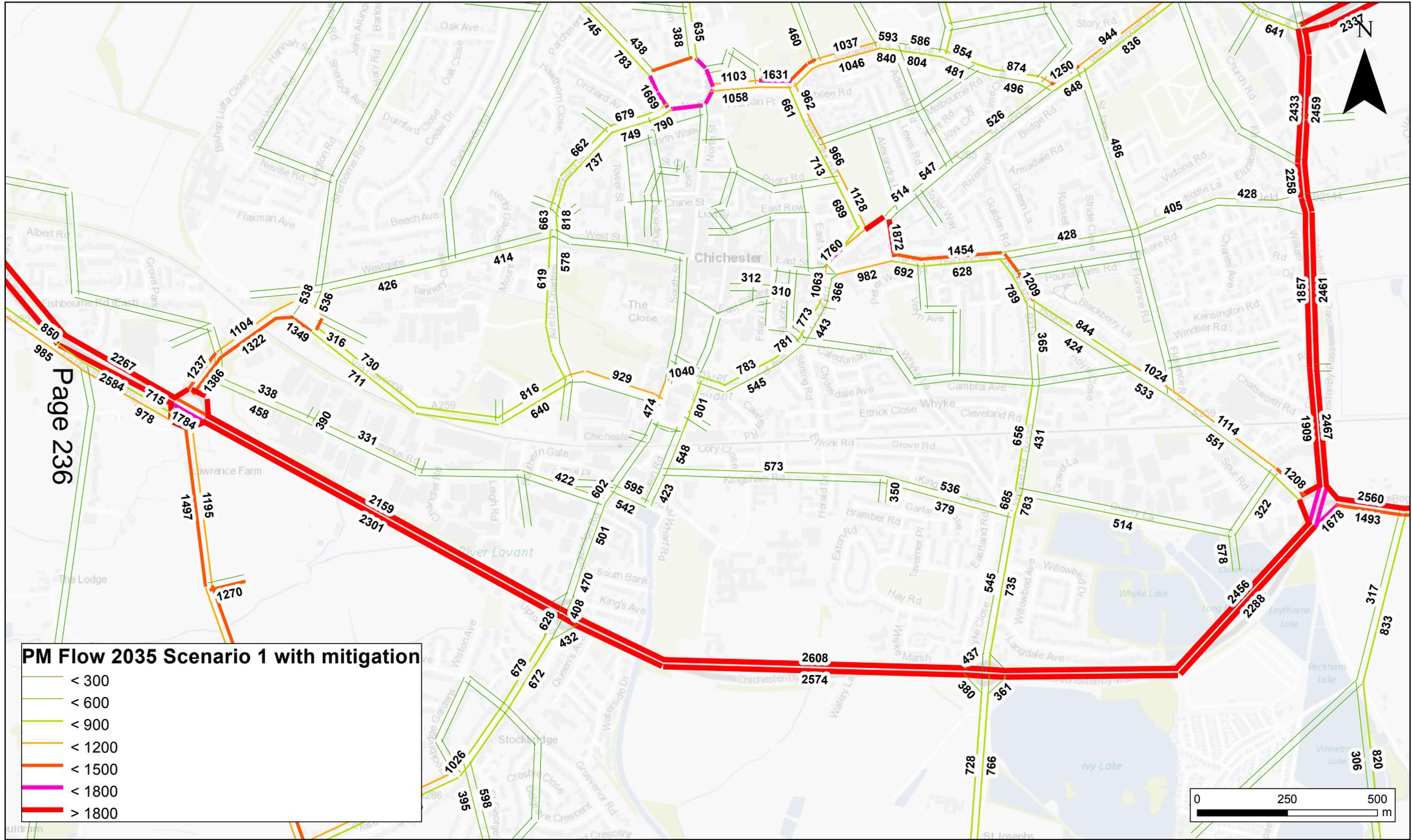
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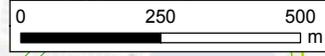
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Page 236

**PM Flow 2035 Scenario 1 with mitigation**

- < 300
- < 600
- < 900
- < 1200
- < 1500
- < 1800
- > 1800



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Figure 01	Rev A

Appendix 3

Part One – Distribution strategies subject to sustainability appraisal which informed the Local Plan Review Preferred Approach

<b>Parish</b>	<b>1 – focus on settlement hubs and E/W corridor</b>	<b>1A – strategy of preferred option LP</b>	<b>2 – focus on E/W corridor</b>	<b>3 – focus on Chichester city</b>	<b>4 – minimise development on the Manhood Peninsula</b>	<b>5 – dispersed distribution (NB– not to be progressed further)</b>
Southbourne	750	1,250	1,250	250	1,250	500
East Wittering	750	350	175	0	0	500
Selsey	750	250	175	0	0	500
East of Chichester	600	600	600	600	600	600
Hambrook area	600	500	750	500	700	500
Fishbourne	250	250	500	1,000	700	500
Bosham	250	250	500	500	700	500
Hunston	0	200	0	1,000	0	200
Birdham	0	0	0	100	0	150
Tangmere	0	300	0	0	0	0
Chichester (Southern Gateway)	350	350	350	350	350	350
Apuldram	100	100	100	100	100	100
Parish numbers	500	500	500	500	500	500
<b>Total</b>	<b>4,900</b>	<b>4,900</b>	<b>4,900</b>	<b>4,900</b>	<b>4,900</b>	<b>4,900</b>

Part Two – Additional development distributions tested through evidence base, including sustainability appraisal

<b>Parish</b>	<b>Scenario 1B: Revisions to Preferred Approach Plan(NEW)</b>	<b>Scenario 6: Northern Focus (NEW)</b>
Southbourne	1,250	100
East Wittering	350	100
Selsey	250	100
East of Chichester	1000	600
Hambrook area	500	100
Fishbourne	250	100
Bosham	250	100
Hunston	200	100
Tangmere	300	100
Southern Gateway	350	350
South West of Chichester	300	0
North of Plan Area	0	3,250
Parish numbers	625	625
<b>Total</b>	<b>5,625</b>	<b>5,625</b>

# Sustainability Appraisal for the Chichester Local Plan Review – Alternative Spatial Development Strategies for Testing Through Evidence Base

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October 2019

## Contents

1. Introduction .....	3
1.1 Purpose of the Sustainability Appraisal .....	3
1.2 Consultation.....	4
2. Sustainability Framework .....	4
2.1 The Assessment Framework.....	4
Table 1 - Sustainability Framework for the Chichester Local Plan.....	5
2.2 Methodology used in the Sustainability Assessment Process .....	7
3. Issues and Options Stage .....	8
4. Spatial Strategy and Housing Numbers .....	9
4.1 Housing Numbers Options Considered.....	9
4.2 Housing Numbers Assessment Matrices .....	11
Table 2 – Sustainability Appraisal of Options for Housing Numbers .....	11
4.3 Summary of Effects.....	14
4.3.1 Option 1: 650 dpa .....	14
4.3.2 Option 2: 800 dpa .....	14
4.3.3 Option 3: 1,000 dpa .....	14
4.3.4 Conclusion .....	15
4.4 Spatial Strategy Options Considered .....	15
Table 3: Updated spatial distribution strategies for testing through the evidence base (August 2019) 17	
4.5 Spatial Strategy Assessment Matrices .....	20
Table 4 – Sustainability Appraisal of the Options for Spatial Distribution of Residential Development (Options 1, 1A and 1B) .....	20
Table 4 continued – Options 2-6 .....	29
4.6 Summary of Effects.....	39
4.6.2 Option1 - Focus on the Settlement Hubs and the East / West corridor .....	39
4.6.4 Option 1A - Strategy of the Preferred Option Local Plan.....	39
4.6.5 Option 1B - Revisions to Preferred Approach Plan (New Option) .....	39
4.6.6 Option 2 - Focus on the East / West Corridor .....	39
4.6.7 Option 3 - Focus on the area around Chichester City .....	40
4.6.8 Option 4 - Minimise development on the Manhood Peninsula .....	40
4.6.9 Option 6 - Northern Focus (New Option) .....	40
4.7 Cumulative and synergistic effects .....	41
4.8 Strategic Site Allocation Policies .....	41
5. Policies with Major Revisions or New Policies.....	43
5.1 Assessment matrix.....	43
5.2 Summary of effects by policy.....	45
6. Policies with Minor Revisions .....	51
Table 5: Policies with minor revisions .....	51
7. Monitoring framework .....	53
8. Conclusions.....	53
Appendix: Strategic Development Location Assessments updated (October 2019) from the Initial Sustainability Appraisal (May 2017) .....	55

## 1. Introduction

### 1.1 Purpose of the Sustainability Appraisal

- 1.1.1 The Chichester Local Plan: Key Policies 2014-2029 document was adopted by the Council on 14 July 2015, subject to an early review being completed by 2020. That review is now underway and the first stage was to prepare a consultation on the Issues and Options facing the plan area, which consists of the District outside of the South Downs National Park. This consultation took place from 22 June 2017 until Thursday 3 August 2017.
- 1.1.2 That stage was intended to draw out comments and information to help the Council develop a draft strategy and policies to be included in the Local Plan Review. The consultation asked many open-ended questions on issues, vision and objectives. It also included a long list of potential housing locations, both strategic and the smaller or non-strategic locations. The Sustainability Appraisal at that stage concentrated on identifying the sustainability effects; positive, negative and neutral, of housing in those broad locations.
- 1.1.3 The main purpose of Sustainability Appraisal (SA) is to assess the social, environmental and economic effects for the emerging options in the Local Plan Review so that decisions that will be made, accord with the objectives of sustainable development. These options may not fully achieve a positive impact on all the sustainability objectives at the same time, but the aim of the process is to inform decision makers and consultees of the pros and cons of the options before them and so ensure that the Local Plan Review contributes towards all of the sustainability objectives as far as is possible.
- 1.1.4 As the plan making process has advanced the options have become narrower in range and more clearly defined. The heart of the Local Plan Review is the identification of the housing requirement to plan for and the spatial distribution options to deliver this requirement. These are the decisions that have the most significant impact on the economy, society and environment, and they are assessed in greater depth. There are also a number of new policies being introduced in the Local Plan Review and others that are substantially revised. These are also assessed, but against a simplified assessment method. As this is a review of the adopted Local Plan not all areas are subject to significant change. Where policies are changed, but without a substantial change in policy outcomes, they are noted but not re-assessed, because these policies were assessed in full as part of the SA of the adopted Local Plan.

### 1.2 Consultation

- 1.2.1 An SA report accompanied the Chichester Local Plan Review – Preferred Approach consultation which ran from 13th December 2018 to 7th February 2019. That SA report was also subject to consultation alongside the Local Plan Review – Preferred Approach. This version of the SA report had been updated in the light of those consultation responses. It

also examines two new options for the spatial distribution of development introduced after the preferred approach consultation. Where policies have been substantially altered from the preferred approach, this SA report has been updated to reflect this.1.2.2 Please note that the SA is used to inform the decision making in the Local Plan Review process and does not make the decisions, so where minor changes to the assessment have been suggested and adopted through the consultation process, this will not necessarily alter the preferred approach.

## **2. Sustainability Framework**

### **2.1 The Assessment Framework**

2.1.1 The Sustainability Framework is at the heart of the Sustainability Appraisal and is the tool with which planning policies or options being proposed within the Local Plan Review are assessed based on their impact on a number of sustainability criteria.

2.1.2 The SA scoping report published in December 2016 (<http://www.chichester.gov.uk/CHttpHandler.ashx?id=30857>) sets out how the SA Framework has been arrived at, including the plans and programmes examined, the baseline data and the sustainability issues identified as being relevant to the Plan Area and to the plan-making process. From these, 13 SA objectives were drawn up. For each of these, between one and four assessment criteria were derived to allow for more detailed examination of the impacts of options. Finally, for each of the 13 SA objectives, monitoring indicators were identified to help inform the assessment of the policies against the Sustainability Appraisal objectives.

2.1.3 The full SA framework is set out in Table 1:

**Table 1 - Sustainability Framework for the Chichester Local Plan**

SA Objective	Assessment Criteria	Indicators (numbers refer to the indicator numbers set out in Scoping Report and may refer to more than one assessment criteria)
1. Protect and enhance wildlife	<p>1A) Does the option prevent biodiversity loss and habitat fragmentation?</p> <p>1B) Does the option allow for movement of habitats with climate change?</p> <p>1C) Does the option enhance biodiversity opportunities and create new habitat?</p>	<p>18 Percentage of SSSI land in favourable condition</p> <p>Authorities Monitoring Report (AMR) Indicator A2 Changes in areas of biodiversity importance</p>
2. Maximise efficient use of natural resources	<p>2A) Does the option protect water resources?</p> <p>2B) Does the option maximise use of waste resources?</p> <p>2C) Does the option make efficient use of energy?</p>	<p>15 Daily domestic water use</p> <p>19 Waste collected per household</p> <p>13 Domestic CO<sub>2</sub> emissions per household</p>
3. Reduce pollution and improve air quality	<p>3A) Does the option reduce air pollution from industrial processes and transport?</p> <p>3B) Will the option assist the remediation of contaminated land?</p> <p>3C) Does the option reduce levels of water pollution?</p> <p>3D) Does the option require new Waste Water Treatment capacity?</p>	<p>16 Percentage of water bodies assessed as good ecological status</p> <p>17 Percentage of water bodies assessed as good chemical status (Environment Agency)</p> <p>30 Annual average NO<sub>2</sub> data from selected sites in the District (CDC data)</p>
4. Achieve zero net increase in greenhouse gas emissions	<p>4A) Does the option maximise the use of renewable and low carbon energy sources?</p> <p>4B) Does the option reduce the need to travel?</p>	<p>14 Reduction in CO<sub>2</sub> emissions per capita.</p> <p>22 Percentage of residents who travel to work on foot or cycle</p>

SA Objective	Assessment Criteria	Indicators (numbers refer to the indicator numbers set out in Scoping Report and may refer to more than one assessment criteria)
5. Minimise flood risk for new and existing development	5A) Does the option reduce the risks of coastal, fluvial surface water and groundwater flooding?  5B) Does the option increase the use of SUDS and provide opportunities for restoring natural function to rivers and coastal systems?	AMR Indicator E1 Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds  Number of houses at risk of flooding (from the Environment Agency and Strategic Flood Risk Assessment)
6. Achieve a sustainable and integrated transport system	6A) Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?  6B) Does the option improve networks for cyclists and pedestrians?  6C) Does the option reduce congestion?	2a – g Percentage of rural households within 2km/4km of facilities  21a Estimated traffic flow for all vehicle types  21b Average number of vehicles entering Chichester City Centre between 7 and 10am  22 Percentage of residents who travel to work on foot or cycle
7. Conserve and enhance landscape and built heritage	7A) Does the option encourage sustainable land management practices to conserve landscapes?  7B) Does the option ensure protection of traditional urban forms?  7C) Does the option ensure protection of listed buildings, conservation areas and archaeological sites?	Number of Listed Building Consents where historic building advice not implemented in full.
8. Increase availability of affordable housing	8A) Does the option meet local housing needs?  8B) Does the option provide the right housing mix of size and tenure and the continuation of a sustainable mix of people within communities?	9 Total number of net new housing completions  10 Affordable dwellings completed as a percentage of all new housing completions (gross)  12 Median house price to income ratio.
9. Provide access to services and facilities	9) Does the option provide access to services and facilities?	2 Percentage of rural households within 2km/4km of facilities.

SA Objective	Assessment Criteria	Indicators (numbers refer to the indicator numbers set out in Scoping Report and may refer to more than one assessment criteria)
10. Promote economic development to maintain quality of life and competitiveness	10A) Does the option ensure that economic opportunities are accessible to all? 10B) Does the option ensure that value added is retained in the District?	5a – e Amount of floor space developed for employment by type. 1a-h Percentage of employees in different sectors. 8 Percentage of children that live in families that are income deprived.
11. Develop a dynamic, diverse and knowledge based economy that excels in innovation	11A) Does the option encourage innovation? 11B) Does the option develop knowledge based economy locally?	1f Percentage of employees in information and communications 27 Percentage of young people who are unemployed
12 To develop and maintain a skilled workforce to support long-term competitiveness	12A) Does the option ensure skills are enhanced to increase access to work? 12B) Does the option ensure a skilled workforce is available locally to allow business development?	28 Percentage of 15 year olds achieving five or more GCSEs at grade A*- C or equivalent (in local authority schools) 3 Percentage of establishments reporting skills shortage vacancies
13. Enable viability of the rural economy with enhanced diversity of employment opportunities	13A) Does the option promote a prosperous and diverse rural economy? 13B) Does the option avoid the loss of the Best and Most Versatile agricultural land?	4 Median Gross Weekly earnings 7 Percentage change in the number of VAT registered Businesses

## 2.2 Methodology used in the Sustainability Assessment Process

2.2.1 The SA framework forms the basis of the qualitative assessments made within this SA report. For the key decisions on housing numbers, and the spatial strategy for distributing strategic development, a full assessment matrix has been used. For each of the 31 assessment criteria (as identified in Table 1 above) the impact is assessed as being one of the following:

Assessment symbol	Explanation
++	Significant positive effects
+	Positive effects, benefits clearly outweigh any disadvantages.
0	Overall neutral, effects both positive and negative roughly balancing each other
-	Negative effect, disadvantages clearly outweighing benefits
--	Significant negative effects
N/a	<b>Either</b> no interaction between the policy option and assessment criteria, <b>or</b> the effect is not location specific

- 2.2.2 For each assessment the comment box next to it is used to explain the reasoning behind the assessment and to add notes on any uncertainties. This also provides the opportunity to note whether the effects are considered likely to be short, medium or long term and whether they are temporary or permanent. A narrative summary of the potential effects for each option is included after the assessment matrix.
- 2.2.3 For other policy options which are new or subject to major revisions in the review a simplified assessment method has been used, reflecting the provisions of the Planning Practice Guidance. The 13 SA objectives have been used with the same set of assessment symbols defined above. The individual assessment comments have been omitted and a summary of both the reasoning and major effects are set out in an accompanying narrative.
- 2.2.4 A number of the policies in the Local Plan Review are simply updates or minor revisions of policies introduced in the adopted Chichester Local Plan: Key Policies 2014-2029. These policies were subject to a full SA during the plan preparation process. Please see <http://www.chichester.gov.uk/CHttpHandler.ashx?id=21807&p=0> for more information. Each policy in the Review has been examined to see if any wording changes have introduced a new policy outcome, or whether they are updates or revisions that maintain the same policy aim and outcomes. In the latter case the policy is not assessed again in this report as the results would be very close or identical with the Submission SA from May 2014. A full list of such policies and more details are to be found in Section 6 below.

### 3. Issues and Options Stage

- 3.1 The SA report for the Issues and Options stage of the review can be found here: <http://www.chichester.gov.uk/CHttpHandler.ashx?id=28356&p=0>
- 3.2 10 potential strategic development (meaning 500+ dwellings) locations were previously assessed using all the assessment criteria (the full assessment matrix). A visual (bar-chart) summary of findings was presented and is set out on pages 9 to 11 of the document.
- 3.3 The 10 options were:
- S1 East of Chichester / south of Shopwyke area

- S2 South East of Chichester (south of A259)
- S3 East Wittering / Bracklesham
- S4 Selsey
- S5 Southbourne
- S6 Tangmere
- S7 Broadbridge (now referred to as Bosham)
- S8 West of Fishbourne
- S9 Hambrook / Nutbourne
- S10 Oving / Drayton

- 3.4 Each location was assessed independently and without any particular quantity of development allocated to it. In addition 33 non-strategic locations (meaning between 100 and 500 dwellings) were also assessed using the full matrix.
- 3.5 The findings of the assessment carried out for the Issues and Options consultation, have been considered in preparing the Sustainability Appraisal within this report.

## 4. Spatial Strategy and Housing Numbers

- 4.0.1 For policies S3 (Development Strategy) and Policy S4 (Meeting Housing Needs) of the Local Plan Review, various options for housing numbers and for the location of those homes were considered in the early stages of plan preparation and assessed through the SA process. As these two policies determine much of what follows in the Plan Review and between them have the most significant impact on environmental, social and economic factors these options have been assessed in greater depth. The options set out below have underpinned the identification of a recommended Preferred Option within the Local Plan Review.

### 4.1 Housing Numbers Options Considered

- 4.1.1 For housing numbers, three different levels of development were identified for further consideration over and above the identified committed supply of housing of approximately 7,500 dwellings. This committed supply includes housing already completed, that provided for through existing development plans (including windfalls) and other planning permissions. For each option considered over and above this 'baseline', indicative numbers were allocated to strategic development locations in order to explore what the implications of such numbers might be. The locations were based on those assessed at the Issues and Options stage, with two exceptions. Firstly strategic development location 'S10 Oving Drayton' was previously appraised as being likely to have mainly negative sustainability impacts and was dropped in favour of the larger settlement of Hunston. Secondly although 'south of Shopwyke (S1)' was retained as a distinct site, now known as 'East of Chichester', Chichester City as a whole became a location with the focus on the emerging opportunity for redevelopment of the 'Southern Gateway' area. Subsequently to these initial stage options Southern Gateway became a specific allocation within the plan.

- Delivery at 650 dwellings per annum (dpa) (Objectively Assessed Need plus unmet need from the Chichester District part of the South Downs National Park)

<b>Strategic sites:</b>	<b>Indicative number of dwellings</b>
Southern Gateway	350
Tangmere	300
Southbourne	1,250
East Wittering	350
East of Chichester	600
Selsey	250
Hambrook	500
Fishbourne	250
Bosham	250
Hunston	200
Parish housing requirements	500

- Delivery at 800 dpa

<b>Strategic sites:</b>	<b>Indicative number of dwellings</b>
Southern Gateway	350
Tangmere	300
Southbourne	1,250
East Wittering	736
East of Chichester	1,261
Selsey	526
Hambrook	1,051
Fishbourne	526
Bosham	526
Hunston	526
Parish housing requirements	550

- Delivery at 1000 dpa

<b>Strategic sites:</b>	<b>Indicative number of dwellings</b>
Southern Gateway	350
Tangmere	300
Southbourne	1,250
East Wittering	1,250
East of Chichester	1,250
Selsey	1,179
Hambrook	1,250
Fishbourne	1,179
Bosham	1,179
Hunston	1,179
Parish housing requirements	550

4.1.2 Locations were generally limited to a maximum of 1,250 dwellings to ensure such sites were deliverable during the plan period. Redistribution of numbers in excess of this was done by dividing equally between other locations, which in some cases leads to an unusually precise number.

## 4.2 Housing Numbers Assessment Matrices

**Table 2 – Sustainability Appraisal of Options for Housing Numbers**

Assessment Criteria		Option 1. 650 dwellings per annum	Option 2. 800 dwellings per annum	Option 3. 1,000 dwellings per annum			
1A	1A Does the option prevent biodiversity loss and habitat fragmentation?	-	The overall scale of development is expected to have an adverse impact. Policies on master planning, GI and wildlife corridors will mitigate but not eliminate this impact	--	The greater scale of development will increase the risk that more sensitive sites of higher value will have to be allocated	--	The greater scale of development will increase the risk that more sensitive sites or higher value will have to be allocated
1B	1B Does the option allow for movement of habitats with climate change?	0	Overall a neutral impact is likely, assuming that the option allows for strategic wildlife corridors to be maintained	-	Greater risk of land take impacting on wildlife corridors	--	Increased risk of sites being allocated within or adjacent to wildlife corridors
1C	1C Does the option enhance and/or restore biodiversity opportunities and create new habitat?	+	Opportunities for enhancement within strategic sites	+	Opportunities for enhancement within strategic sites	-	The greater numbers at several locations may lead to sites being developed at greater density and space for habitat creation being squeezed out
2A	2A Does the option protect water resources?	0	Overall a neutral impact is likely- the increase in overall demand could be mitigated by other policies on sustainable construction	-	Increase in overall level of development is likely to put more demand on water resources	-	Increase in overall level of development is likely to put more demand on water resources
2B	2B Does the option maximise use of waste resources?	N/a	Not site specific	N/a	Not site specific	N/a	No site specific
2C	2C Does the option make efficient use of energy?	+	Use of large scale strategic sites for most of the additional development is likely to allow for higher standards of efficiency	+	Use of large scale strategic sites for most of the additional development is likely to allow for higher standards of efficiency	++	Use of large scale strategic sites for most of the additional development is likely to allow for higher standards of efficiency
3A	3A Does the option reduce air pollution from industrial processes and transport?	-	On transport a package of mitigation measures, as identified in the transport study is likely to be needed to reduce the impact of additional traffic, but no additional exceedances of AQ objectives are expected	-	On transport a package of mitigation measures set out in the transport study is likely to be needed to reduce the impact of additional traffic, but no additional exceedances of AQ objectives are expected	--	The increased numbers and additional traffic movements is likely to further increase pollution, even if it remains as predicted within AQ objectives
3B	3B Will the option assist the remediation of contaminated land?	+	Increased scale of development is likely to result in the remediation of some sites, but the majority of new strategic development is expected to be greenfield and the exact effect is uncertain due to being site specific	+	Increased scale of development is likely to result in the remediation of some sites, but the majority of new strategic development is expected to be greenfield and the exact effect is uncertain due to being site specific	++	Increased scale of development is more likely than other options to result in the remediation of some sites, but the majority of new strategic development is expected to be greenfield and the exact effect is uncertain due to being site specific
3C	3C Does the option reduce levels of water pollution?	0	A neutral impact is expected. Development is unlikely to reduce levels of water pollution, but provided that highway and hard-standing runoff is properly dealt with and mitigated then an increase is unlikely	0	A neutral impact is expected. Development is unlikely to reduce levels of water pollution, but provided that highway and hard-standing runoff is properly dealt with and mitigated then an increase is unlikely	-	Compared to the other options there is an increased likelihood of sites having to be being allocated in groundwater sensitive or protected zones
3D	3D Does the option require new waste water treatment capacity?	-	Will require new waste water treatment capacity and potentially technological treatment upgrades due to nitrogen constraints at the Harbour	--	Will require new waste water treatment capacity and technological treatment upgrades due to nitrogen constraints at the Harbour	--	Will require new waste water treatment capacity and technological treatment upgrades due to the nitrogen constraints at the Harbour

Assessment Criteria		Option 1. 650 dwellings per annum	Option 2. 800 dwellings per annum	Option 3. 1,000 dwellings per annum	
4A	4A Does the option maximise the use of renewable and low carbon energy sources?	+	Large strategic sites have the potential for CHP, district heating and also the space for a wide range of renewable energy technologies	++	Large strategic sites have the potential for CHP, district heating and also the space for a wide range of renewable energy technologies
4B	4B Does the option reduce the need to travel?	-	Insufficient brownfield sites within existing settlements to meet identified needs. The strategic sites identified are generally greenfield, located on the edge of settlements with a range of facilities and services. This is likely to result in an increased need to travel	--	At this level of development site availability becomes constrained and more housing will be in locations with greater need to travel
5A	5A Does the option reduce the risks of coastal, fluvial surface water and groundwater flooding?	-	Negative impact is likely due to increased runoff. Could be mitigated down to neutral (no significant effect) by full use of Sustainable Drainage Systems (SuDS) but this may not be possible for all sites	--	Greater area of impermeable surface increases risk of surface water flooding impacts. This option relies on more development in the Manhood Peninsula, where water management options are limited by high water table
5B	5B Does the option increase the use of SuDS and provide opportunities for restoring natural function to rivers and coastal systems?	+	Allows for enough choice between locations to account for sites suitable for SuDS	0	Same issues as for Option 3 but to a lesser degree
6A	6A Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?	+	Positive impact likely, on the basis that as much development as possible is near to Chichester City and / or train stations	0	Forces use of less sustainable locations counterbalancing the use of better locations
6B	6B Does the option improve networks for cyclists and pedestrians?	+	Overall a positive impact is likely, but requires mitigation and improved links for Southbourne, particularly links over the train line	0	Impacts likely to be between Options 1 and 3
6C	6C Does the option reduce congestion?	-	Analysis of journey times and delays as part of the Transport Study shows that without mitigation measures on junction on the A27 then congestion, is likely to increase significantly by 2035	--	For this option east west peak time traffic flows and journey times increase slightly compared to other options, even with mitigation measures. However other routes particularly some on and off the Manhood Peninsula see significant projected increases in journey times.
7A	7A Does the option encourage sustainable land management practices to conserve landscapes?	0	Overall neutral – allows for selection of least damaging sites	-	Increased local impacts on landscape across the Bournes and at East Wittering but still avoids the most sensitive areas
7B	7B Does the option ensure protection of traditional urban forms?	0	Overall a neutral impact is likely- allows for selection of least damaging sites	-	Would be likely to transform the nature of several settlements, with Hunston probably the most significantly affected
7C	7C Does the option ensure conservation and enhancement of the historic environment, heritage assets and their settings?	0	The impact is largely site specific. This option is assessed as likely to be a neutral but uncertain effect on the basis of being able to re-allocate development away from sites that could have a negative impact	-	The maximisation of development at all locations gives a significant risk of negative impacts (but still an uncertain and site specific effect)

Assessment Criteria		Option 1. 650 dwellings per annum	Option 2. 800 dwellings per annum	Option 3. 1,000 dwellings per annum			
8A	<b>8A Does the option meet local housing needs?</b>	+	This option's major aim is to meet objectively assessed housing needs (OAN) for the plan area	++	Delivery above OAN will meet the local housing need and also part of a wider housing need	++	Delivery at this level will meet local needs and those from further afield
8B	<b>8B Does the option provide the right housing mix of size and tenure and the continuation of a sustainable mix of people within communities?</b>	+	Several large strategic sites are likely to provide a sustainable mix, providing other policies are in place to ensure this	++	Increased housing numbers should bring additional affordable housing	++	Increased housing numbers should bring additional affordable housing
9	<b>9 Does the option provide access to services and facilities?</b>	+	Generally the housing locations implied in this options should provide a reasonable access to services and facilities. Some additional facilities and infrastructure are likely to be needed for the very largest sites (e.g. Southbourne) to ensure that this impact remains positive	++	Increased scale of delivery should bring opportunities to secure new facilities within the locations with strategic development	++	Increased scale of delivery should bring opportunities to secure new facilities within the locations with strategic development
10A	<b>10A Does the option ensure that economic opportunities are accessible to all?</b>	++	Allows for a choice of locations to deliver housing in the places with best access to jobs	++	Delivers in locations with best access to jobs and also in locations will less access, but it will not reduce access compared to Option 1	++	Delivers in locations with best access to jobs and also in locations will less access, but it will not reduce access compared to Option 1
10B	<b>10B Does the option ensure that value added is retained in the District?</b>	+	By meeting OAN, this should reduce commuting in for work compared to present Local Plan	++	Over delivery compared to the OAN could create opportunities for economic development, including attracting a range of businesses to the District	++	Over delivery compared to the OAN could create opportunities for economic development, including attracting a range of businesses to the District
11A	<b>11A Does the option encourage innovation?</b>	+	Positive impact as housing meets present economic needs	++	Over delivery of housing could result in additional businesses moving into the District, including start-up companies	++	Over delivery of housing could result in additional businesses moving into the District, including start-up companies
11B	<b>11B Does the option develop knowledge based economy locally?</b>	+	Housing development on its own can't achieve this but meeting the OAN will support economic development potentially increasing the provision of better paid and higher skilled work	++	Housing development on its own can't achieve this but exceeding the OAN will support economic development potentially increasing the provision of better paid and higher skilled work	++	Housing development on its own can't achieve this but exceeding the OAN will support economic development potentially increasing the provision of better paid and higher skilled work
12A	<b>12A Does the option ensure skills are enhanced to increase access to work?</b>	N/a	No significant effect	N/a	No significant effect	N/a	No significant effect
12B	<b>12B Does the option ensure a skilled workforce is available locally to allow business development?</b>	+	Positive impact as increases housing supply over current Local Plan provision	++	Further increase in supply makes generous provision for skilled and unskilled employees as well as retired and other households	++	Further increase in supply makes generous provision for skilled and unskilled employees as well as retired and other households
13A	<b>13A Does the option promote a prosperous and diverse rural economy?</b>	+	Meeting OAN helps meets rural needs as well, but may require some travelling out of the main settlements to rural employment	0	Overall neutral a mixture of the impacts from Options 1 and 3	-	The required land take may be sufficient to reduce the land used for certain agricultural businesses to a point which threatens their long term prospects.
13B	<b>13B Does the option avoid the loss of the Best and Most Versatile agricultural land?</b>	-	The majority of the remaining locational options after the adopted local plan are on Grade 1 or Grade 2 land	--	Same issue as for Option 1 but with greater land take	--	Same issue as for Option 2 but with even greater land take

## 4.3 Summary of Effects

### 4.3.1 Option 1: 650 dpa

The primary benefits of this option are economic – by meeting the objectively assessed need (plus the unmet need from the SDNPA in Chichester District) this option should deliver housing to support economic growth, to mitigate the dip in population (1% loss over 5 years, Office of National Statistics) in the plan area amongst the working age population and to deliver a proportion of affordable housing in comparison to the existing adopted local plan. Although the land required over and above the adopted Local Plan is considerable, there are sufficient potential sites to allow for some choice of spatial distribution (see section 4.4 below). This in turn should allow some ability to mitigate, but not eliminate, the impacts on landscape, wildlife and flooding. There is likely to be negative impacts on congestion and air pollution unless improvements to the key road junctions are delivered.

### 4.3.2 Option 2: 800 dpa

This option increases the likelihood on negative impacts on biodiversity and on landscape and urban forms / townscape as the land required at each settlement will be greater. Therefore it will be harder to avoid those sites with the greater impacts or to leave the more sensitive parts of those sites undeveloped. The transport and air quality impacts are still capable of mitigation and no additional exceedances of air quality are predicted from modelling work. However additional waste water treatment capacity is very likely to be required, which would delay delivery of housing. The space available within sites for SUDS, green infrastructure and other benefits is likely to diminish. Positive impacts include greater potential for low and zero carbon technologies on large sites, higher levels of affordable housing and other economic benefits.

### 4.3.3 Option 3: 1,000 dpa

At this level of development all the available strategic development locations as previously identified will have to be utilised in full and in many cases a high density of development is assumed in order to fit the numbers onto the available / deliverable sites. In consequence of this, severe negative impacts are predicted across a range of issues. The impacts on biodiversity, waste water treatment capacity, traffic congestion and landscape are predicted to be severe enough that mitigation measures are not likely to fully reduce them. For air pollution, this is assessed (in the Transport Assessment) as remaining within Air Quality standards subject to mitigation measures being secured, including improvements to key junctions and with anticipated technological changes to vehicles. Nevertheless this option increases levels of air pollution and is likely to put pressure on the road network in general. The option is likely to meet part of a wider housing need (beyond local) and bring additional affordable housing. Positive impacts are also predicted for the use of low and zero carbon technologies given that most sites will be large enough to incorporate a full range of such technologies. Economic impacts will generally be positive apart from the impacts on rural and farm businesses that will lose land. There is also a risk that quality of life and landscape impacts may reduce the attractiveness of the plan area to some businesses.

#### 4.3.4 Conclusion

On the basis of the assessment of the likely impact of the above options and national planning policy, Option 1 was identified as the recommended preferred approach to take forward in the Local Plan Review.

### 4.4 Spatial Strategy Options Considered

- 4.4.1 On the basis that Option 1 for housing numbers is being taken forward, five different spatial distribution options for meeting the additional level of housing development required above the 'committed' supply were identified and assessed prior to the Preferred Approach consultation each of these totalling 4,900 dwellings. Options 1 and 2 concentrated on the existing settlements hubs, rather than the primary focus being Chichester City. Option 2 reduced numbers at East Wittering and Selsey to try and alleviate concerns about the road network on the Manhood Peninsula. Consequently Option 2 increased numbers at Southbourne, Hambrook, Bosham and Fishbourne, the main settlements along the A259 to the west of Chichester.
- 4.4.2 Option 3 focussed development on Chichester City, albeit with locations identified on the outskirts of Chichester City, acknowledging that the most accessible sites had already been allocated in the adopted Local Plan. Hence in this scenario the nearby settlements of Fishburne and Hunston were also considered as being within the wider Chichester City environs. Option 4 looked at avoiding any strategic allocation on the Manhood Peninsula, and as a result returned to a focus on the settlements along the east-west corridor. Option 5 looked at dispersing development around all the locations, deliberately avoiding any particular focus on one settlement. Following further discussions Option 1A was added, having been developed from Option 1. This sought to take into account the likely deliverable land availability at the locations whilst also reducing numbers on the Manhood Peninsula, albeit more moderately than options 2, 3 and 4.
- 4.4.3 The option of a new settlement to meet the housing needs was also considered. However this was ruled out at an early stage due to the long lead times in delivering a new settlement. Therefore this option was not taken forward for assessment. Should the Council revisit this option in the future, a full Sustainability Assessment will need to be undertaken on the option.
- 4.4.4 Following the Preferred Option consultation, two new options were developed in consultation with the Local Plan Review team. These alternative spatial development strategies were developed for consideration by elected members ahead of the submission of the Local Plan Review. They are to be tested through a revised evidence base including the Sustainability Appraisal, the Habitats Regulations Assessment and also the transport and air quality modelling. At the same time Option 5 was dropped from further consideration as it had the highest levels of negative impacts and the lowest levels of positive impacts.
- 4.4.5 The first new option (called 1B) was developed from the Preferred Approach Option 1A, but looked to maximise numbers at the locations East of Chichester and South West of

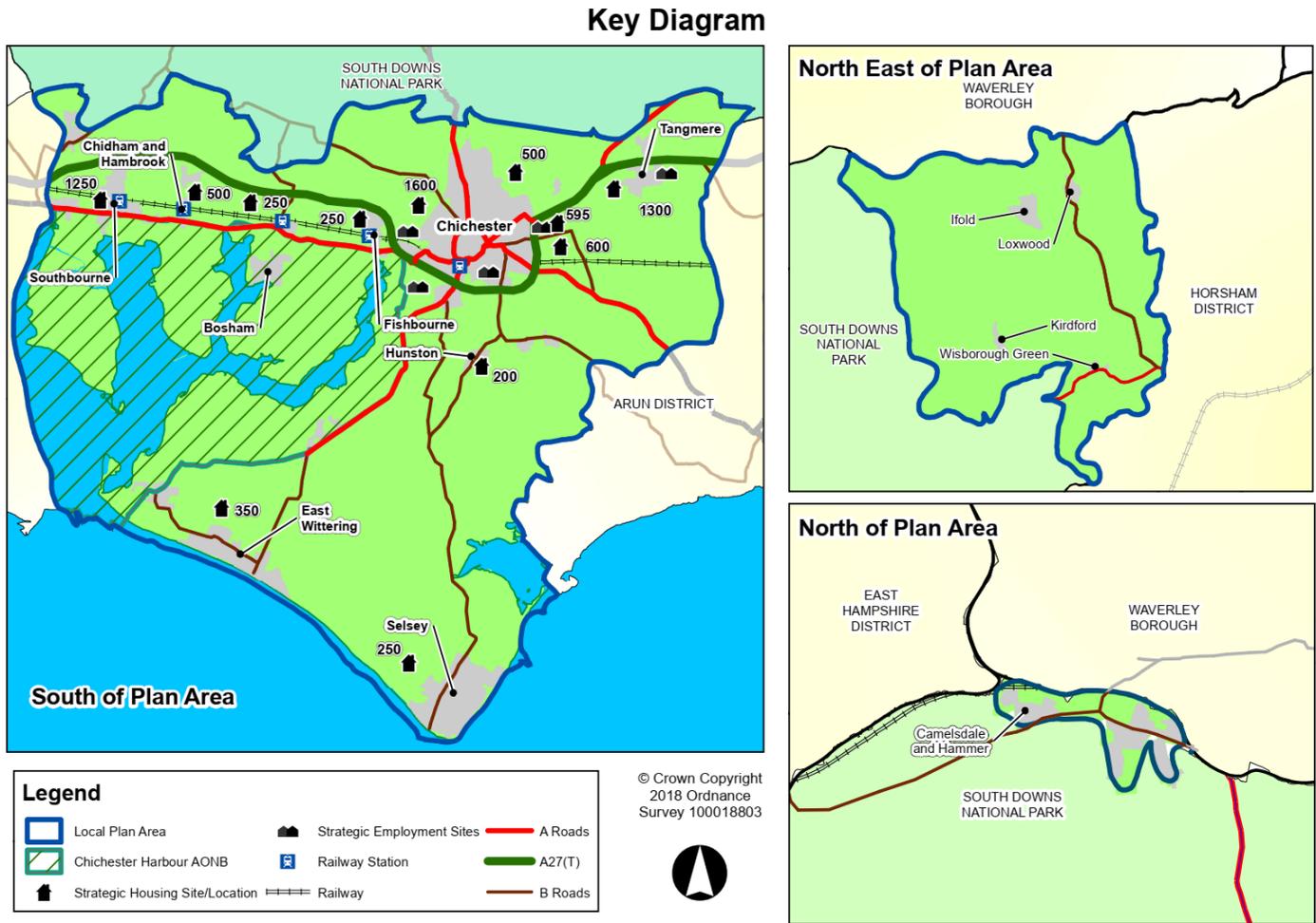
Chichester. With a small increase in the Parish numbers, this leads to an increase in housing provision from 4,900 to 5,625 (c.700 dpa).

- 4.4.6 The second new option (option 6) takes a very different approach and tests a scenario for delivering primarily in the north east of the plan area. This area has been proposed for only low levels of housing development in all the other options. This had meant that the advantages and disadvantages of development in this area had not been tested or drawn out in the SA process before this stage. The greenfield locations in the south of the plan area were retained but reduced to 100 dwellings each. The brownfield sites were kept as per the other options. The 3,250 allocation for the north east was not specifically parcelled out to specific locations, so could imply one very large location (in effect a new village) or several large extensions to existing settlements. As with the other new option at this stage, the overall number of additional dwellings is 5,625.

**Table 3: Updated spatial distribution strategies for testing through the evidence base (August 2019)**

Parish	Option 1: Focus on Settlement hubs and E/W corridor	Option 1A (Preferred Option LPR)	Option 1B: Revision to the Preferred Approach Plan [new option]	Option 2: Focus on E/W corridor	Option 3: Focus on Chichester city	Option 4 : minimise development on the Manhood Peninsula	Option 5 : Dispersed Distribution [not considered further]	Option 6 : Northern Focus [new option]
Southbourne	750	1,250	1,250	1,250	250	1,250	500	100
East Wittering	750	350	350	175	0	0	500	100
Selsey	750	250	250	175	0	0	500	100
East of Chichester	600	600	1,000	600	600	600	600	600
Hambrook	600	500	500	750	500	700	500	100
Fishbourne	250	250	250	500	1,000	700	500	100
Bosham	250	250	250	500	500	700	500	100
Hunston	0	200	200	0	1,000	0	200	100
Birdham	0	0	0	0	100	0	150	0
Tangmere	0	300	300	0	0	0	0	100
Chichester (Southern Gateway)	350	350	350	350	350	350	350	350
South West of Chichester	100	100	300	100	100	100	100	0
North East of Plan Area (strategic)	0	0	0					3,250
Parish numbers	500	500	625	500	500	500	500	625
<b>Total</b>	4,900	4,900	5,625	4,900	4,900	4,900	4,900	5,625

These form the 7 options for a spatial strategy assessed with the full SA matrix below (option 5 was dropped). The locations and parishes listed are shown in the Key Diagram below.



#### 4.5 Spatial Strategy Assessment Matrices

**Table 4 – Sustainability Appraisal of the Options for Spatial Distribution of Residential Development (Options 1, 1A and 1B)**

Assessment Criteria		Option1 - Focus on the Settlement Hubs and the East / West corridor	Option 1A - Strategy of the Preferred Option	Option 1B - Revisions to the Preferred Approach Strategy
1A	<b>Does the option prevent biodiversity loss and habitat fragmentation?</b>	- High numbers at Selsey risk negative impact on Pagham Harbour and Medmerry Compensatory Habitat	+ Most sites can be accommodated within lower quality habitat, so losses minimised, provided that north south Strategic Wildlife Corridors are protected	+ Most sites can be accommodated within lower quality habitat, so losses minimised, provided that north south Strategic Wildlife Corridors are protected. However increase in numbers at SW Chichester will put more pressure on the harbour compared to Option 1A
1B	<b>Does the option allow for movement of habitats with climate change?</b>	- Higher housing numbers at East Wittering and Hambrook compared to other options may be difficult to accommodate whilst protecting existing linkages	+ A positive option for this assessment criteria because of the reductions in numbers at Broadbridge and Hambrook compared to Option 1 and the use of Tangmere and Southbourne, which are outside key corridors.	+ A positive option for this assessment criterion because of the reductions in numbers at Broadbridge and Hambrook compared to Option 1 and the use of Tangmere and Southbourne, which are outside key corridors. This assumes that the additional numbers East of Chichester do not encroach on the Wildlife corridor to the East of the City

Assessment Criteria		Option1 - Focus on the Settlement Hubs and the East / West corridor		Option 1A - Strategy of the Preferred Option		Option 1B - Revisions to the Preferred Approach Strategy	
1C	Does the option enhance and/or restore biodiversity opportunities and create new habitat?	+	Sites at Selsey and Hambrook may be constrained for space within the site to deliver enhancements. Positive opportunities at Southbourne and East Wittering	+	Larger allocation at Southbourne more likely to achieve Green Ring enhancements, but Hambrook will be constrained for space within the development sites	+	Similar profile of impacts to Option 1A, but the additional development SW of Chichester may enhance the opportunity for creation of wetland habitat in the flood zone of the Lavant
2A	Does the option protect water resources?	N/a	This depends more on the overall level of development, and the design standards used in the development, rather than the location-specific characteristics	N/a	This depends more on the overall level of development, and the design standards used in the development, rather than the location-specific characteristics	N/a	This depends more on the overall level of development, and the design standards used in the development, rather than the location-specific characteristics
2B	Does the option maximise use of waste resources?	N/a	Not location specific	N/a	Not location specific	N/a	Not location specific
2C	Does the option make efficient use of energy?	0	Overall neutral mix of sizes and locations, but no single very large site	+	Use of one very large location improves the likelihood of delivering local heat networks within the site (Southbourne) but smaller sites elsewhere will not sustain such systems	++	Use of two very large locations improves the likelihood of delivering local heat networks within those locations (Southbourne and East of Chichester) but smaller sites elsewhere will not sustain such systems

Assessment Criteria		Option1 - Focus on the Settlement Hubs and the East / West corridor	Option 1A - Strategy of the Preferred Option	Option 1B - Revisions to the Preferred Approach Strategy
3A	<b>Does the option reduce air pollution from industrial processes and transport?</b>	- Impact will be from transport emissions. Although the focus on the hubs should help reduce journeys for and to certain facilities, the locations will still put pressure on local 'A' roads and the A27. 1,850 of the homes will be near rail stations	0 Spread of development should help mitigate air quality problems from congestion, but also increases the number of settlements subject to more localised traffic pressures. 2,600 homes near railway stations	0 Spread of development should help mitigate air quality problems from congestion, but also increases the number of settlements subject to more localised traffic pressures. Increase in overall numbers compared to 1A increases the risk of negative impact. Further transport modelling work is being undertaken which will then refine this assessment
3B	<b>Will the option assist the remediation of contaminated land?</b>	0 Most sites on previously undeveloped land but some options to use previously developed land not requiring remediation	0 Most sites on previously undeveloped land	+ The increase in numbers at East of Chichester location improved the likelihood of contaminated land within that location being remediated through development
3C	<b>Does the option reduce levels of water pollution?</b>	- Some options have potential to cause pollution from run-off to ditches and rivers	- Potential of pollution from run-off at Shopwyke, Hambrook and Southbourne	- Potential of pollution from run-off at Shopwyke, Hambrook and Southbourne

Assessment Criteria		Option1 - Focus on the Settlement Hubs and the East / West corridor	Option 1A - Strategy of the Preferred Option	Option 1B - Revisions to the Preferred Approach Strategy
3D	Does the option require new waste water treatment capacity?	- Water quality assessment indicates growth can generally be accommodated with upgrades. However the impact of cumulative housing numbers on capacity at Sidlesham will need further investigation. Separately to capacity issues, the impacts of addition nutrients on the harbours will need to be mitigated	- Water quality assessment indicates growth can generally be accommodated with upgrades. However the impact of cumulative housing numbers on capacity at Thornham will need further investigation. Separately to capacity issues, the impacts of addition nutrients on the harbours will need to be mitigated.	- Water quality assessment indicates growth can generally be accommodated with upgrades. However the impact of cumulative housing numbers on capacity at Thornham and Apuldram will need further investigation. Separately to capacity issues, the impacts of addition nutrients on the harbours will need to be mitigated.
4A	Does the option maximise the use of renewable and low carbon energy sources?	0 No single very large site which means there is less opportunity for low or zero carbon technologies	+ Greater opportunity for incorporating low or zero carbon technologies on larger sites	+ Greater opportunity for incorporating low or zero carbon technologies on larger sites
4B	Does the option reduce the need to travel?	0 Focus on the hubs should reduce the need to travel to some facilities, however there will still be a need to travel to Chichester to access larger facilities	0 Focus on the hubs should reduce the need to travel to some facilities, however there will still be a need to travel to Chichester to access larger facilities	0 Focus on the hubs should reduce the need to travel to some facilities, however there will still be a need to travel to Chichester to access larger facilities
5A	Does the option reduce the risks of coastal, fluvial surface water and groundwater flooding?	- Some areas within the flood zones, particularly at Selsey, Hambrook and East Wittering where run-off could increase surface water flooding	0 No significant impacts from two of the largest sites, avoiding flood zones at other sites should minimise impacts	0 No significant impacts from two of the largest sites, avoiding flood zones at other sites should minimise impacts

Assessment Criteria		Option1 - Focus on the Settlement Hubs and the East / West corridor		Option 1A - Strategy of the Preferred Option		Option 1B - Revisions to the Preferred Approach Strategy	
5B	Does the option increase the use of SUDS and provide opportunities for restoring natural function to rivers and coastal systems?	+	Land available and size of developments mean enhanced opportunities to develop a range of SUDS techniques	+	Land available and size of larger developments, means opportunity to develop a range of SUDS techniques	+	Land available and size of larger developments, means opportunity to develop a range of SUDS techniques
6A	Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?	0	1850 new homes near a railway station and opportunities to improve bus services, however access from the Manhood Peninsula restricted by the A27.	+	More positive than Option 1 due to greater numbers (2,600) near railway stations	+	More positive than Option 1 due to greater numbers (2,600) near railway stations. However additional numbers over Option 1A are not near rail and bus lines
6B	Does the option improve networks for cyclists and pedestrians?	+	Some opportunities to improve existing cycling/pedestrian routes particularly for sites closer to the City Centre. Development at Selsey would increase the viability of the Chichester to Selsey Cycle Path.	+	Some opportunities to improve cycle links to Chichester and Emsworth	+	Some opportunities to improve cycle links to Chichester and Emsworth. Good links across the A27 will be needed for the locations East and SW of Chichester
6C	Does the option reduce congestion?	-	Development at the hubs may reduce need to travel for some services and improve transport networks, however still likely to be congestion at certain junctions	-	Largest site may generate new transport infrastructure, however additional congestion on A27 junctions at Chichester and Havant is likely	-	Largest locations at Southbourne and East of Chichester will put additional pressure on A27 junctions at Chichester and Havant

Assessment Criteria		Option1 - Focus on the Settlement Hubs and the East / West corridor		Option 1A - Strategy of the Preferred Option		Option 1B - Revisions to the Preferred Approach Strategy	
7A	Does the option encourage sustainable land management practices to conserve landscapes?	-	Local impacts will be significant with urbanisation of the landscape. Large development at Selsey likely to impact on Church Norton and Pagham Harbour	-	Local impacts of development likely to be significant	-	Local impacts of development likely to be significant
7B	Does the option ensure protection of traditional urban forms?	-	The impact is concentrated at the hubs rather than a large number of sites but impact on those, particularly Hambrook, likely to be significant	-	The impact is distributed over a large number of sites but will also be significant at Hambrook and Southbourne	-	The impact is distributed over a large number of sites but will also be significant at Hambrook and Southbourne
7C	Does the option ensure conservation and enhancement of the historic environment, heritage assets and their settings?	0	Few heritage assets at the hub locations, some archaeology which will need to be considered	0	Heritage assets not present or can be avoided, some archaeology will need to be considered	0	Heritage assets not present or can be avoided, some archaeology will need to be considered

Assessment Criteria		Option1 - Focus on the Settlement Hubs and the East / West corridor	Option 1A - Strategy of the Preferred Option	Option 1B - Revisions to the Preferred Approach Strategy
8A	Does the option meet local housing needs?	++ Good land availability at locations to meet housing needs.	+ Good land availability at locations to meet housing needs. Some issues around deliverability in the short term due to size of the larger developments, however this is likely to be offset by large numbers of smaller sites	++ Increase in overall numbers compared to Option 1A. Good land availability at locations to meet housing needs. Some issues around deliverability in the short term due to size of the larger developments, however this is likely to be offset by the smaller sites and increased parish numbers.
8B	Does the option provide the right housing mix of size and tenure and the continuation of a sustainable mix of people within communities?	+ Bigger sites likely to achieve some mix of tenure, but less so than the >1000 unit sites	++ Likely to achieve the desired mix of tenure on the largest site	++ Likely to achieve the desired mix of tenure on the largest sites
9	Does the option provide access to services and facilities?	+ Additional development at the hubs is likely to improve access to existing services and facilities, but need to travel to Chichester City for larger facilities	+ Improved access to services at larger sites and improved access to City Centre.	+ Similar to the profile for Option 1A. Slightly more positive as the increase in housing numbers fall close to Chichester city. The increase in parish numbers only partially offsets this.

Assessment Criteria		Option1 - Focus on the Settlement Hubs and the East / West corridor		Option 1A - Strategy of the Preferred Option		Option 1B - Revisions to the Preferred Approach Strategy	
10A	Does the option ensure that economic opportunities are accessible to all?	+	Focus on settlements with good existing levels of employment should help match housing provision to job locations	+	Positive impacts, with similar issues to Option 2 , but more development on Manhood helps prevent long term population decline there and makes this option slightly more positive than options 2, 3 and 5	+	Positive impacts, as the option delivers housing over a range of locations in the south of the plan area, and slightly more housing near Chichester than Option 1A. Concern about Southbourne similar to options 1A and 2
10B	Does the option ensure that value added is retained in the District?	+	Major housing locations are unlikely to encourage commuting out of the District for work	0	Neutral on balance. Large allocations in the A259 corridor meeting the needs of a wider travel to work area e.g. Havant, Portsmouth	0	Neutral on balance. Large allocations in the A259 corridor meeting the needs of a wider travel to work area e.g. Havant, Portsmouth
11A	Does the option encourage innovation?	N/a	Not location specific	N/a	Not location specific	N/a	Not location specific
11B	Does the option develop knowledge based economy locally?	-	Chichester City has been historically the focus for knowledge based economy, and this option pushes housing away from the City	-	Chichester City has been historically the focus for knowledge based economy, and this option pushes housing away from the City	-	Chichester City has been historically the focus for knowledge based economy, and this option pushes housing away from the City
12A	Does the option ensure skills are enhanced to increase access to work?	N/a	Not location specific	N/a	Not location specific	N/a	Not location specific

Assessment Criteria		Option1 - Focus on the Settlement Hubs and the East / West corridor		Option 1A - Strategy of the Preferred Option		Option 1B - Revisions to the Preferred Approach Strategy	
12B	Does the option ensure a skilled workforce is available locally to allow business development?	+	Focus on development hubs should match housing to job locations	+	Housing development across a wide range of areas will support local business development	+	Housing development across a wide range of areas will support local business development
13A	Does the option promote a prosperous and diverse rural economy?	+	Supports the expansion of the settlement hubs, which in turn supports the rural economy.	+	Supports the expansion of the settlement hubs, which in turn supports the rural economy.	+	Supports the expansion of the settlement hubs, which in turn supports the rural economy.
13B	Does the option avoid the loss of the Best and Most Versatile agricultural land?	-	Negative due to losses at Selsey and Southbourne	-	Negative due to large losses around Southbourne	-	Negative due to large losses around Southbourne

Table 4 continued – Options 2-6

Assessment Criteria		Option 2 - Focus on the East / West Corridor	Option 3 - Focus on Chichester City	Option 4 - Minimise development on the Manhood Peninsula	Option 6 - Northern Focus
1A	Does the option prevent biodiversity loss and habitat fragmentation?	+	-	0	-
		Most sites can be accommodated within lower quality habitat, so losses minimised, provided that north south Strategic Wildlife Corridors are protected	Negative impact on the habitats around Mundham and Hunston	Most sites can be accommodated within lower quality habitat, so losses minimised, provided that north south corridors are protected, but this will be more difficult than for Options 1a and 2 due to the increased numbers at Fishbourne and Bosham	This option reduces the impact on the Harbours through recreational disturbance. However it has the potential to impact protected sites in the north, including the Mens and Ebernoe common through impacts on bats flightlines and potentially Arun Valley SSPA through water quality issues.
1B	Does the option allow for movement of habitats with climate change?	-	-	-	+
		Negative impact from the amount of land take in the E/W corridor, reducing connectivity between the Harbour and the South Downs	Overall some negative impact as the wider Chichester City area becomes impermeable and this outweighs the benefits to the Manhood Peninsula and wildlife corridors to the West of the E/W corridor	Negative impact from the amount of land take in the E/W corridor, reducing connectivity between the Harbour and the South Downs	Small developments in the E/W corridor will not interrupt connection between the Harbour and the Downs. Localised impacts in the northern plan area but overall less impact than other options

Assessment Criteria		Option 2 - Focus on the East / West Corridor		Option 3 - Focus on Chichester City		Option 4 - Minimise development on the Manhood Peninsula		Option 6 - Northern Focus	
1C	Does the option enhance and/or restore biodiversity opportunities and create new habitat?	+	Larger allocation at Southbourne more likely to achieve Green Ring enhancements, but Hambrook and Broadbridge will be constrained for space within the development sites	-	Negative impact as it focusses development into areas without the space or the connections to fully deliver enhancements	0	Positive opportunities at Southbourne counter balanced by constraints at Broadbridge and Hambrook	+	Some uncertainty due to distribution within the northern plan area; but assuming at least one very large site, this would have the potential and the land availability to create new habitats.
2A	Does the option protect water resources?	N/a	This depends more on the overall level of development, and the design standards used in the development, rather than the location-specific characteristics	N/a	This depends more on the overall level of development, and the design standards used in the development, rather than the location-specific characteristics	N/a	This depends more on the overall level of development, and the design standards used in the development, rather than the location-specific characteristics	N/a	This depends more on the overall level of development, and the design standards used in the development, rather than the location-specific characteristics
2B	Does the option maximise use of waste resources?	N/a	Not location specific	N/a	Not location specific	N/a	Not location specific	N/a	Not location specific
2C	Does the option make efficient use of energy?	+	Use of one very large location improves the likelihood of delivering local heat networks within the site	++	The two large allocations will both be large enough to deploy a full range of energy efficiency and LZC energy measures	+	Use of one very large location improves the likelihood of delivering local heat networks within the site	++	Use of one or two large allocations is implied, which will be large enough to deploy a full range of energy efficiency and LZC energy measures

Assessment Criteria		Option 2 - Focus on the East / West Corridor	Option 3 - Focus on Chichester City	Option 4 - Minimise development on the Manhood Peninsula	Option 6 - Northern Focus
3A	Does the option reduce air pollution from industrial processes and transport?	0 This option will relieve pressure from traffic trying to cross the A27 to access the City. However there will be considerable additional pressure on the A259 / A27 junctions at Chichester and Havant. 3,000 homes near rail stations	-- Large allocation at Broadbridge and Fishburne, put pressure on the link with the A27 at Fishbourne, which is not mitigated by the much lower number at Southbourne as that may access the trunk road by other means. The large allocation at Hunston will also exacerbate congestion without improvements to the A27	0 This option will relieve pressure from traffic trying to cross the A27 to access the City. However there will be considerable additional pressure on the A259 / A27 junctions at Chichester and Havant. 3,350 homes near rail stations	- Further transport and air quality modelling work is needed to inform this assessment more fully. However, whilst this option appears to reduce the pressure on the A27, it runs the risk of creating problems elsewhere including adjoining authority areas ( e.g. Pulborough, Billingshurst), especially as alternative to the car are lacking in this area.
3B	Will the option assist the remediation of contaminated land?	0 Most sites on previously undeveloped land but some options to use previously developed land not requiring remediation	0 Most sites on previously undeveloped land without the option of remediation	0 Most sites on previously undeveloped land without the option of remediation	+ Development on this scale has the potential to enable the clean-up of the land at Crouchlands Farm
3C	Does the option reduce levels of water pollution?	- Some options with the potential to cause pollution from run-off to ditches and rivers	- Potential of pollution from run-off at Hunston, Hambrook and Shopwyke	- Potential of pollution from run-off at Southbourne, Shopwyke and Hambrook	- Potential for increased run off into the Kird and other tributaries of the Arun

Assessment Criteria		Option 2 - Focus on the East / West Corridor	Option 3 - Focus on Chichester City	Option 4 - Minimise development on the Manhood Peninsula	Option 6 - Northern Focus
3D	Does the option require new waste water treatment capacity?	- Water quality assessment indicates growth can generally be accommodated with upgrades. However the impact of cumulative housing numbers on capacity at Thornham and potentially Bosham, will need further investigation.	- Water quality assessment indicates growth can generally be accommodated with upgrades. However the impact of cumulative housing numbers on capacity at Pagham and potentially Bosham, will need further investigation.	- Water quality assessment indicates growth can generally be accommodated with upgrades. However the impact of cumulative housing numbers on capacity at Thornham and Bosham, will need further investigation.	- New capacity would need to be crated to facilitate this scale of development. The WwTWs are probably constrained by the potential for impact of nutrients on Arun Valley SPA, downstream of them, Uncertain impact - this will need further investigation and evaluation to inform a final decision
4A	Does the option maximise the use of renewable and low carbon energy sources?	+ Greater opportunities for incorporating low or zero carbon technologies on large sites	++ More large sites, maximises the opportunities for incorporating low or zero carbon technologies	+ Greater opportunity for incorporating low or zero carbon technologies on larger sites	++ More large sites, maximises the opportunities for incorporating low or zero carbon technologies
4B	Does the option reduce the need to travel?	- Likely to be increased commuting into Chichester, particularly from Southbourne and Hambrook	+ Focus of development around Chichester City will reduce the distances travelled for main facilities	- Although additional facilities likely at Southbourne, there is likely to be increased commuting into Chichester from the other sites	-- This option locates housing away from existing employment sites and facilities such as hospitals major shopping centres and colleges / university. It will substantially increase the need to travel.

Assessment Criteria		Option 2 - Focus on the East / West Corridor		Option 3 - Focus on Chichester City		Option 4 - Minimise development on the Manhood Peninsula		Option 6 - Northern Focus	
5A	Does the option reduce the risks of coastal, fluvial surface water and groundwater flooding?	0	Development at Fishbourne and Broadbridge should be planned to avoid flood zones and minimise run-off	-	Some areas of Hambrook and Fishbourne within the flood zones	0	Development at Fishbourne and Hambrook should be planned to avoid flood zones and minimise run-off	0	Neutral impact overall , provided that development site choices avoid the small flood risk zones around the river corridors
5B	Does the option increase the use of SUDS and provide opportunities for restoring natural function to rivers and coastal systems?	+	Land available and size of developments mean enhanced opportunities to develop a range of SUDS techniques	++	More large sites, maximises the opportunities for incorporating a range of SUDS techniques	+	Land available and size of developments mean enhanced opportunities to develop a range of SUDS techniques	+	Land available and size of developments mean enhanced opportunities to develop a range of SUDS techniques. However this will be location specific as certain areas in the north plan areas have limited ability to absorb runoff
6A	Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?	+	3000 homes near existing rail stations to potential for modal shift and better integration of bus and train network	+	Larger developments already served by train and bus links which may be enhanced with increased development	+	Most sites already served by train and bus services	--	Nearest access to rail network are at Billingshurst and Haslemere, both involve a considerable drive. Development on this scale could make rural bus services more viable, but this is not certain to happen

Assessment Criteria		Option 2 - Focus on the East / West Corridor		Option 3 - Focus on Chichester City		Option 4 - Minimise development on the Manhood Peninsula		Option 6 - Northern Focus	
6B	Does the option improve networks for cyclists and pedestrians?	+	Some opportunities to improve cycle links to Chichester and Emsworth	+	Concentration of development around Chichester City likely to improve networks for cyclists and pedestrians	+	Opportunities to improve networks from Southbourne, Shopwyke and Fishbourne	-	Other than some localised improvement, the remoteness of the locations from the existing networks means this is unlikely to deliver substantial improvements
6C	Does the option reduce congestion?	-	Largest site may generate new transport infrastructure, however additional congestion on A27 junctions at Chichester and Havant is likely	--	Large allocation at Broadbridge and Fishbourne, put pressure on the link with the A27 at Fishbourne, which is not mitigated by the much lower number at Southbourne. The large allocation at Hunston will also put pressure on the local road network in that area.	-	Although there will be less pressure from traffic trying to cross the A27 to enter the City, there is likely to be increased congestion at the A27 junctions between Chichester and Havant	0	Uncertain impact, more work is needed to inform this assessment. The option will increase the number of car journeys but where they will go and whether those journey will disperse across West Sussex and Surrey, or be drawn back to add to congestion on the A27 is uncertain at this point.
7A	Does the option encourage sustainable land management practices to conserve landscapes?	-	Local impacts of development likely to be significant	-	Local impacts of development likely to be significant	-	Local impacts at Southbourne, Hambrook, Fishbourne and Broadbridge are likely to be significant	-	Local impacts of development likely to be significant

Assessment Criteria		Option 2 - Focus on the East / West Corridor	Option 3 - Focus on Chichester City	Option 4 - Minimise development on the Manhood Peninsula	Option 6 - Northern Focus
7B	Does the option ensure protection of traditional urban forms?	-- The impact is concentrated on a small number of settlements along A27, however local impacts, particularly at Fishbourne, Hambrook and Broadbridge likely to be significant	-- Impacts on Fishbourne, Hunston, Hambrook and Broadbridge likely to be very significant	-- Impacts on Hambrook, Fishbourne and Broadbridge are likely to be significant	- Scale of development would have major impacts on existing settlement, including Wisborough Green, Kirdford, Plaistow and Ifold. The alternative of a new settlement would reduce this.
7C	Does the option ensure conservation and enhancement of the historic environment, heritage assets and their settings?	0 Heritage assets not present or can be avoided, some archaeology will need to be considered	0 Heritage assets not present or can be avoided, some archaeology will need to be considered	0 Heritage assets can be avoided, archaeology will need to be considered	0 Impacts depends on site choices, there should be enough choice of sites to avoid those with impacts on the historic environment.
8A	Does the option meet local housing needs?	+ Good land availability at locations to meet housing needs. Some issues around deliverability in the short term due to size of the larger developments	0 Development likely to meet housing need around the City in the longer term. However less likely to meet housing need elsewhere at other hubs. Also issue of deliverability in the short term due to the higher number of large sites	0 Option meets housing need across the local plan area over the longer term, although may not meet housing need on Manhood Peninsula. Deliverability may be an issue in the short-term due to the size of the developments.	- This is a major drawback of this option. Although it delivers great housing numbers than some other options. It does not meet the localised needs of Chichester city of the settlement hubs in the south of the plan area, other than by long commutes. It over delivers for the housing need of the north and the SDNP adjoining.

Assessment Criteria		Option 2 - Focus on the East / West Corridor		Option 3 - Focus on Chichester City		Option 4 - Minimise development on the Manhood Peninsula		Option 6 - Northern Focus	
8B	Does the option provide the right housing mix of size and tenure and the continuation of a sustainable mix of people within communities?	++	Likely to achieve the desired mix of tenure on the largest site	++	Likely to achieve the desired mix of tenure on the larger sites	++	Likely to achieve the desired mix of tenure on the larger sites	0	Overall neutral. Large sites likely to deliver the mix of size and tenure. However the more remote location means that maintaining sustainable mix in the community is more doubtful
9	Does the option provide access to services and facilities?	+	Improved access to services at larger sites and improved access to City Centre	++	Focus of development around Chichester City will ensure good access to services and facilities. Opportunities for enhanced local facilities at the bigger sites	+	Focus at Southbourne and close to City Centre will ensure access to services through better services at Southbourne and relatively easy access to City Centre including by train and bus	--	The area is relatively lacking in services and facilities compared to the south of plan area options
10A	Does the option ensure that economic opportunities are accessible to all?	+	Positive, but the scale of development in Southbourne is unlikely to be matched by additional local jobs and so some commuting will be required	0	Focus on the city will have positive impacts but the economic needs of other areas are downplayed, balancing this positive out. Overall neutral.	0	Positive across the Bournes, but counter balanced by zero development in the Manhood area	-	Mismatch between location of new housing and employment needs.

Assessment Criteria		Option 2 - Focus on the East / West Corridor		Option 3 - Focus on Chichester City		Option 4 - Minimise development on the Manhood Peninsula		Option 6 - Northern Focus	
10B	Does the option ensure that value added is retained in the District?	0	Large allocations in the A259 corridor meeting the needs of a wider travel to work area e.g. Havant, Portsmouth	+	Focus on the city will retain economic gains within the wider District	0	Concentration on the Bournes will also support the needs of a wider travel to work area e.g. Havant, Portsmouth	-	Lack of existing employment opportunities means that development is likely to serve commuters out into Horsham and Waverley districts.
11A	Does the option encourage innovation?	N/a	Not location specific	N/a	Not location specific	N/a	Not location specific	N/a	Not location specific
11B	Does the option develop knowledge based economy locally?	-	Chichester City has been historically the focus for knowledge based economy, and this option pushes housing away from the City, mitigated slightly by more housing at Fishbourne	+	Chichester City has been historically the focus for knowledge based economy.	0	Chichester City has been historically the focus for knowledge based economy, and this option pushes housing away from the City, mitigated by more housing at Fishbourne than most other options. Overall neutral	-	Chichester City has been historically the focus for knowledge based economy, and this option pushes housing away from the City to a greater extent than any of the other options
12A	Does the option ensure skills are enhanced to increase access to work?	N/a	Not location specific	N/a	Not location specific	N/a	Not location specific	N/a	Not location specific

Assessment Criteria		Option 2 - Focus on the East / West Corridor	Option 3 - Focus on Chichester City	Option 4 - Minimise development on the Manhood Peninsula	Option 6 - Northern Focus
12B	Does the option ensure a skilled workforce is available locally to allow business development?	- Existing businesses on the Manhood may find it more difficult to recruit as low level of strategic housing development will lead to flat population level over long term	0 Overall neutral, city businesses well supported but other areas needs are not addressed to the same extent	- Existing businesses on the Manhood may find it more difficult to recruit as lack of strategic housing development will lead to long term population decline as household size continues its trend of diminishing over time	- Mismatch between location of new housing and employment needs.
13A	Does the option promote a prosperous and diverse rural economy?	+ Positive for the E/W corridor, but less so for the Manhood	0 Focus on the city is not supportive but not detrimental either	0 Overall neutral, Positive for the E/W corridor, but counterbalanced by impact on the manhood	- Overall negative, due to lack of support for rural economy in the south outweighing any benefits in the NE area
13B	Does the option avoid the loss of the Best and Most Versatile agricultural land?	- Negative due to large losses around Southbourne	- Losses at Hunston and North Mundham rather than Southbourne	- Negative due to large losses around Southbourne	+ Loss of Grade 3 and 4 land only

## 4.6 Summary of Effects

4.6.1 Some cross cutting themes emerge from the assessment which holds for most, if not all the options. These are: capacity for waste water treatment, impacts on the landscape and the existing character/form of settlements and also the loss of best and most versatile agricultural land.

### 4.6.2 Option1 - Focus on the Settlement Hubs and the East / West corridor

This option has a fairly even distribution across the settlement hubs with reduced numbers at Bosham and Fishbourne. The elevated numbers on the Manhood Peninsula (1,500 in total) give rise to potential negative impacts on the protected sites (Pagham and Medmerry), land drainage management and landscape of that area. Transport impacts on the access to Chichester City from the south across the A27 are also a concern.

4.6.3 Positive impacts are predicted for meeting housing needs, utilising local facilities and services and providing economic opportunities. These reflect the spread of development across the hubs compared to a sole focus on the City.

### 4.6.4 Option 1A - Strategy of the Preferred Option Local Plan

This option was developed from Option 1 but seeks to mitigate some of the negative impacts of that option by reducing the scale of development in East Wittering and Selsey and re-distributing that housing development to Southbourne, Hunston and Tangmere, locations which are closer to Chichester City. The positive impacts broadly follow those summarised above for Option 1. Transport-related impacts are ameliorated by a greater number of homes being located with good access to a railway station and also a more even distribution of locations is anticipated to generate traffic utilising junctions around the A27 Chichester Bypass. The use of a large scale site at Southbourne has some potential advantages in terms of provision of green infrastructure and low carbon technologies, but careful mitigation by other policies will be needed to ensure new facilities and services are provided at Southbourne in proportion to the new development. There is a risk of not meeting the local housing need on the Manhood peninsula which may lead to population decline there and the potential loss of services and facilities.

### 4.6.5 Option 1B - Revisions to Preferred Approach Plan (New Option)

Overall the profile of impacts was similar to the other variations of Option 1. From which it derived. The increase in housing numbers compared to 1 and 1A increased the positive impacts on meeting housing needs and also on the economic assessment criteria, especially as most of the increase is close to Chichester city. Environmental pressures remain elevated, especially as since the Preferred Approach consultation, the issue of nutrient impacts on Chichester Harbour has become more urgent. Those impacts should be capable of being mitigated, particularly for greenfield sites, but options that add significant numbers across the Bournes (1A, 1B, 2, 4), may pose additional risks for WwTW capacity and nutrient loading in the Harbour.

### 4.6.6 Option 2 - Focus on the East / West Corridor

Here the vast majority of new development is focussed to the west of the City along the A259 and railway corridor, with no provision at Tangmere or Hunston and very limited

development on the Manhood Peninsula. This reduces some of the negative impacts of Option 1 on the Manhood (as does Option 1A) but without some of the advantages that come from a more even distribution around (and close to) Chichester City. The additional 750 homes near to the railway line will help mitigate the additional distance to travel into Chichester City for some, but not all households. There is also an increased risk of impacts due to the development becoming out-of-scale to the existing form and facilities of the settlements and also cumulative landscape and biodiversity impact as the settlements in this area begin to coalesce leaving smaller gaps between them.

#### **4.6.7 Option 3 - Focus on the area around Chichester City**

This option provides for more housing at those settlements in close proximity to the City. In particular it would involve very large allocations at Fishbourne and Hunston (on the basis of their proximity to Chichester City). Whilst this produces some economic benefits in terms of the economy and jobs focus of the City, these are counterbalanced to some extent by negative economic impacts for the Manhood Peninsula. These are assessed as coming from the zero allocations here which over the long term are, (with the continuing trend toward smaller household size), likely to lead to population decline in both real and relative terms. Congestion issues are unlikely to be resolved by this option despite the proximity to the City in straight-line terms as the A27 still acts a barrier and Hunston lacks the train link that provides some mitigation for focussing more development at Bosham and Fishbourne.

#### **4.6.8 Option 4 - Minimise development on the Manhood Peninsula**

Option 4 sets zero housing numbers for East Wittering and Selsey as does Option 3. Therefore it has a similar mix of pros and cons for wildlife and transport assessments and a similar slightly negative economic impact for the Manhood Peninsula. The greater spread of development across the west of the east west corridor provides for some amelioration of the impacts on landscape and congestion in that area but also dilutes the economic benefits compared to option 3.

N.B. Option 5 (Even Distribution) has not been included for further consideration at this stage of the plan.

#### **4.6.9 Option 6 - Northern Focus (New Option)**

The new Option 6 has a range of impacts quite distinct from the other options assessed. On the positive side, the large reduction in numbers across the east-west corridor aids habitat connectivity and reduces the loss of best and most versatile agricultural land. If it were to be implemented though once very large development there would be opportunities for low carbon energy infrastructure and on-site habitat gains. The negative impacts are primarily due to a disconnection between the location of new housing and the location of new and existing jobs. This results in poor assessments for reduced need to travel, achieving modal shift and meeting local housing needs as well as on the range of economic objectives. The effects on congestion and air quality are uncertain and would require further work on supporting evidence to allow a fuller assessment in the future.

## 4.7 Cumulative and synergistic effects

- 4.7.1 The remarks in the comments boxes in the assessment matrices above give details of any uncertainties around impact assessments that have been identified. Cumulative impacts on congestion, natural resources, biodiversity and landscape have been identified and discussed but these are mitigated but not eliminated by the effects of policies later on in the Local Plan Review on infrastructure provision, wildlife corridors, green infrastructure, good design and sustainable design and construction.
- 4.7.2 Related effects on economic criteria can also be expected in relation to the policies on employment land provision, meeting horticultural needs, city centre retail etc.

## 4.8 Strategic Site Allocation Policies

- 4.8.1 On the basis that Option 1A was identified as the preferred option for the consultation on the Local Plan Review in December 2018 - January 2019, policies on Meeting Housing Needs and also the Strategic Site Allocation Policy (AL1 to AL15) were then prepared for the Preferred Approach consultation. Of these, four proposed allocations are carried over from the adopted Local Plan unchanged and are not assessed further in this report (see Section 6). They are:

- AL1 Land West of Chichester
- AL2 Land at Shopwyke (Oving Parish)
- AL4 Land at Westhampnett / North East Chichester
- AL15 Land at Chichester Business Park, Tangmere

- 4.8.2 In addition the policy on the Tangmere Strategic Development Location is proposed to be changed by the addition of 300 dwellings as set out in Option 1A above. Tangmere was one of the locations considered for additional development in the Issues and Options stage of the Plan Review and which are listed below. The assessments of these locations at that Issues and Options stage have been revised and updated for this iteration of the SA:

- AL3 Land East of Chichester (was S1 at Issues and Options stage)
- AL5 Southern Gateway (revised from N6 at Issues and Options stage)
- AL7 Highgrove Farm, Bosham (was S7)
- AL8 East Wittering Parish (was S3)
- AL9 Fishbourne Parish (was S8)
- AL10 Chidham and Hambrook Parish (was S9)
- AL11 Hunston Parish (revised from N15)
- AL12 Land North of Park Farm, Selsey (revised from S4)
- AL13 Southbourne Parish (was S5)
- AL14 Land West of Tangmere (was assessed as S6, but the policy has been updated from the adopted plan)

- 4.8.3 Finally there is the allocation AL6 Land South West of Chichester (Apuldram and Donnington Parishes). This location was assessed at Issues and Options stage as a non-strategic site for

residential development (N10). The policy for preferred approach stage is mainly for employment led development but also includes between 100 and 300 dwellings and a new link road. Given the amount of change from Issues and Options stage, this has been treated as a new policy and is given a new, full assessment so that it can be compared to the assessment of the other AL policies (see the Appendix to this report).

## 5. Policies with Major Revisions or New Policies

These have been assessed using a simplified methodology utilising the 13 SA objectives as explained in section 2.2 above.

### 5.1 Assessment matrix

Policy Name	S5 Parish Housing Requirements	S7 Planning for Gypsies and Travellers	S8 Meeting Employment Land needs	S9 Retailing Hierarchy	S10 Local Centres, Local and Village Parades	S11 Addressing Horticultural Needs	S15 Goodwood Motor Circuit	S16 Development within the Vicinity of Goodwood	S20 Design	S21 Health and Wellbeing	S22 Historic Environment
SA Objective											
1. Protect and enhance wildlife	-	-	-	N/a	N/a	-	-	N/a	+	N/a	+
2. Maximise efficient use of natural resources	0	+	-	0	0	0	-	N/a	+	N/a	+
3. Reduce pollution and improve air quality	-	+	-	+	+	0	-	++	+	+	N/a
4. Achieve zero net increase in greenhouse gas emissions	-	0	-	0	0	-	-	N/a	+	N/a	0
5. Minimise flood risk for new and existing development	0	0	0	N/a	0	0	0	N/a	+	N/a	N/a
6. Achieve a sustainable and integrated transport system	-	0	-	+	0	N/a	0	N/a	+	0	N/a
7. Conserve and enhance landscape and built heritage	-	-	-	+	0	-	0	+	+	N/a	++
8. Increase availability of affordable housing	+	+	0	N/a	N/a	N/a	0	-	0	+	-
9. Provide access to services and facilities	0	+	++	+	+	N/a	+	N/a	+	+	N/a
10. Promote economic development to maintain quality of life and competitiveness	0	+	++	++	+	+	++	N/a	0	0	0
11. Develop a dynamic, diverse and knowledge based economy that excels in innovation	0	0	++	+	0	0	++	N/a	0	0	0
12 To develop and maintain a skilled workforce to support long-term competitiveness	0	+	++	+	+	+	++	N/a	+	+	+
13. Enable viability of the rural economy with enhanced diversity of employment opportunities	+	+	++	+	++	++	+	-	+	N/a	++

Policy Name	S23 Transport and Accessibility	S24 Countryside	S25 The Coast	S27 Flood Risk Management	S28 Pollution	S30 Strategic Wildlife Corridors	S31 Wastewater	S32 Design Strategies for SDLs	DM1 Specialist Housing	DM2 Housing Mix
SA Objective										
1. Protect and enhance wildlife	-	+	+	0	0	++	+	0	N/a	N/a
2. Maximise efficient use of natural resources	+	0	0	N/a	0	N/a	++	0	N/a	N/a
3. Reduce pollution and improve air quality	+	0	0	+	+	+	++	0	N/a	N/a
4. Achieve zero net increase in greenhouse gas emissions	+	N/a	N/a	N/a	+	N/a	N/a	0	N/a	N/a
5. Minimise flood risk for new and existing development	0	N/a	+	++	+	+	N/a	0	N/a	N/a
6. Achieve a sustainable and integrated transport system	++	0	N/a	N/a	+	N/a	N/a	+	N/a	N/a
7. Conserve and enhance landscape and built heritage	-	++	+	0	N/a	++	N/a	0	+	N/a
8. Increase availability of affordable housing	0	+	0	N/a	N/a	N/a	N/a	+	+	++
9. Provide access to services and facilities	++	+	+	N/a	0	N/a	N/a	+	+	0
10. Promote economic development to maintain quality of life and competitiveness	++	+	+	0	+	N/a	N/a	+	+	++
11. Develop a dynamic, diverse and knowledge based economy that excels in innovation	+	+	0	N/a	N/a	N/a	N/a	+	0	+
12 To develop and maintain a skilled workforce to support long-term competitiveness	+	+	+	N/a	N/a	N/a	N/a	+	0	++
13. Enable viability of the rural economy with enhanced diversity of employment opportunities	0	+	+	0	N/a	N/a	N/a	+	0	0

Policy Name	DM3 Housing Density	DM4 Exemption sites	DM10 New Employment Provision	DM16 Sustainable Design and Construction	DM23 Lighting	DM24 Air Quality	DM25 Noise	DM26 Contaminated Land	DM27 Historic Environment	DM31 Trees Hedgerows and Woodlands
SA Objective										
1. Protect and enhance wildlife	+	N/a	0	+	+	0	N/a	+	+	++
2. Maximise efficient use of natural resources	0	N/a	N/a	++	0	0	N/a	+	+	0
3. Reduce pollution and improve air quality	N/a	0	0	+	++	++	0	++	N/a	+
4. Achieve zero net increase in greenhouse gas emissions	N/a	0	+	++	0	+	N/a	-	0	0
5. Minimise flood risk for new and existing development	0	0	N/a	+	N/a	N/a	N/a	N/a	N/a	0
6. Achieve a sustainable and integrated transport system	0	N/a	+	+	N/a	++	N/a	N/a	N/a	N/a
7. Conserve and enhance landscape and built heritage	+	+	+	0	++	0	+	+	++	+
8. Increase availability of affordable housing	+	++	N/a	N/a	N/a	N/a	N/a	N/a	-	N/a
9. Provide access to services and facilities	+	+	+	0	N/a	+	N/a	N/a	N/a	N/a
10. Promote economic development to maintain quality of life and competitiveness	+	+	+	+	+	N/a	+	N/a	0	0
11. Develop a dynamic, diverse and knowledge based economy that excels in innovation	+	+	+	+	N/a	N/a	N/a	N/a	0	N/a
12 To develop and maintain a skilled workforce to support long-term competitiveness	+	+	0	0	N/a	N/a	N/a	N/a	+	N/a
13. Enable viability of the rural economy with enhanced diversity of employment opportunities	+	+	+	N/a	N/a	-	-	N/a	++	+

## 5.2 Summary of effects by policy

### 5.2.1 S5 Parish Housing Requirements 2016-2035

The main impacts of the policy are focussed at Loxwood and Birdham, as they have a larger housing allocation (125 each) taking into account their existing size, accessibility and surrounding environment. There is the potential for a slight loss of wildlife habitat and connectivity, particularly

at Birdham. Development at Birdham and Loxwood is likely to increase car use for accessing facilities at larger settlements. The potential impacts on the landscape will need to be mitigated. The policy helps to contribute towards meeting local housing need, particularly in the north east of the plan area and some affordable housing will be realised. There will be access to some services locally (such as local shops) but it is likely that there will be a need to travel to larger facilities such as hospitals and secondary schools. Housing in the chosen locations, will help support businesses in the rural areas.

### **5.2.2 S7 Meeting Gypsies, Travellers and Travelling Showpeoples' Needs**

Potential for slight loss of wildlife habitat and connectivity due to new provision and intensification on existing sites but the focus on the intensification of existing sites should make more efficient use of natural resources. The potential impacts on the landscape will need to be mitigated. The policy has the potential to meet the housing needs of the Gypsy, Traveller and Travelling Show People communities locally, improving their access to services and economic opportunities.

### **5.2.3 S8 Meeting Employment Land Needs**

Due to increased land take for meeting the employment land needs, this could result in a loss of wildlife habitats and connectivity, increased demand on local water resources and impacts on the landscape and built heritage, which will all need to be mitigated. Access to the sites by car will increase carbon emissions but this will be minimised by the focus of most employment land at strategic sites with good accessibility by non-car based travel. High levels of energy efficiency of new buildings will also help to minimise the increase in emissions which could otherwise be expected to be generated by such development. The policy is likely to bring considerable economic benefits to the plan area, including improved access to jobs, improved competitiveness, a diverse local economy and maintaining a skilled local workforce.

### **5.2.4 S9 Retailing Hierarchy and Sequential Approach**

This policy allows for additional retail provision within Chichester City and one of the sites identified is the Southern Gateway. Local and village centres will be maintained and enhanced. The main positive impacts will be economic, but also positive impacts for landscape and townscape as existing centres are protected. The main negatives are only likely to occur if out of centre retail is allowed under the sequential approach in which case there could be impacts on access to facilities as a car would be needed to access such site.

### **5.2.5 S10 Local Centres, Local and Village Parades**

This policy is similar in its impacts profile to the policy above on Hierarchy. The main benefits are economic, but by protecting existing village and other local centres that are easily accessible on foot, bus or in some cases train the policy also has benefits for air quality. As above any negative impacts are those that may occur if impact assessment and sequential test is not sufficient to prevent out-of-centre retail development, but these impacts are uncertain and so are not shown in the matrix 5.1.

### **5.2.6 S11 Addressing Horticultural Needs (see also DM15)**

These linked policies provides for additional horticultural development of 68,000m<sup>2</sup> above the level allocated in the adopted Local Plan. The land take, and nature of the type of development, are likely

to generate some biodiversity and landscape impacts but the policy keeps the additional development within the existing Runcton and Tangmere Horticultural Development Areas (HDAs) rather than creating a new HDA which will help minimise the impacts. The policy will have beneficial impact particularly in the long term by allowing the expansion of this important existing industry.

#### **5.2.7 S15 Goodwood Motor Circuit and Airfield**

Further development at Goodwood could have a slightly negative impact on wildlife habitats and connectivity due to habitat loss and also result in an increase in air pollution and greenhouse gas emissions due to increased visitors to the site by car and intensification of the use of the site by aircraft and motor vehicles. The policy requires mitigation of these impacts.

#### **5.2.8 S16 Development within the Vicinity of Goodwood Motor Circuit and Airfield**

The policy provides a presumption against noise sensitive development within a 400m buffer of the Goodwood Motor Circuit and Airfield, with benefits to the noise environment and the tranquillity of the landscape. The negative impacts are on housing growth and provision of affordable housing.

#### **5.2.9 S20 Design**

The policy encourages the incorporation of Green Infrastructure and landscaping within new development to enhance biodiversity and connectivity, promotes efficient use of energy, sustainable modes of transport, conserves the built heritage, encourages integration into the local landscape and seeks to protect amenities. The policy encourages the use of traditional building methods and materials, helping to retain local skills and encouraging the viability of the rural economy.

#### **5.2.10 S21 Health and Wellbeing**

This positively worded policy has a limited interaction with many of the SA objectives, but should have a positive impact on some SA objectives including access to services and facilities (for example health facilities, open space and leisure facilities) and also on housing provision as providing a decent and affordable home is a vital component of health and wellbeing.

#### **5.2.11 S22 Historic Environment**

The policy encourages the protection, conservation and enhancement of the historic environment and requires that development respects existing designated or natural landscapes with benefits to the landscape and wildlife. It is likely to require the use of traditional, local materials and building techniques with benefits to the rural economy and retaining traditional skills within the local workforce. Achieving the policy may have a slightly negative impact on housing affordability.

#### **5.2.12 S23 Transport and Accessibility**

The provision of additional transport infrastructure is likely to have a negative impact on wildlife habitats and connectivity and the landscape. The focus of the policy is to reduce the need for unnecessary travel and encourage the use of sustainable modes of travel and therefore seeks to achieve a sustainable and integrated transport system, with a reduction in air pollution and carbon emissions compared to a scenario without the policy. The policy encourages greater access to services, facilities and employment with the associated economic benefits that accessibility brings.

### **5.2.13 S24 Countryside**

The policy is likely to benefit wildlife and natural landscapes by encouraging proposals that protect woodlands and natural spaces, as well as the links to these areas. It will protect the countryside and built heritage from the effects of rural urbanisation by defining clear settlement boundaries. This will allow rural settlements to retain their individual identities, characters and communities. The policy encourages development that would provide local access to services, facilities and employment. This would help facilitate a diverse and prosperous rural economy. However, there needs to be careful site allocation to prevent development on the best and most versatile agricultural land.

### **5.2.14 S25 The Coast**

This policy seeks a balance for coastal management and development between habitat protection, leisure uses, marine employment uses and climate change adaptation. As such it is assessed as having positive impacts for wildlife, minimising flood risk, conserving landscape and economic development and the rural economy. No negative impacts were identified; there is a considerable synergistic effect in combination with the DM policy on 'Development around the coast'.

### **5.2.15 S27 Flood Risk Management**

This policy follows the National Planning Policy Framework in adopting a sequential approach to the location of development to avoid flood risk. It also puts a stronger emphasis than existing policy on requiring sustainable drainage systems in major developments. Unsurprisingly its main impact is upon minimising flood risk for new and existing development, where it is strongly positive. There should also be benefits in terms of reducing water pollution as more water is retained on-site and not exported to streams or the sea. No negative impacts are predicted and there is strong synergistic effect with the DM policy 'Flood Risk and Water management'.

### **5.2.16 S28 Pollution**

This policy is generally worded and although positive most of its impact derives from setting the scene for more detail DM policies on air quality, lighting, noise and contaminated land.

### **5.2.17 S30 Strategic Wildlife Corridors**

Maintaining, enhancing and creating wildlife corridors are essential to protecting wildlife in the plan area and beyond. Ensuring development does not negatively impact these areas, including established green infrastructure, will help reduce air and water pollution and flooding by serving as a natural buffer. Ensuring the preservation of these areas will also benefit the plan areas landscape and attractiveness to developers, potentially triggering new economic growth.

### **5.2.18 S31 Wastewater in the Chichester Harbour and Pagham Harbour Wastewater Treatment Catchment areas**

This policy ensures that there will be no negative impact on Chichester and Pagham Harbours by preventing development that does not include the provision of sustainable water infrastructure. Chichester and Pagham Harbours are areas of national and international importance for landscape and nature conservation. With higher housing numbers, increasing physical capacity at WWTW and upgrades to sewer networks is essential to support demand. This policy will help protect water resources and improve the ecological status of waterbodies within the plan area.

### **5.2.19 S32 Design Strategies for Strategic and Major Sites**

This policy stipulates exactly what is expected from prospective developers' master plans and design and access statements. Each site will be required to have a clear vision of the character and features that will reinforce local built and landscape heritage to promote a sense of place and community. Included within this is the provision of green spaces and green infrastructure and movement connections to these areas. The inclusion of sustainable water infrastructure will also help reduce flood risk. The policy requires housing types and tenures to meet local needs to help tackle homelessness and help to retain a skilled workforce.

### **5.2.20 AL6 Land South West of Chichester (Apuldram and Donnington Parishes)**

This policy allocates land for mainly employment use, with some housing development and a new link road. It scores very well for all economic and social assessment criteria. However, the proximity to Chichester Harbour and the River Lavant give rise to concerns about the impact on wildlife and on water pollution from runoff. Careful mitigation through the policies on biodiversity, green infrastructure, pollution and lighting will be needed at a more detailed design level to mitigate the risk of such impacts.

### **5.2.21 DM1 Specialist Housing**

This policy provides a presumption that specialist housing development within the local plan area will be at a suitable location and scale to meet the demand of the intended residents without negatively impacting on the character and function of an area or residential amenity. The expectation is that developments will be located in areas that are in close proximity to everyday services and connected by safe and sustainable transport routes.

### **5.2.22 DM2 Housing Mix**

This policy has a strongly positive affect on the local economy by allowing employees of different sectors to remain within or relocate to the district. This will help develop a diverse economy with a skilled workforce to maintain long-term competitiveness for employers. It will also help tackle homelessness or address those whose needs are not met by the current market within the plan area.

### **5.2.23 DM3 Housing Density**

This policy will allow an efficient use of greenfield and brownfield land. Lower density housing is encouraged at sites close to sensitive locations (i.e. National Park and AONB) which will help to reduce the impact on these areas. Higher density housing would be located close to amenities and transport links to encourage the use of sustainable transport.

### **5.2.24 DM4 Affordable Housing Exemption sites**

Exception sites provide an important role in delivering affordable housing that reflects local needs. This will help develop a diverse economy with a skilled workforce to maintain long-term competitiveness for employers. It will also help to provide housing to those whose needs are not met by the current housing market within the plan area.

### **5.2.25 DM10 New Employment Sites**

The main aim of the policy is to keep new employment sites within existing settlements and offices within the centre of Chichester. However some flexibility to meet the small scale needs of service

villages is allowed. The policy is assessed are having positive impacts for the economy but also for reducing the need to travel and for achieving a sustainable transport system. No negative effects have been identified.

#### **5.2.26 DM16 Sustainable Design and Construction**

The policy builds on the existing Policy 40 but adds new requirements for energy use and for renewable energy. These add considerable benefits in terms of minimising the use of natural resources and achieving zero net increase in greenhouse gas emissions. The policy is an important mitigation measure for the impacts of new housing and employment provision elsewhere in the plan and as such has important cumulative and synergistic benefits especially over the long term, including beyond the plan period.

#### **5.2.27 DM23 Lighting**

This policy aims to protect communities and habitats from light pollution with benefits to wildlife, in particular connectivity for wildlife such as bats. The policy aims to conserve and enhance the landscape by minimising light spill and maintaining Dark Skies in the appropriate locations which could have benefits for tourism.

#### **5.2.28 DM24 Air Quality**

The policy aims to protect communities from air pollution. It prioritises the location of development close to sustainable transport modes which allows greater access to services and facilities, minimising congestion, pollution and greenhouse gas emissions. By focussing development on well-connected locations, this could have a slightly negative impact on the rural economy as rural areas tend to be less well connected.

#### **5.2.29 DM25 Noise**

The policy protects communities from noise pollution and helps conserve the tranquillity of the landscape. However the policy also protects existing industry from being constrained by noise sensitive development, giving benefits to the local economy. However there may be a slightly negative impact on the rural economy in restricting new noise generating activities due to the impact on an environment with low background noise.

#### **5.2.30 DM26 Contaminated Land**

The policy is supportive of the remediation of contaminated land where appropriate. This will have benefits for wildlife, the use of natural resources and the landscape by facilitating the re-use of previously developed land, reducing the pressure on greenfield sites and in some cases, reusing material from the site. Remediation of the land can significantly reduce pollution on the site. The policy may result in a slight increase in greenhouse gas emissions due to the remediation processes or transport of soils on and off site.

#### **5.2.31 DM27 Historic Environment**

The policy encourages the protection, conservation and enhancement of local heritage assets and requires that development respects existing designated or natural landscapes with benefits to the landscape and wildlife. It requires the use of traditional, local materials and building techniques with

benefits to the rural economy and retaining traditional skills within the local workforce. Achieving the policy may have a slightly negative impact on housing affordability.

### 5.2.32 DM31 Trees, Hedgerows and Woodland

The aim of the policy is to protect and enhance trees, hedges and woodland with the additional benefit of protecting habitat and connectivity for wildlife, as well as conserving the landscape. Woodland and hedges can also reduce water and air pollution. The management of woodland, through coppicing and additional planting and hedge-laying will be promoted, retaining those skills within the local rural economy.

## 6. Policies with Minor Revisions

- 6.1 This is a review of the existing Local plan and not a totally new Plan. For policies in this category, changes and updates to the policy compared to the adopted Local Plan are not considered to have altered the sustainability effects that could be identified through the SA Framework. Therefore the findings of the adopted Local Plan SA can still be relied upon. These are to be found here:

<http://www.chichester.gov.uk/CHttpHandler.ashx?id=21807&p=0>

**Table 5: Policies with minor revisions**

Local Plan Review Policy	Local Plan Key Policies 2014-2029 reference	Notes on Changes
S1 Sustainable Development	Policy 1	No change
S2 Settlement Hierarchy	Policy 2	Changes to the wording of the policy, which is much reduced, but the categories of Settlement Type and the communities allocated to each type are unaltered
S6 Affordable Housing	Policy 34	Updates on vacant building credits and indistinguishability but main policy aim unchanged at 30% on sites with the same qualification criteria.
S12 Infrastructure Provision	Policy 9	Minor wording changes only
S13 Chichester City Development Principles	Policy 10	Minor changes
S14 Chichester City Transport Strategy	Policy 13	No change
S17 Thorney Island	Policy 21	More detail has been added but the policy thrust of protecting military use is maintained
S18 Integrated Coastal Zone Management for the Manhood Peninsula	Policy 22	No change
S19 North of the Plan Area	Policy 25	Minor updates

Local Plan Review Policy	Local Plan Key Policies 2014-2029 reference	Notes on Changes
S26 Natural Environment	Policy 48	Minor updates
S29 Green Infrastructure	Policy 52	Strategic element extracted from Policy 52, most of the adopted wording has been moved to DM32
AL1 Land West of Chichester	Policy 15	Very minor updates only
AL2 Land at Shopwyke	Policy 16	Very minor updates only
AL4 Land at Westhampnett/North East Chichester	Policy 17	Very minor updates only
AL15 Land at Chichester Business Park, Tangmere	Policy 19	Very minor updates only
DM5 Accommodation for Gypsies, Travellers and Travelling Show people	Policy 36	Some additions but same policy aim
DM6 Accommodation for Agricultural and other Rural Workers	Policy 37	Minor updates
DM7 Local and Community Facilities	Policy 38	Minor updates
DM8 Transport Accessibility and Parking	Policy 39	Minor updates
DM9 Existing Employment Sites	Policy 26	Minor updates
DM11 Town Centre Development	Policy 27	Minor updates
DM12 Edge and Out of Centre Retail Sites	Policy 28	Minor updates
DM13 Built Tourism and Leisure Development	Policy 30	Minor updates
DM14 Caravans and Camping Sites	Policy 31	Minor updates
DM15 Horticultural Development	Policy 32	Minor updates
DM17 Stand-alone Renewable Energy	Policy 41	Minor updates
DM18 Flood Risk and Water Management	Policy 42	Minor updates
DM19 Chichester Harbour AONB	Policy 43	Very minor revisions
DM20 Development around the Coast	Policy 44	Minor revisions, some more flexibility
DM21 Alterations in the Countryside	Policy 46	Minor revisions
DM22 Development in the Countryside	Policy 45	Minor updates

Local Plan Review Policy	Local Plan Key Policies 2014-2029 reference	Notes on Changes
DM28 Natural Environment	Policy 48	Minor updates
DM29 Biodiversity	Policy 49	Minor updates
DM30 Development and Disturbance of Birds	Policies 50 and 51	Updated but same aim of strategic mitigation
DM32 Green Infrastructure	Policy 52	Most wording carried over, some parts of Policy 52 removed to reflect new policies on Wildlife corridors and Tree, Hedges and Woodland
DM33 Canals	Policy 53	Minor revisions
DM34 Open Space, Sport and Recreation	Policy 54	Very minor revisions
DM35 Equestrian Development	Policy 55	Minor revisions, some more flexibility

## 7. Monitoring framework

- 7.1 The monitoring framework for the Sustainability Appraisal process is set out in the 'Indicators' column of the SA framework (Table 1 above). The scoping process used to select these indicators is explained fully in the SA Scoping Report dated December 2016 (<http://www.chichester.gov.uk/CHttpHandler.ashx?id=30857>). These indicators will be reported in the Annual Monitoring Report (AMR) for the Local Plan once the review is adopted. It is not intended to produce a separate SA monitoring report.
- 7.2 Should the AMR reporting process indicate that negative impacts not envisaged in this assessment are found to be occurring or conversely that positive impacts predicted in this report are not materialising, then these will form a major emphasis of the next review of the Local Plan. Should monitoring indicate that changes are required in that future review, then changes to policy and/or new policies will be introduced to mitigate any negative impacts or enhance positive impacts.
- 7.3 The SA scoping report also contains (in its Appendix 2) a more comprehensive list of baseline data sources. These will not be reported or updated in the AMR. However when the scoping report is updated ahead of the next Local Plan Review the baseline data will be updated to give a fuller picture of the sustainability impacts of the implementation of the Local Plan up to that date.

## 8. Conclusions

- 8.1 This sustainability appraisal has built upon the findings of the previous assessment of locations, through the Issues and Option stage SA (I+O).

- 8.2 A full assessment matrix process has been used to assess options for housing numbers and to assess options for the distribution of those numbers amongst the locations assessed at Issues and Options stage.
- 8.3 On the basis of the assessment for housing numbers, option 1 which provides for the delivery of 650 dwellings per annum and is the Objectively Assessed Need plus the unmet need from the Chichester District part of the South Downs National Park, is recommended as the preferred approach to take forward in the Plan Review.
- 8.4 Following the identification of the preferred approach on housing numbers (650 dpa), five different options for the spatial distribution of the housing numbers were identified. A sixth Scenario, 1A, developed from Scenario 1 and which sought to take account of deliverable land availability and reduce some of the negative impacts of Scenario 1, was added to the list of options for assessment at Preferred Approach stage.
- 8.5 On this basis of the Preferred Approach SA and taking into account other evidence and considerations, Option 1A was identified as the Preferred Option for the Local Plan Review preferred Approach consultation. The pre-existing work on Strategic Development Locations informed the production of specific policies on these locations (see Appendix).
- 8.6 Following the Preferred Approach consultation. Option 5 was dropped from the spatial distribution option being considered. It was also decided to test two new options for spatial distribution through a revised evidence base. This includes updating the SA to include assessment of these two new options. This present SA report sets out the findings at this date for members and officers to consider (see section 4.5 and 4.6) . It will then be kept updated as other policies are revised or altered in the run-up to production of a submission stage SA report in spring 2020.
- 8.6 In reviewing the existing Local Plan policies several were subject to substantial revision. In other instances, wholly new policies are recommended to be introduced. These have been subject to assessment in Section 5 above to identify the likely impacts and also to assess whether any negative impacts could be mitigated.
- 8.7 The findings of this SA report are presented in order to inform the decision maker on the impacts of options for the Local Plan Review. The SA process does not determine the plan's content but helps to inform decision makers as to the pros and cons of the options and draft policies before them.

**Appendix: Strategic Development Location Assessments updated (October 2019) from the Initial Sustainability Appraisal (May 2017)**

Page 292

Assessment Criteria		AL3 Land East of Chichester		AL5 Southern Gateway		AL6 Land South West of Chichester	
1A	<b>Does the option prevent biodiversity loss and habitat fragmentation?</b>	-	Impact on Gravel pit to the south-east of Shopwhyke is main concern. Notable birds recorded. Bat and water vole habitat through area	+	Brownfield development, preventing loss of habitat elsewhere	-	Adverse localised impact on bat and barn owl habitats to the south of the A27 junction
1B	<b>Does the option allow for movement of habitats with climate change?</b>	0	Unlikely to be significant	+	Within the existing city, so positive impact as no further disruption to existing links	0	North-south movement already blocked by the A27. However east-west movement would be impacted.
1C	<b>Does the option enhance and/or restore biodiversity opportunities and create new habitat?</b>	+	Large area so not all needed for housing -potential for enhancement on eastern edge	+	Some small scale opportunities for enhancements	+	The site is a large area so it is not all required for development -potential for wetland habitat creation around the Lavant
2A	<b>Does the option protect water resources?</b>	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific depends on overall housing numbers
2B	<b>Does the option maximise use of waste resources?</b>	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific depends on overall housing numbers

Assessment Criteria		AL3 Land East of Chichester		AL5 Southern Gateway		AL6 Land South West of Chichester	
2C	Does the option make efficient use of energy?	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development
3A	Does the option reduce air pollution from industrial processes and transport?	-	Additional pressure on A27	0	Uncertain impact, risk of increasing car use in a congested area, on the other hand housing close to the centre would reduce car use to mitigate this	-	Would put additional pressure on the A27
3B	Will the option assist the remediation of contaminated land?	+	Opportunity to develop on land previously used for mineral extraction but no remediation required	+	May not be contaminated, but existing land will be re-used	0	Not contaminated land
3C	Does the option reduce levels of water pollution?	-	Medium risk of runoff to former gravel pit	-	Risk of runoff to the canal SNCI	-	High risk of runoff going into the Harbour SPA via the Lavant, which flows through the site
3D	Does the option require new waste water treatment capacity?	+	Connects to Tangmere. Additional capacity would be required to support a strategic development, however there are no environmental restrictions	+	Re-development would have to demonstrate no net increase in waste water flows compared to existing uses	--	Would have to connect to Apuldram, where there is very limited headroom and limited ability to expand capacity due to nitrogen constraints
4A	Does the option maximise the use of renewable and low carbon energy sources?	+	Large site with potential for district heating and low or zero carbon (LZC) technologies within the site	0	No significant effect	+	Large site with potential for district heating and LZC technologies within the site

Assessment Criteria		AL3 Land East of Chichester		AL5 Southern Gateway		AL6 Land South West of Chichester	
4B	Does the option reduce the need to travel?	+	Closest in relative terms to City Centre but depends upon the ease of connection(s) to Chichester	++	Location is very close to shops, jobs, schools and other facilities	0	Overall neutral. Fairly close to Chichester but the A27 presents a barrier to movement on foot or by cycle
5A	Does the option reduce the risks of coastal, fluvial surface water and groundwater flooding?	0	Overall neutral - some additional runoff but can be dealt with on-site and no downstream impacts	-	Partially within flood zones 2 and 3	0	Overall neutral - flood zones within the location constrain the developable area, but a reasonable area for the amount of development proposed is obtainable outside these.
5B	Does the option increase the use of SUDS and provide opportunities for restoring natural function to rivers and coastal systems?	+	Land available for deploying full range of SUDS techniques	-	Maybe difficult to fit into an existing urban area where surface water sewers are available	+	Flood zones constrain the developable area, but a reasonable area is outside these.
6A	Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?	+	Increases viability of a bus route through Shopwhyke lakes	++	Very close to train station, bus station and cycle routes	+	Land available for deploying full range of SUDS techniques
6B	Does the option improve networks for cyclists and pedestrians?	++	Closer to city centre compared to other options but making good links may be difficult due to the A27. New footbridge from Shopwhyke will provide links to shops	+	Networks already good in this area, but some improvement could be secured through re-development	0	Close to good bus route but an awkward distance from train stations

Assessment Criteria		AL3 Land East of Chichester		AL5 Southern Gateway		AL6 Land South West of Chichester	
6C	Does the option reduce congestion?	-	Will add to congestion on the A27	0	Overall neutral - this is a congested area so additional car use is a risk, but residents also have opportunities to walk, cycle and use public transport.	-	Improvements would be needed to overcome the barrier of the A27 and mitigate this negative assessment
7A	Does the option encourage sustainable land management practices to conserve landscapes?	+	One of the less sensitive options in landscape terms	++	Brownfield site within existing urban area	-	Will add to congestion on the A27
7B	Does the option ensure protection of traditional urban forms?	0	Edge of centre suburban development. Does not relate to the existing settlement along Oving Road but would create a new quarter of Chichester in conjunction with Shopwhyke Lakes SDL	0	A sensitive site in terms of townscape, the impact will depend on the height, bulk and design of any re-development	-	Potential to adversely affect views in and around the Harbour AONB
7C	Does the option ensure conservation and enhancement of the historic environment, heritage assets and their settings?	0	Few if any heritage assets in the area, but archaeology may be present in areas not used for mineral extraction	-	Uncertain impact - requires archaeological investigation. Few listed buildings, but some buildings worthy of retention	-	Edge of centre suburban development. Does not relate to the existing settlement
8A	Does the option meet local housing needs?	++	Plenty of land available at this location to meet district and sub-regional housing needs	+	Depends on the density of re-development, but will help meet housing needs of the city	+	Few if any heritage assets in the area, but archaeology may be present

Assessment Criteria		AL3 Land East of Chichester		AL5 Southern Gateway		AL6 Land South West of Chichester	
8B	<b>Does the option provide the right housing mix of size and tenure and the continuation of a sustainable mix of people within communities?</b>	++	Strategic development should be able to deliver a wide mix of size and tenure	+	Likely to include flats as well as houses and a mix of tenure	0	Physical restrictions mean that only a small amount of housing can be delivered here compared to other strategic locations
9	<b>Does the option provide access to services and facilities?</b>	+	No existing facilities nearby this location would rely on good links to existing facilities in the City. Already allocated development will provide local facilities	++	Ideally located option	-	No existing facilities nearby this location would rely on good links to existing facilities in the City, which may be difficult to achieve
10A	<b>Does the option ensure that economic opportunities are accessible to all?</b>	++	Close to Chichester City and the A27	++	Close to economic opportunities of the city and also close to the A27	-	No existing facilities nearby this location would rely on good links to existing facilities in the City, which may be difficult to achieve
10B	<b>Does the option ensure that value added is retained in the District?</b>	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Supports the economy of the city, particularly if some mixed use is incorporated	+	Close to city centre and the A27
11A	<b>Does the option encourage innovation?</b>	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Supports the attracting of skilled workers into Chichester, by offering location close to facilities, shops schools etc.	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs

Assessment Criteria		AL3 Land East of Chichester		AL5 Southern Gateway		AL6 Land South West of Chichester	
11B	<b>Does the option develop knowledge based economy locally?</b>	++	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Supports the economy of the city, particularly if some mixed use is incorporated	+	Supports the economy of the city, particularly if some mixed use is incorporated
12A	<b>Does the option ensure skills are enhanced to increase access to work?</b>	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Location close to the university and college	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs
12B	<b>Does the option ensure a skilled workforce is available locally to allow business development?</b>	+	Will provide housing to support employers' needs over a wide area of West Sussex and so help provide and retain a skilled workforce	++	Supports the attracting of skilled workers into Chichester, by offering location close to facilities, shops schools etc.	0	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs, but this site delivers only a limited amount of that required housing
13A	<b>Does the option promote a prosperous and diverse rural economy?</b>	0	No significant effect	0	City development so no significant impact	-	Would develop on good quality agricultural land, this could negatively impact rural economy
13B	<b>Does the option avoid the loss of the Best and Most Versatile agricultural land?</b>	0	Opportunity to develop on land previously used for mineral extraction	++	Brownfield re-development so avoids losses of BMV land elsewhere	--	Grade 1 and 2 agricultural land (Excellent to very good)

Assessment Criteria		AL7 Highgrove Farm, Bosham		AL8 East Wittering Parish		AL9 Fishbourne Parish	
1A	Does the option prevent biodiversity loss and habitat fragmentation?	-	Bat Habitat along railway and water vole habitat in the east and norther west of original settlement. Otherwise farmland with limited constraint	--	Water vole and Barn owl records from the ditch networks to the north. Area to the east very close to Medmerry and the fields to the west sustain wading birds	-	Some evidence of bat movement network across the site but largely open farmland with few constraints
1B	Does the option allow for movement of habitats with climate change?	0	Train line, A259 and A27 provide existing constraints. A Strategic development is unlikely to make the situation worse	-	Could cause habitat fragmentation by developing adjoining habitat to Medmerry and impacting on corridors/stepping stones used by protected species	0	Existing railway line provides a constraint here - development is unlikely to make the situation worse
1C	Does the option enhance and/or restore biodiversity opportunities and create new habitat?	+	Limited hedgerow coverage - opportunity to improve GI	+	Some potential for ditch and rife corridor enhancements within larger site or sites	+	Some potential for ditch and rife corridor enhancements within larger site or sites
2A	Does the option protect water resources?	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development
2B	Does the option maximise use of waste resources?	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development
2C	Does the option make efficient use of energy?	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development

Assessment Criteria		AL7 Highgrove Farm, Bosham		AL8 East Wittering Parish		AL9 Fishbourne Parish	
3A	Does the option reduce air pollution from industrial processes and transport?	-	Additional pressure on A259 and backroads. Impact will increase with house numbers	-	Without major improvement on the A27 large scale development here will exacerbate existing problems at the Stockbridge roundabout where the A286 links in	-	Additional pressure on A27 via the A259 Fishbourne Road (west)
3B	Will the option assist the remediation of contaminated land?	0	N/A not PDL	0	N/A not PDL	0	N/A not PDL
3C	Does the option reduce levels of water pollution?	0	Main river line in the east of the settlement. Small risk of runoff to the river	-	Waterways run through the settlement to the sea - these are the most likely route for runoff	0	No significant impact
3D	Does the option require new waste water treatment capacity?	--	Would connect to Bosham - headroom of 400 houses. Would not accommodate a strategic development. Potential impact to Chichester Harbour	+	Connects to Sidlesham WWTW. Head room here approx. 800 dwellings but not in combination with S5 - Selsey	--	Mostly likely sent to Apuldram or Bosham - limited capacity at 216 or 400 households, respectively. Potential impact to Chichester Harbour
4A	Does the option maximise the use of renewable and low carbon energy sources?	+	Large area with potential for low or zero carbon technologies to be fully incorporated within it	+	Large area with potential for low or zero carbon technologies to be fully incorporated within it	+	Large area with potential for low or zero carbon technologies to be fully incorporated within it

Assessment Criteria		AL7 Highgrove Farm, Bosham		AL8 East Wittering Parish		AL9 Fishbourne Parish	
4B	Does the option reduce the need to travel?	-	There is a bus and train service present, however distance to the city means that car travel is more likely. Development here would add to increased commuter journeys on A259/A27 and also the need to travel for facilities in Havant or Chichester	--	Strategic development would be on a scale to meet needs across the district and beyond. Inevitably development on the south of the Manhood would add to increased commuter journeys and also need to travel for the facilities of Chichester City that are not available elsewhere	0	Train station within Fishbourne. Strategic development would be on a scale to meet needs across the district and beyond. Inevitably development here would add increased commuter journeys on A259/A27 and also the need to travel for facilities in Chichester city centre
5A	Does the option reduce the risks of coastal, fluvial surface water and groundwater flooding?	0	Flood zones north east of Broadbridge along main river lines. These can be easily avoided if development remains on eastern side of Ratham Lane (B2146)	-	Flood zones to the east and the north of the existing settlement, although the latter are avoidable	-	Flood zones to the south of the A259. Runoff from large develop may exacerbate flooding risk
5B	Does the option increase the use of SUDS and provide opportunities for restoring natural function to rivers and coastal systems?	+	Land available for deploying full range of SUDS techniques	+	Land available for deploying full range of SUDS techniques	+	Land available for deploying full range of SUDS techniques
6A	Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?	+	Bus and train service. However, car travel is more likely owing from distance to the city	-	There is a good bus service but this is restricted by the access across the A27. No train service. Car travel more likely	+	Potential to extend bus service and build access to Fishbourne Train Station

Assessment Criteria		AL7 Highgrove Farm, Bosham		AL8 East Wittering Parish		AL9 Fishbourne Parish	
6B	<b>Does the option improve networks for cyclists and pedestrians?</b>	-	Limited opportunity for existing links to be extended or improved. Distance from amenities means that cycling walking is unlikely	0	Potential to improve local links to East Head and Medmerry, but longer distance links would require an off-road route to be identified	+	Opportunity to improve cycle networks - best option is through Fishbourne (Roman Way - A259 - A27 underpass)
6C	<b>Does the option reduce congestion?</b>	-	Increased congestion on the A259	-	Will add congestion to the A27 and potentially city centre via Stockbridge roundabout	-	Will add congestion to A27 via A259 Fishbourne Road (West)
7A	<b>Does the option encourage sustainable land management practices to conserve landscapes?</b>	-	Development to the North and East of Bosham will link in with the existing development and current planning application. However, local impact will be significant.	-	Local impact significant but unlikely to affect the AONB	-	Local impact is likely to be significant
7B	<b>Does the option ensure protection of traditional urban forms?</b>	--	The scale of the development will completely alter the existing development. There would be significant impact to the existing historic village	-	The scale of the development will completely alter the existing development. There would be significant impact to the existing historic village	--	The scale of the development will completely alter the existing development. There would be significant impact to the existing historic village

Assessment Criteria		AL7 Highgrove Farm, Bosham		AL8 East Wittering Parish		AL9 Fishbourne Parish	
7C	Does the option ensure conservation and enhancement of the historic environment, heritage assets and their settings?	+	No heritage assets in the area, however archaeology may be present	0	Few if any heritage assets but archaeology may be present	0	Fishbourne is a historic site and had significant heritage assets. Archaeology may be present
8A	Does the option meet local housing needs?	++	Plenty of land available at this location to meet district and sub-regional housing needs	+	Land availability slightly more restricted at this location but would still be able to deliver a fair proportion of the district's needs	++	Plenty of land available at this location to meet district and sub-regional housing needs
8B	Does the option provide the right housing mix of size and tenure and the continuation of a sustainable mix of people within communities?	++	A strategic development would be able to deliver a mix of size and tenure	++	Strategic development should be able to deliver a wide mix of size and tenure	++	A strategic development would be able to deliver a mix of size and tenure
9	Does the option provide access to services and facilities?	0	Some local shops but access to secondary school, hospital and further education worse than some other options.	-	Some local shops but access to secondary school, hospital and further education worse than some other options as settlement would be greater distance away from these amenities	+	Some local shops and primary schools close. Access to secondary schools, hospital and further education would be in City Centre
10A	Does the option ensure that economic opportunities are accessible to all?	++	Further from the A27 and the city but still a positive contribution to the local economy	+	Further from the A27 and the city but still a positive contribution to the local economy	++	Close to city centre and A27

Assessment Criteria		AL7 Highgrove Farm, Bosham		AL8 East Wittering Parish		AL9 Fishbourne Parish	
10B	<b>Does the option ensure that value added is retained in the District?</b>	+	Housing around Chichester District is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Further from the A27 and the city but still likely to support local economic development. Location means that residents are unlikely to commute out of the district	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs
11A	<b>Does the option encourage innovation?</b>	+	Housing around Chichester District is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	0	Less likely than city based locations to support businesses of this type relocating to the Manhood Peninsula	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs
11B	<b>Does the option develop knowledge based economy locally?</b>	+	New business developments in Bosham (hospice and agricultural distribution building planning apps). A larger strategic development may attract further business development	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs
12A	<b>Does the option ensure skills are enhanced to increase access to work?</b>	+	Housing around Chichester District is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs

Assessment Criteria		AL7 Highgrove Farm, Bosham		AL8 East Wittering Parish		AL9 Fishbourne Parish	
12B	<b>Does the option ensure a skilled workforce is available locally to allow business development?</b>	+	Housing around Chichester District is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	0	Problems with access limits attractiveness to skilled workforce	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs
13A	<b>Does the option promote a prosperous and diverse rural economy?</b>	-	Would develop on good quality agricultural land, this could negatively impact rural economy	0	No significant effect	-	Would develop on good quality agricultural land, this could negatively impact rural economy
13B	<b>Does the option avoid the loss of the Best and Most Versatile agricultural land?</b>	--	Grade 1 and 2 agricultural land (Excellent to very good)	+	Compared to other options this is likely to be development on Grade 3 land but going too far north would encroach on Grade 2 land	-	This section of land appears to be Grade 2 (good)

Assessment Criteria		AL10 Chidham and Hambrook Parish		AL11 Hunston Parish		AL12 Selsey	
1A	<b>Does the option prevent biodiversity loss and habitat fragmentation?</b>	-	Hedgerows around site provide an important bat movement network but largely open farmland with few constraints	--	Within the zone of influence for Pagham and Chichester Harbour. Close to the Canal and Hunston Copse SNCIs. Potential impact on components of ecological networks	--	Development would cause disturbance Pagham Harbour Special Protection Area. Fields North West towards Church Norton sustain breeding wading birds
1B	<b>Does the option allow for movement of habitats with climate change?</b>	0	Overall neutral if the provided the hedgerow corridors are conserved	-	Could impact on wildlife corridor used by protected species. However, opportunities for enhancements to improve connectivity	-	Could cause habitat fragmentation by developing adjoining habitat to Pagham Harbour and impacting on wildlife corridors used by protected species
1C	<b>Does the option enhance and/or restore biodiversity opportunities and create new habitat?</b>	+	Large area so not all needed for housing - potential for enhancement of green infrastructure	+	Opportunities for strengthening Green Infrastructure linked to new development	+	There is the potential to enhance Pagham Harbour SPA
2A	<b>Does the option protect water resources?</b>	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development
2B	<b>Does the option maximise use of waste resources?</b>	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development

Assessment Criteria		AL10 Chidham and Hambrook Parish		AL11 Hunston Parish		AL12 Selsey	
2C	<b>Does the option make efficient use of energy?</b>	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development
3A	<b>Does the option reduce air pollution from industrial processes and transport?</b>	-	Additional pressure on A27 via the A259 Fishbourne Road (west) and back roads (Clay Lane - Fishbourne Road East) for the most direct routes to the CC	-	Added congestion on the A27 likely to have negative impact on air quality	-	Likely to increase pressure on the B2145 and ultimately the A27, however Selsey has its own shops and facilities for everyday use
3B	<b>Will the option assist the remediation of contaminated land?</b>	0	N/A not PDL	0	Small area of potentially contaminated land on NE side of Hunston and land to north of B2140 within influence of closed landfill	0	West and south-west of Selsey - small areas of potentially contaminated land that could be remediated
3C	<b>Does the option reduce levels of water pollution?</b>	-	If development occurs west of Nutbourne there will be potential runoff to Thorney Channel	0	Sites are outside the groundwater protection zones but potential for discharges into Chichester Canal and Bremere Rife	0	Sites are outside the groundwater protection zones and there are no watercourses
3D	<b>Does the option require new waste water treatment capacity?</b>	-	Connects to Bosham - capacity of 400 households. Potential to further impact Chichester Harbour	-	Negative impact until WWTW is upgraded or new capacity is found	+	Connects to Sidlesham WWTW. Head room here approx. 800 dwellings but not in combination with S4 - East Wittering / Bracklesham

Assessment Criteria		AL10 Chidham and Hambrook Parish		AL11 Hunston Parish		AL12 Selsey	
4A	<b>Does the option maximise the use of renewable and low carbon energy sources?</b>	+	Large area with potential for low or zero carbon technologies to be fully incorporated within it	+	Opportunities for on-site low carbon technologies	+	Large area with potential for low or zero carbon technologies to be fully incorporated within it
4B	<b>Does the option reduce the need to travel?</b>	-	There is access to Nutbourne train station. It is too far to cycle/walk to Chichester city centre. Development here would add to increased commuter journeys on A259 and also the need to travel for facilities in the city centre	+	New facilities could reduce need to travel in to the city centre	--	Strategic development would be on a scale to meet needs across the district and beyond. Inevitably development on the south of the Manhood would add to increased commuter journeys and also need to travel for the facilities of Chichester City that are not available elsewhere
5A	<b>Does the option reduce the risks of coastal, fluvial surface water and groundwater flooding?</b>	-	Flood zones to the west of the site. Development on the west of Nutbourne could increase runoff to the Thorney Channel	-	Sites to the South East of Hunston likely to increase flood risk and other potential sites located close to flood-zones	-	Selsey is low lying and has drainage problems. There are large flood zones along the coast and Broad Rife. These are avoidable if the eastern side of Selsey is developed towards Church Norton
5B	<b>Does the option increase the use of SUDS and provide opportunities for restoring natural function to rivers and coastal systems?</b>	+	Land available for deploying full range of SUDS techniques	+	Land available for deploying full range of SUDS techniques	+	Land available for deploying full range of SUDS techniques

Assessment Criteria		AL10 Chidham and Hambrook Parish		AL11 Hunston Parish		AL12 Selsey	
6A	Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?	+	Already a train station and largescale development might increase service	0	No train station but served by bus links which may improve with further development	-	Potential for improved bus services, walking/cycling routes, however access will be restricted by the A27. No train service. Car travel more likely
6B	Does the option improve networks for cyclists and pedestrians?	-	Potential to improve links to Emsworth and Bosham but city links would be too long and difficult	+	May help bring forward WSCC proposed cycle route	+	For larger developments, could increase likelihood of the proposed Chichester to Selsey Cycle Route being implemented
6C	Does the option reduce congestion?	-	Will add congestion to the A259 and A27 at Warblington and Fishbourne	-	Likely to add to congestion on A27	-	Larger development at Selsey still likely to increase pressure on B2145
7A	Does the option encourage sustainable land management practices to conserve landscapes?	-	Local impact is likely to be significant	-	Local impact is likely to be significant	--	Larger development likely to impact on Pagham Harbour and Church Norton
7B	Does the option ensure protection of traditional urban forms?	--	The scale of the development will completely alter the existing development. There would be significant impact to the existing historic village	-	Negative impact on village form	-	Negative impact as would expand an already overdeveloped area from its historic village form

Assessment Criteria		AL10 Chidham and Hambrook Parish		AL11 Hunston Parish		AL12 Selsey	
7C	Does the option ensure conservation and enhancement of the historic environment, heritage assets and their settings?	0	No heritage assets and archaeological priority areas, but archaeology likely be present	-	Potential negative impact on the Archaeological Priority Area	0	Unlikely to impact on heritage assets but archaeology may be present
8A	Does the option meet local housing needs?	+	Land availability slightly more restricted at this location but would still be able to deliver a fair proportion of the district's needs	+	Helps meet the local housing need	+	Land availability slightly more restricted at this location but would still be able to deliver a fair proportion of the district's needs
8B	Does the option provide the right housing mix of size and tenure and the continuation of a sustainable mix of people within communities?	++	A strategic development would be able to deliver a mix of size and tenure	+	Opportunity to provide a mix of tenure	++	Strategic development should be able to deliver a wide mix of size and tenure
9	Does the option provide access to services and facilities?	0	Some local shops but access to secondary school, hospital and further education worse than some other options	+	Development likely to increase access to services locally	+	Good access to existing local facilities (including secondary education) but still a need to access Chichester for major facilities
10A	Does the option ensure that economic opportunities are accessible to all?	+	Further from the A27 and the city but still a positive contribution to the local economy	+	Potential for increased opportunities locally but also reasonably easy access to City Centre	+	Increase in some opportunities locally but also problems accessing Chichester for greater opportunities

Assessment Criteria		AL10 Chidham and Hambrook Parish		AL11 Hunston Parish		AL12 Selsey	
10B	<b>Does the option ensure that value added is retained in the District?</b>	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Significant development here, relatively close to the City Centre, is likely to bring economic benefits to the District	+	Further from the A27 and the city but still likely to support local economic development. Location means that residents are unlikely to commute out of the district
11A	<b>Does the option encourage innovation?</b>	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	0	Less likely than city based locations to support businesses of this type relocating to the Manhood Peninsula
11B	<b>Does the option develop knowledge based economy locally?</b>	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs
12A	<b>Does the option ensure skills are enhanced to increase access to work?</b>	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs

Assessment Criteria		AL10 Chidham and Hambrook Parish		AL11 Hunston Parish		AL12 Selsey	
12B	<b>Does the option ensure a skilled workforce is available locally to allow business development?</b>	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Housing around Chichester city is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	0	Problems with access limits attractiveness to skilled workforce
13A	<b>Does the option promote a prosperous and diverse rural economy?</b>	-	Would develop on good quality agricultural land, this could negatively impact rural economy	+	Provide housing to support the rural workforce	++	Development could support the agricultural and horticultural businesses. Close to the Horticultural Development Areas in Sidlesham
13B	<b>Does the option avoid the loss of the Best and Most Versatile agricultural land?</b>	--	Grade 1 and Grade 2 (Excellent to Very Good)	-	Potential loss of Grade 2 agricultural land. However, some options for developing Grade 3 land	-	Potential loss of Grade 1 and Grade 2 agricultural land

Assessment Criteria		AL13 Southbourne Parish		AL14 Land West of Tangmere	
1A	Does the option prevent biodiversity loss and habitat fragmentation?	-	Some bird species of note recorded, Barn Owl habitat and bat movement network on site but largely open farmland with few constraints	-	Bird species of note recorded in fields surrounding existing development and bat movement network present along hedgerows
1B	Does the option allow for movement of habitats with climate change?	-	Impact on existing corridors and potential future migration unless the Green Ring proposal is implemented	0	Unlikely to be significant
1C	Does the option enhance and/or restore biodiversity opportunities and create new habitat?	+	Limited tree and hedgerow coverage - opportunity to create habitat	+	Opportunity to improve and build upon bat movement network by installing and improving hedgerows within the site
2A	Does the option protect water resources?	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development
2B	Does the option maximise use of waste resources?	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development
2C	Does the option make efficient use of energy?	0	Not location specific - depends on the design and specification of the development	0	Not location specific - depends on the design and specification of the development

Assessment Criteria		AL13 Southbourne Parish		AL14 Land West of Tangmere	
3A	Does the option reduce air pollution from industrial processes and transport?	-	Additional pressure on A259, backroads and A27. Impact will increase with house numbers.	-	Additional pressure on A27 and backroads. Impact will increase with large scale development
3B	Will the option assist the remediation of contaminated land?	0	N/A not PDL.	0	N/A not PDL. Previous military land, however this falls within the Horticultural Development Area
3C	Does the option reduce levels of water pollution?	-	Ditch system west of site feeds in to Southbourne Channel - possible for runoff to increase pollution levels with a larger strategic development	0	No significant affect
3D	Does the option require new waste water treatment capacity?	+	Connects to Thornham (capacity of 1615). However, risk on in combination effect with Havant Borough	+	Connects to Tangmere. Additional capacity would be required to support a strategic development, however there are no environmental restrictions
4A	Does the option maximise the use of renewable and low carbon energy sources?	+	Large area with potential for low or zero carbon technologies to be fully incorporated within it	+	Large area with potential for low or zero carbon technologies to be fully incorporated within it
4B	Does the option reduce the need to travel?	-	Access could be gained to Southbourne train station. It is too far to easily cycle/walk to Chichester or Havant. Strategic development here would add to increased commuter journeys on A259/A27 and also the need to travel for facilities in Havant or Chichester city centre	0	Closer to Chichester City Centre than other options. Possibility of cycle route to city. Strategic development here would add to increased commuter journeys on A27 and also the need to travel for facilities in Chichester city centre

Assessment Criteria		AL13 Southbourne Parish		AL14 Land West of Tangmere	
5A	Does the option reduce the risks of coastal, fluvial surface water and groundwater flooding?	0	No significant impact - no flooding risk on land	0	No significant impact, No flooding risk on land
5B	Does the option increase the use of SUDS and provide opportunities for restoring natural function to rivers and coastal systems?	+	Land available for deploying full range of SUDS techniques	+	Land available for deploying full range of SUDS techniques
6A	Does the option achieve modal shift to more sustainable forms of transport, integrating bus and train networks?	+	There are good bus links and train station. However, greater distance from Chichester or Havant means that car travel is more likely	-	Use of existing bus links. Opportunity to develop cycle path to Chi CC. However, distance/journey times might deter users.
6B	Does the option improve networks for cyclists and pedestrians?	+	Approximate 1.5 miles to Emsworth. Opportunity to build a link the towns and boost recreational tourism	-	Relatively closer to Chichester city than other options. Opportunity to develop cycle path to city. Access to Shopwhyke park green space. However, distance might deter users
6C	Does the option reduce congestion?	-	Will add congestion to A259 and A27	-	Added congestion to A27. Access to A27 from Tangmere/Shopwyke Rd or through Tangmere on Meadow Way
7A	Does the option encourage sustainable land management practices to conserve landscapes?	-	Urbanisation of the landscape. Local impact is likely to be significant	-	Further urbanisation of Tangmere may impact on views to the cathedral spire and to and from the South Downs National Park. Local impact is likely to be significant

Assessment Criteria		AL13 Southbourne Parish		AL14 Land West of Tangmere	
7B	Does the option ensure protection of traditional urban forms?	-	Potential for continuous strip of development along the A259. Residents might lose a sense of place as the boundaries of the developments will be close together	-	Negative impact, further strategic development would expand from its historic village form. Potential for further development to encroach on Oving. Residents might lose a sense of place as the boundaries of the developments will be close together
7C	Does the option ensure conservation and enhancement of the historic environment, heritage assets and their settings?	+	Positive provided AONB and Prinsted Conservation Area are avoided. Archaeology may be present	-	Archaeological priority areas within the area. Archaeology may be present. Tangmere Conservation Area may be impacted
8A	Does the option meet local housing needs?	++	Plenty of land available at this location to meet district and sub-regional housing needs	++	Plenty of land available at this location to meet district and sub-regional housing needs
8B	Does the option provide the right housing mix of size and tenure and the continuation of a sustainable mix of people within communities?	++	A strategic development would be able to deliver a mix of size and tenure	++	A strategic development would be able to deliver a mix of size and tenure
9	Does the option provide access to services and facilities?	+	Both Primary and Secondary schools but other amenities are limited. Would need to travel for higher education, hospital and larger amenities	+	Some amenities within Tangmere including primary school. Would need to travel to Chichester for further amenities. Already allocated development will bring further amenities. Another strategic development will require an additional primary school

Assessment Criteria		AL13 Southbourne Parish		AL14 Land West of Tangmere	
10A	Does the option ensure that economic opportunities are accessible to all?	++	Further from the A27 and the city but still a positive contribution to the local economy	++	Close to city centre and the A27
10B	Does the option ensure that value added is retained in the District?	+	Housing around Chichester District is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs	+	Housing around Chichester District is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs
11A	Does the option encourage innovation?	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Housing around Chichester District is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs
11B	Does the option develop knowledge based economy locally?	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	++	Tangmere has its own economic base and good access to the A27 - potential to build on existing employment opportunities
12A	Does the option ensure skills are enhanced to increase access to work?	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Housing around Chichester District is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs
12B	Does the option ensure a skilled workforce is available locally to allow business development?	+	Further from the A27 and the city but is still likely to support local economic development and the creation and retention of skilled high-value jobs	+	Housing around Chichester District is likely to support local economic development aims for the creation and retention of highly skilled high-value jobs

Assessment Criteria		AL13 Southbourne Parish		AL14 Land West of Tangmere	
13A	Does the option promote a prosperous and diverse rural economy?	0	No significant effect	++	Development could support the agricultural businesses. Close to the Horticultural Development Area (HDA) in Tangmere. Propose do not build on HDA.
13B	Does the option avoid the loss of the Best and Most Versatile agricultural land?	-	Strips of Grade 1 - 3 land	-	Strips of Grade 1 - 3 land (excellent to good)