

Public Document Pack

JOHN WARD

Director of Corporate Services

Contact: Lisa Higenbottam on 01243 534684
Email: lhigenbottam@chichester.gov.uk

East Pallant House
1 East Pallant
Chichester
West Sussex
PO19 1TY
Tel: 01243 785166
www.chichester.gov.uk



A meeting of the **Cabinet** will be held in Virtual on **Tuesday 4 May 2021** at **9.30 am**

MEMBERS: Mrs E Lintill (Chairman), Mrs S Taylor (Vice-Chairman), Mr R Briscoe, Mr A Dignum, Mrs P Plant, Mr A Sutton and Mr P Wilding

AGENDA

- 1 **Chair's Announcements**
The Chair will make any specific announcements for this meeting and advise of any late items which due to special circumstances will be given urgent consideration under Late Items.
- 2 **Approval of Minutes**
The Cabinet is requested to approve as a correct record the minutes of its meeting on Tuesday 6 April 2021.
- 3 **Declarations of Interests**
Members are requested to make any declarations of disclosable pecuniary, personal and/or prejudicial interests they might have in respect of matters on the agenda for this meeting.
- 4 **Public Question Time**
In accordance with Chichester District Council's scheme for public question time as amended by Full Council on 24 September 2019 the Cabinet will receive any questions which have been submitted by members of the public in writing by noon two working days before the meeting. Each questioner will be given up to three minutes to ask their question. The total time allocated for public question time is 15 minutes subject to the Chairman's discretion to extend that period.

RECOMMENDATIONS TO COUNCIL

None.

KEY DECISIONS

- 5 **Draft revised Air Quality Action Plan (Pages 1 - 64)**
The Cabinet is requested to consider the report and its appendix and make the following resolution:

That the revised Air Quality Action Plan be approved for public consultation.

6 **Review of the Allocation Scheme for Social and Affordable Housing** (Pages 65 - 101)

The Cabinet is requested to consider the report and its appendices and make the following resolutions:

1. That the Allocation Scheme for Social and Affordable Housing as set out in Appendix 2 be approved.
2. That the Cabinet authorises the Director for Housing and Communities, following consultation with the Cabinet Member for Housing, to make minor changes to the scheme in response to statutory requirements or as otherwise required to maintain operational effectiveness.
3. That Officers undertake a further review of the Rural Parish Connection and bring forward proposals for further changes if considered necessary.

7 **Westbourne Neighbourhood Plan Decision Statement** (Pages 103 - 128)

The Cabinet is requested to consider the report and its appendix and make the following resolutions:

1. That the Decision Statement as set out in the appendix be published.
2. To approve the examiner's recommendation that the Neighbourhood Development Plan proceed to referendum, subject to modifications as set out in the Decision Statement.

OTHER DECISIONS

8 **Urgent Decision Notice** (Pages 129 - 130)

The Cabinet is requested to note the Urgent Decision Notice relating to the Welcome Back Fund.

9 **Late Items**

- a) Items added to the agenda papers and made available for public inspection
- b) Items which the Chair has agreed should be taken as matters of urgency by reason of special circumstances to be reported at the meeting

10 **Exclusion of the Press and Public**

The Cabinet is asked to consider in respect of agenda item 11 whether the public including the press should be excluded from the meeting on the following ground of exemption in Schedule 12A to the *Local Government Act 1972* namely Paragraph 3 (Information relating to the financial or business affairs of any particular person (including the authority holding that information)) and because, in all the circumstances of the case, the public interest in maintaining the exemption of that information outweighs the public interest in disclosing the information.

[Note The report and its appendices within this part of the agenda are attached for members of the Council and relevant only (printed on salmon paper)]

- 11 **Recommendations from the Overview and Scrutiny Committee** (Page 131)
The Cabinet is requested to consider and provide comment on the Overview and Scrutiny Committee recommendations relating to Southern Gateway.

NOTES

- (1) The press and public may be excluded from the meeting during any item of business wherever it is likely that there would be disclosure of 'exempt information' as defined in section 100A of and Schedule 12A to the Local Government Act 1972.
- (2) The press and public may view the report appendices which are not included with their copy of the agenda on the Council's website at [Chichester District Council - Minutes, agendas and reports](#) unless they contain exempt information.
- (3) A key decision means an executive decision which is likely to:
 - result in Chichester District Council (CDC) incurring expenditure which is, or the making of savings which are, significant having regard to the CDC's budget for the service or function to which the decision relates or
 - be significant in terms of its effect on communities living or working in an area comprising one or more wards in the CDC's area or
 - incur expenditure, generate income, or produce savings greater than £100,000

NON-CABINET MEMBER COUNCILLORS SPEAKING AT THE CABINET

Standing Order 22.3 of Chichester District Council's Constitution provides that members of the Council may, with the Chairman's consent, speak at a committee meeting of which they are not a member, or temporarily sit and speak at the committee table on a particular item but shall then return to the public seating area.

The Leader of the Council intends to apply this standing order at Cabinet meetings by requesting that members should *normally* seek the Chairman's consent in writing by email in advance of the meeting. They should do this by noon on the Friday before the Cabinet meeting, outlining the substance of the matter that they wish to raise. The word normally is emphasised because there may be unforeseen circumstances where a member can assist the conduct of business by his or her contribution and where the Chairman would therefore retain their discretion to allow the contribution without the aforesaid notice.

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Chichester District Council

CABINET

4 May 2021

Draft revised Air Quality Action Plan

1. Contacts

Report Author:

Simon Ballard, Environmental Protection Manager,
Tel: 01243 534694 E-mail: sballard@chichester.gov.uk

Cabinet Member:

Penny Plant, Cabinet Member for Environment and Chichester Contract Services,
Tel: 01243 514034 E-mail: pplant@chichester.gov.uk

2. Recommendation

- 2.1. **That Cabinet approves the revised Air Quality Action Plan for public consultation.**

3. Background

- 3.1. Chichester District Council declared by order four Air Quality Management Areas (AQMA) (in 2006, 2007 and 2020). These AQMAs were declared where air quality fails or is likely to fail an Air Quality Objective for Nitrogen Dioxide (NO₂) prescribed in Regulations. The AQMAs are located in parts of St Pancras, Orchard Street, Stockbridge A27 roundabout and Rumbold's Hill, Midhurst. When an AQMA is declared then adopting an Air Quality Action Plan (AQAP) is a legal requirement. The AQAP must propose actions aimed at driving local air quality towards compliance with the relevant air quality objective of 40µgm⁻³ of NO₂ measured as an annual mean.
- 3.2. The statutory guidance suggests that AQAPs should be renewed every five years and the revised AQAP 2021 follows the two previous AQAPs from 2008 and 2015 which were also subject to public consultation.
- 3.3. The previous AQAPs have been focused on Chichester as at that time there were only AQMAs declared in Chichester. In January 2020 the Council declared the Rumbolds Hill, Midhurst AQMA and so the revised AQAP now includes Midhurst.
- 3.4. Actions within AQAPs are generally unfunded at the outset but adoption of the plan enables bidding for grants to deliver air quality actions. Under the previous AQAPs projects delivered using grant monies include the Co-Wheels car club in Chichester, doubling the number of bike racks in Chichester City Centre, delivering policy for the integration of electric

vehicles in the Council fleet, assisting Parking Services to procure two electric vehicles, delivering staff benefits including the 'cycle to work' scheme, a green lease car scheme for staff and Easit, delivery of a district-wide network of electric vehicle charge points, the Local Cycling and Walking Infrastructure Plan, grant assisting the development of the Selsey Greenway (Selsey to Chichester) cycling and multi-user route, a feasibility study for a cycleway, behavioural change interventions in the community and schools and promotional activities such as for 'Bike to Work' day.

- 3.5. The draft for consultation revised AQAP contains an analysis of air quality monitoring and air quality modelling data with an emphasis on NO₂. Air quality in the district has steadily improved in the last five years and the modelling predicts that this trend will continue. Air quality in the Stockbridge A27 and Orchard Street AQMAs is such that the AQAP recommends these AQMAs are 'undeclared' and the Orchard Street air quality monitoring station is decommissioned. A watching brief is recommended for the St Pancras and Rumbold's Hill AQMAs which are predicted to both be compliant with the UK's Air Quality Standards by 2024.
- 3.6. The document contains a list of proposed and current air quality actions or projects with indicative timescales. For Midhurst this is informed by discussions with partners and community members following the more recent declaration of the Rumbold's Hill AQMA.
- 3.7. The Council also monitors ground-level Ozone (O₃) at Lodsworth. The pollutant is not included in the Local Air Quality Management regime and the AQAP proposes that the O₃ monitoring station is decommissioned as part of the post-Covid recovery work budget reductions.

4. Outcomes to be achieved

- 4.1. The outcomes sought through the AQAP are:
 - To present an evidence base from the air quality monitoring and modelling data for air quality policy in Chichester District,
 - To detail a proportionate policy response to the air quality issues in Chichester District,
 - To deliver actions that seek to improve air quality in Chichester District,
 - The future 'undeclaration' of the Orchard Street and Stockbridge A27 roundabout AQMAs (which will be the subject of a future Cabinet report(s)),
 - The future decommissioning of the air quality monitoring stations at Orchard Street and Lodsworth with an annual saving of approximately £5,000 and
 - To maintain a watching brief for NO₂ at St Pancras and Rumbolds Hill AQMAs.
- 4.2. This work supports the Corporate Plan priority that CDC will 'manage our built and natural environments to promote and maintain a positive sense of

place' and the actions in the Council's Climate Emergency Detailed Action Plan.

5. Proposal

- 5.1. To consult on the draft for consultation revised AQAP and, subsequently, to report back the consultation responses and draft for adoption AQAP to Cabinet.

6. Alternatives considered

- 6.1. None. Where an authority declares an AQMA the adoption of an AQAP is a statutory matter as is the requirement to publically consult on draft AQAPs.

7. Resource and legal implications

- 7.1. The intended work is within existing budgets in relation to staffing costs. The 'air quality actions' contained in the AQAP are either proposed and subject to funding, or where the projects are current, they are funded. The adoption of the AQAP post-consultation will help support bids for grant monies in the following five year period.

8. Consultation

- 8.1. Prior to going out for public consultation the AQAP has been considered by the Environment Panel on 24 February 2021 and the Overview and Scrutiny Committee (O&SC) on 9 March 2021. Environment Panel resolved: That the Environment Panel recommends to Cabinet that the revised AQAP be approved for public consultation. O&SC resolved: That O&SC recommends to Cabinet that the revised AQAP be approved for public consultation.
- 8.2. The Council will consult the following (including statutory consultees):
 - (i) Internal consultees: Development Management, Planning Policy, Parking Services, CDC Members via Members' Bulletin Board.
 - (ii) External consultees: Chichester City Council, West Sussex County Council (Planning and Transport Policy), the Environment Agency, Sussex-air, South Downs National Park Authority, West Sussex Public Health, Transition Chichester, Chichester and District Cycle Forum.
 - (iii) Public consultation by publishing on the Council's website 'Let's Talk' page.
- 8.3. The consultation period will be from 17 May to 28 June 2021.

9. Community impact and corporate risks

- 9.1. The adoption of an AQAP has, over the past 12 years, enabled successful grant bids for the delivery of a number of air quality actions (a selection of which are detailed at paragraph 3.4). The impact of the adoption of a revised AQAP will enable continued grant bids to deliver air quality actions as detailed in the AQAP.
- 9.2. The work proposed by the AQAP largely depends on grant funding. As such there remains the risk that relevant grants do not become available or that applications and bids do not result in CDC being awarded monies. Likewise, whilst we seek to deliver initiatives and interventions that offer the best business case we are nonetheless influenced by what grants are available. The AQAP allows for these possibilities and, whilst it seeks to direct our efforts to where they will have most effect, allows flexibility to accommodate the above issues.

10. Other Implications

	Yes	No
Crime and Disorder		✓
Biodiversity and Climate Change Mitigation Many air quality actions seek to enable walking and cycling and the reduction of use of liquid fuelled vehicles both of which also reduce carbon emissions.	✓	
Human Rights and Equality Impact		✓
Safeguarding and Early Help		✓
General Data Protection Regulations (GDPR)		✓
Health and Wellbeing Many air quality actions seek to enable walking and cycling and the reduction of use of liquid fuelled vehicles. Active travel and reduced air pollution have mental and physical health co-benefits.	✓	

11. Appendices

- 11.1. Draft revised AQAP for consultation.

Chichester District Council

Air Quality Action Plan

2021 - 2026

Prepared by Chichester District Council in fulfilment of Part IV of the Environment Act 1995

Local Air Quality Management

February 2021



Draft for Public Consultation

Consultation

This document is for public comment. We are keen to receive your views and ideas about the document and air quality generally. The public consultation closes on the 28th June 2021.

To comment on this consultation draft AQAP please log onto CDC's website at this link:

<https://www.chichester.gov.uk/letstalksurveys>

Simon Ballard
Environmental Protection Manager
01243 534694
sballard@chichester.gov.uk

Chichester District Council
East Pallant House
1 East Pallant
Chichester
West Sussex
PO19 1TY

Further details on our consultation can be found at Appendix 1 of this document. Thank you for your interest.

Foreword by Councillor Penny Plant, Cabinet Member for Environment and Chichester Contract Services:

Since the 2015 AQAP was adopted by the council air quality has risen steadily up the political agenda. The evidence base for the health impact of this 'invisible killer' has grown hugely over this period. Air pollution has occupied many newspapers' front pages and the public's desire to see action has likewise increased.

The health impacts of air pollution are now known to be systemic in humans. Perhaps unsurprisingly much of what we breathe can pass through our lungs into our bloodstream to be distributed through our bodies. Air pollution is implicated in health effects across the whole span of our lives and the whole function of our bodies with a massive body of statistical and clinical evidence supporting these assertions.

Local community expectations have also grown. In tackling air pollution there are linkages to tackling climate change and, as we move to adopt this plan in a post-Covid era, the 'lockdown' period has undoubtedly caused us to reflect on what we value which includes 'clean air' with the Prime Minister stating that 'clean air will be to the 21st century what clean water was to the 19th.'

There are now strong indications that local air quality has improved and is on an improving trend. The impacts of the post-Covid economy are yet to make themselves known. Nevertheless the good news is that Chichester district's air quality is increasingly compliant with the UK's air quality standards which are designed to protect the most vulnerable in our society.

Notwithstanding the improvements we continue to see air quality as an important public health issue where even air quality that is compliant with standards is known to have health impacts. We have strengthened our partnerships since the 2015 AQAP and will continue to strive to deliver meaningful projects that seek to tackle air pollution.

I hope you will find this action plan a proportionate and suitable response to the challenge of tackling air pollution and an approach that is realistically within the gift of what this authority and its partners can deliver.

P C Plant



Councillor Penny Plant
Cabinet Member for Environment and Chichester Contract Services

Chichester District Council

Local Authority Officer	Simon Ballard
Department	Environment and Planning
Address	Chichester District Council Pallant House 1 East Pallant Chichester PO19 1TY
Telephone	01243 534694
E-mail	sballard@chichester.gov.uk
Report Reference Number	AQAP 2021 – 2026
Date	February 2021

Executive summary

Chichester District Council (CDC) has produced this revised Air Quality Action Plan as part of its duty under the Environment Act 1995 subsequent to the declaration of four Air Quality Management Areas (AQMAs). The AQMAs are declared in relation to air quality in these locations failing to meet the UK air quality objective for Nitrogen Dioxide (NO₂). The declaration of an AQMA places a statutory obligation on us to produce an Air Quality Action Plan (AQAP).

This Plan presents and responds to the evidence gathered from our air quality monitoring and modelling and an analysis of the sources of air pollution contributing to the problem. The data does provide some good news in that Nitrogen Dioxide concentrations have fallen in recent years and our recent computerised modelling suggests that this trend will continue. Two of our four AQMAs could be 'undeclared' (Orchard Street and Stockbridge A27 roundabout) and Rumbolds Hill is currently borderline compliant with the relevant standard. St Pancras, Chichester remains non-compliant.

Nevertheless, despite the positive news, we cannot be complacent as air pollution does impact on health at concentrations below the UK's air quality standards and is the biggest environmental impact on health across the UK.

Since our 2015 AQAP there have been various events that have made the context for an AQAP significantly different to five years ago. The science that quantifies the health impacts of air pollution continues to become more refined with figures now being available for regional health impacts and air pollution being associated with a wide range of impacts on human health.

This AQAP sets out actions that will positively impact on our local air quality. These actions are both within and beyond the powers of this Council and likewise its finances. As such the actions proposed in this document will rely on effective engagement with our partners both to galvanise effective action and to seek monies to fund related projects. In this context our key partners are West Sussex County Council, Highways England and the local community..

Tackling gaseous transport emissions locally requires a move away from liquid fuelled vehicles. Using the evidence available key transport sectors can be targeted with policies to regulate, support and incentivise the shift. This particularly applies to diesel fuelled vehicles.

Maintaining or reducing pollutant levels and improving health in the context of new housing and employment related development requires evidence-based land-use and transport planning policies and actions.

The Action Plan details the most immediate and developed actions, outlines the actions in development and highlights those wider actions contributing to improved air quality. Where possible it sets out the known timescales, and reporting metrics for those actions. However the document is required to be flexible and be able to respond to funding and policy changes.

Update on progress with the AQAP measures, including the new measures, will be incorporated into the Annual Status Report on air quality in Chichester District; the most recent version is available on the Council website¹.

Responsibilities and Commitment

This AQAP was prepared by CDC's Environmental Protection Team with the support and agreement of the following:

CDC	Planning Policy
CDC	Development Control
Pan-Sussex	Sussex-air
WSCC	Highways
WSCC	Public Health

This AQAP will be subject to an annual review, appraisal of progress and reporting to CDC's Environment Panel by the authority's Annual Status Reports (ASRs), as part of our statutory Local Air Quality Management duties. All ASRs will be published on CDC's website.

¹ <https://www.chichester.gov.uk/pollutioncontrolairquality>

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1. Introduction

The purpose of the Air Quality Action Plan (AQAP) is to set out the evidence for air pollution in the district so to design and publish proportionate and targeted actions aimed at tackling air pollution. In Chichester district we have declared four Air Quality Management Areas and the evidence and response is separately described in the pages that follow. The document is informed by discussions with our key partners. As the source of local air pollution in Chichester district is traffic then our Highways colleagues at West Sussex County Council (as the local Highway Authority) and Highways England are key partners.

Whilst the Council cannot significantly affect air quality at a macro level, its actions, priorities and leadership can make a difference to local residents and businesses and thereby air quality. It can access funds, lobby for investment and influence others to work towards cost-effective outcomes; use its own land and estate in ways that encourage 'green' and healthier behaviour and signal to the local community the sort of activity that it wants to encourage through investment, leadership and publicity.

This plan will be reviewed every five years.

2. Review and Assessment of air quality

Part IV of the Environment Act 1995 requires local authorities to review and assess air quality on a regular basis. Pollution levels within the local authority area are assessed against air quality standards and objectives² (see Table 1 below) which are prescribed in national legislation for the protection of human health and the environment. The air quality standards are designed to protect those most vulnerable to the effects of air pollution and CDC reports annually to DEFRA in its statutorily required Annual Status Report³.

Table 1: The UK National Air Quality Objectives for the protection of human health:

National Air Quality Objectives⁴:				
Objective	Concentration measured as¹⁰	Date to be achieved by and maintained thereafter	European obligations	Date to be achieved by and maintained thereafter
Nitrogen Dioxide (NO₂)				
200µg.m ⁻³ not to be exceeded more than 18 times a year	1 hour mean	31 December 2005	200µg.m ⁻³ not to be exceeded more than 18 times a year	1 January 2010
40µg.m ⁻³	annual mean	31 December 2005	40µg.m ⁻³	1 January 2010
Particulates (PM₁₀)				
50µg.m ⁻³ not to be exceeded more than 35 times a year	24 hour mean	31 December 2004	50µg.m ⁻³ not to be exceeded more than 35 times a year	1 January 2005
40µg.m ⁻³	annual mean	31 December 2004	40µg.m ⁻³	1 January 2005

² https://uk-air.defra.gov.uk/assets/documents/National_air_quality_objectives.pdf

³ <https://www.chichester.gov.uk/pollutioncontrolairquality>

⁴ Objectives for other pollutants are not included here as air quality is compliant with them in Chichester and largely so across the UK.

3. The National context

Since the adoption of CDC's 2015 AQAP the public profile of air quality has grown very significantly. The metrics for the impact of air quality on human health have become ever more detailed so illuminating a wider understanding of the importance of good air quality. Air quality has become commonplace on the front-page of national newspapers, web-sites and social media feeds. The UK government states that 'air pollution is the top threat to public health after cancer, heart disease and obesity'⁵ with associated costs to our health of £1.7Bn/year at 2020 rising to £5.3Bn from 2030.⁶ Poor air quality is estimated to reduce life expectancy by an average of six months in the UK, is associated with lung disease, heart attacks and there is increasing evidence for association with cognitive decline and reduced lung-volume for children brought up in areas of poor air quality.

The UK government published a Clean Air Strategy (CAS) in 2019 which proposes tackling pollution from a wide range of sources including transport, agriculture, industry, domestic solid-fuel burning and domestic cleaning products. As some of the biggest sources of pollution have been tackled the contribution of some of the smaller sources has become relatively more significant so requiring new action. The opportunity here is to tackle pollution from many sources to make our air healthier to breathe, protect nature and boost the economy.

Across the UK 242 local authorities have one or more AQMA(s). Local government is responsible for many relevant policy areas including health, housing, transport, education, local economics, greenspace and quality of life. The CAS states 'in summary the current legislative framework has not driven sufficient action at a local level' and seeks through revised legislation to make the statutory basis for tackling air pollution at a local level more effective. This greater effectiveness is evolving⁶ as this document moves towards adoption.

The UK has a national emission reduction commitment for PM_{2.5}. The Local Air Quality Management (LAQM) Policy Guidance suggests that 'Local Authorities are expected to work towards reducing emissions and concentrations of PM_{2.5} in their area as practicable.'⁷ The Guidance is not specific about LA's involvement in this regard only that the LA should work with Public Health to define this role. Nevertheless there is growing national and local interest in this pollutant and so this document seeks to respond to that 'interest' in as far as is practicable. Many actions that seek to reduce NO₂ (the emphasis of this Plan) will also help to reduce particulate matter (PM) emissions too. The Policy guidance does however suggest that the authorities should seek 'to move towards a specific objective in line with the annual average EU⁷ limit value for PM_{2.5} of 25µgm⁻³ ⁸.

The greater national context as this document is being written might be described as one of uncertainty. The impact of the UK leaving the EU and the impact of Covid on economic activity are yet to be fully understood.

⁵

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf

⁶ See the Section on the Environment Bill.

⁷ The Guidance is yet to be updated for the removal of EU references.

⁸ See Appendix 5 which suggests that CDC's air quality meets that standard, in the worst case location, by a large margin.

4. The Environment Bill

The Environment Bill (EB) delivers key aspects of the Clean Air Strategy. As this AQAP was being written the detail of how the EB, as it becomes law (an Act), will impact on Local Air Quality Management (LAQM) was yet to be clear. Nevertheless the EB will, we understand, set a legally binding target for PM_{2.5}, an additional long-term air quality target, which will require Councils and other relevant public bodies to work together to resolve air quality issues and make it easier for LAs to enforce restrictions on smoke emissions from domestic burning⁹. The EB also gives the government the power to make vehicle manufacturers recall vehicles if they do not comply with relevant environmental standards. The EB details wider measures which are important both nationally and for Chichester District but that nonetheless won't be within the gift of LAs to deliver or enforce.

5. The Road to Zero

The Road to Zero Strategy outlines how the government will support the transition to zero emission road transport and reduce emissions from conventional vehicles during the transition. The Strategy is supported by funding, offered as grants, for the purchase of EVs and the installation of EV charge points. CDC has already access the Plugged in Car Grant to procure two Renault Zoe EV's for Parking Services and eighteen EV charge points installed across the district. Since the publishing of the Strategy it has since brought it's deadline to 2030 when all new cars in the UK will be EV (or zero-emission) only.

6. Public Health and air quality

Each year PHE publishes a Public Health Outcomes Framework¹⁰. Chichester has one of the lowest fraction of mortality (4.5% in 2019) attributable to particulate pollution (PM_{2.5}) of any area in the South East¹¹. Nevertheless particulates cause statistically measurable harm to human health at any airborne concentration. Whilst the sources of such pollution is significantly related to non-local sources there are still many actions that can be taken at a local level that will assist in reducing airborne concentrations.

7. Land-use planning and air quality

The adopted Local Plan provides the broad policy framework and a long-term strategy to manage development, protect the environment, deliver infrastructure and promote sustainable communities within Chichester District (excluding the area within the South Downs National Park) to 2029. CDC is in the process of revising its Local Plan and the Environmental Protection team and Planning Policy team are working together to ensure 'air quality's' policy presence within the revised Local Plan.

⁹ Burning wood and coal in open fires and stoves makes up 38% of the UK's primary emissions of fine particulate matter (PM_{2.5}).

¹⁰

<https://fingertips.phe.org.uk/search/particulate#page/0/gid/1/pat/6/par/E12000008/ati/101/are/E07000225/cid/4/page-options/ovw-do-0>

¹¹ Range 5% Chichester to 6.5% Dartford.

Sussex-air has developed Planning Guidance, 'Air Quality and Emissions Mitigation Guidance (2019)'¹² Officers are working to associate this document with the emerging Revised Local Plan so as to provide a proportionate place for air quality in planning policy.

The Environmental Protection team is also working towards the adoption of a Local Cycling and Walking Infrastructure Plan. Discussions with the policy planners are at an advanced stage and there is the intention to include route details, from the LCWIP, in the Revised Local Plan.

8. Gear Change

In 2020 the DfT published Gear Change 'A bold vision for cycling and walking'. Gear Change comes with a £2Bn budget for cycling and walking over the life of the current parliament. The document celebrates the many co-benefits of walking and cycling with the aim that 'Cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030'.

Working in partnership with WSCC the Council's LCWIP puts CDC in a good position to seek the benefit of the monies that come with Gear Change.

9. Strategic alignment

West Sussex Transport Plan review

The existing West Sussex Transport Plan 2011-26 (LTP3) is being reviewed to update WSCC's strategic approach to investment in, and management of, the transport network. The draft Plan is currently in preparation with the intention of public consultation in the summer of 2021 and adoption in 2022.

The Council and Sussex-air will engage with WSCC to ensure the presence of air quality related policy in that Plan. This will include sustainable transport, walking and cycling and supporting the uptake of EVs.

Chichester Car Park Strategy (2010 to 2020)

CDC's Car Park Strategy is currently under review with the intention of rewriting and updating the document. Covid has significantly impacted on car parking and the work to update the Strategy had been paused for several months during the pandemic. It is intended that this work will progress again in 2021.

West Sussex Climate Change Strategy (2020 – 2030)¹³

West Sussex County Council's Climate Change Strategy lists air quality amongst the benefits sought from tackling climate change through reducing transport by petrol and diesel to reduce Nitrogen Dioxide emissions.

West Sussex Electric Vehicle Strategy (2019 – 2030)¹⁴

¹² <https://sussex-air.net/ImprovingAQ/Default.aspx>

¹³ https://www.westsussex.gov.uk/media/14787/climate_change_strategy_2020-2030.pdf

WSCC published an ambitious Electric Vehicle Strategy in 2019 with the aims to create a public facing electric vehicle charging network powered by renewable energy.

Sussex-air

Sussex Air is a partnership of all the Local Authorities in Sussex which includes strong links to academic institutions (Brighton University and Imperial College, London).

The purpose of the partnership is to:

- Help Local Authorities to meet their statutory obligations to assess and report on local air quality through knowledge and best-practice sharing.
- Provide information to the public on air quality in their area.
- Collaboratively develop and deliver projects to improve local air quality and to reduce people's exposure to poor air quality.

airAlert

airAlert (<https://airalert.info/Sussex/Default.aspx>) is a free at point of receipt air pollution prediction service provided by Sussex-air. It is aimed at supporting those with pre-existing respiratory conditions in the management of their health either by a carer or directly themselves. Subscription is either by an app or via the Sussex-air webpages. Recipients then receive notifications by app, text or email when pollution (PM₁₀ or Ozone) predictions for the following day have potential to impact on their health. Subscribers can then amend their behaviour, either by minimising their exposure or by self-medicating.

The air quality predictions are produced daily by a team at Imperial College, London and are reviewed annually for their accuracy. Air quality monitoring data across the whole of Sussex, London and other parts of the South East, for whom Imperial manage the air quality data, informs the predictions and is mainly concerned with Ozone and PM₁₀ data. Currently there are 66 subscribers to the service in Chichester district (though this excludes the unknown number of persons who access the service by app) and a total of 1,171 subscribers across Sussex.

CDC Climate Change Action Plan

The Climate Change Action Plan (CCAP) was agreed by the Council in January 2021 and is the development of an initial plan that was agreed by Council in January 2020. This initial plan set a target for reducing greenhouse gases across the district of Chichester. The target is 10% reduction year on year until 2025 with year-end 2019 as the start point. While the primary greenhouse gas, carbon dioxide, does not fall under the air quality action plan, steps to reduce carbon dioxide emissions will have the additional benefit of reducing air pollution, particularly those from road transport. Nitrogen dioxide is both a greenhouse gas and air pollutant that falls under this air quality action plan and is found in exhaust fumes.

The CCAP outlines actions that the Council will take to reduce greenhouse emissions from transport. These actions will focus on behaviour changes rather than infrastructure projects which are largely under the remit of the highways authority, West Sussex County Council, and the Highways Agency. A public information campaign is planned which will promote low or zero carbon modes of transportation. The Council will also seek to provide information on funding opportunities that are

¹⁴ <https://www.westsussex.gov.uk/roads-and-travel/travel-and-public-transport/travelwise-sustainable-transport/electric-vehicles/>

available from central Government and useful contacts to other organisations so that they can promote low or zero carbon modes of transportation to their staff. The Council is working on collating and improving its staff incentives to use low or zero carbon modes of transport. This complements its policy of procuring electric vehicles unless there is a strong business case not to and its installation of public electric vehicle charge-points across the district.

10. Delivery under the previous AQAP

We have been working hard since the adoption of the 2015 AQAP seeking monies to deliver meaningful actions to tackle local air pollution. Actions delivered under the auspices of the 2015 – 2020 AQAP are described under the priorities outlined in that document as follows:

Priority 1: Measure, model and report on air quality

Under this priority we have:

- Added a further real-time air quality monitoring station for Nitrogen Dioxide (NO₂) on Westhampnett Road , Chichester,
- delivered air quality modelling to help facilitate an evidence base upon which to build this 2020 AQAP (this work is described in detail at section 12),
- continued to maintain and run four real-time air quality monitoring stations,
- continued to publish real-time air quality monitoring information on the internet at <http://www.sussex-air.net/> and
- continued to meet our annual statutory reporting requirement to DEFRA in a timely manner.

Priority 2: Strengthen partnerships, seek funds, pool resources and exploit synergies

Under this priority we have:

- Bid directly and been partners in an annual bid to DEFRA's annual Air Quality Grant fund,
- twice bid to the West Sussex Business Rates Pool monies for cycling (receiving a total of £131K),
- chaired the pan-Sussex air quality group of local authorities and academics known as Sussex-air,
- been active contributors to the Sussex-air document 'Air quality and emissions mitigation for Sussex (2020)'¹⁵,
- established stronger partnership working with West Sussex Public Health and
- attended and worked with the WSCC convened Inter-Authority Air Quality Working Group.

Priority 3: Encourage low emission technology

Under this priority we have:

- installed 18 electric vehicle charging points across Chichester district's car parks (see case study below),
- worked up the business case and introduced a policy for integrating electric vehicles in the CDC fleet,

¹⁵ <http://www.sussex-air.net/Reports/SussexAQGuidanceV.12020.pdf>

- catalysed and led, under the above described policy, the procurement of two electric vehicles for Parking Services,
- implemented the Easit scheme at CDC to encourage public transport use,
- implemented a car lease scheme at Chichester District Council which significantly incentivises the uptake of electric cars and
- won monies for the expansion of the Chichester car club.

Priority 4: Encourage and Foster behavioural change/modal shift

Under this priority we have:

- Delivered a draft for consultation Local Cycling and Walking Infrastructure Plan,
- delivered a small section of bike path at Franklin Place/Jubilee Gardens, Chichester,
- provided grant monies to support the development of the aspirational Selsey to Chichester bike path ('Selsey Greenway'),
- delivered a feasibility study for the conversion of a footway into a dual-use path on Oaklands Way, Chichester and
- carried out promotional activities on Bike to Work Day.

Priority 5: Be innovative, capitalise on opportunities and build on success

Under this priority we have:

- Been awarded £62K of Office for Low Emissions Vehicles grant money for the installation of eighteen electric vehicle charge points,
- been awarded £131K¹⁶ of grant monies from the Business Rates Pools money from WSCC (see case study 3 below) and
- been allocated CDC unspent £13K of S106 monies to enlarge the community car club in Chichester.

Case studies

Case study 1: Making the business case for electric vehicles in the CDC fleet

The Environmental Protection (EP) Team was awarded free DfT consultancy to establish the initial business case in principal for electric vehicles in the CDC fleet under a scheme then known as the Plugged in Fleet Initiative. EP officers then worked with the CDC finance team to build a whole-life costing spreadsheet for the procurement of EVs, this used input data from the Energy Savings Trust, CDC Estates, OLEV, vehicle providers and mileage records from vans in the existing fleet. The spreadsheet evidenced that it would be possible to pay back the excess capital cost of an EV compared to a conventional liquid fuelled vehicle through EVs significantly lower running and servicing costs and based on Parking Services mileage records. This enabled Parking Services to procure two Renault Zoe EVs in 2019.

The policy was approved by Cabinet in November 2015 such that the adopted policy is: 'That the Council purchases electric vans and cars instead of conventionally fuelled vehicles unless there are significant business reasons why this is not appropriate.' A supporting pack of information to support the policy has since been added to the CDC intranet and a briefing provided to all of the Corporate Management Team.

Case study 2: Electric vehicle charge points

¹⁶ As two separate awards of £70K and £61K.

EP Officers took a paper to Cabinet in December 2015 which resulted in Cabinet resolving to support a bid to the Office for Low Emission Vehicles (OLEV) for grant to support the installation of eighteen electric vehicle charge points with the support of up to £45K of match funding. A business model was then approved by the Senior Leadership Team to prove that the service could be provided and be revenue neutral to the authority. Two Frameworks for the provision of EVCPs were then assessed and a provider chosen, a specification for the EVCPs was written and a provider invited to tender. The resulting costs were used as the basis for a bid to OLEV who awarded CDC £62K. The install was managed by EP and the eighteen EVCPs are now operational.

Case study 3: Chichester City Local Cycling and Walking Infrastructure Plan

A successful bid to the West Sussex Business Rates Pool led to a grant award of £70K for cycling related projects. Following a Cabinet resolution to spend the monies a tender specification was written and a consultant awarded the contract to produce the Chichester City LCWIP. Two public consultation workshop sessions were held and, working in partnership with WSCC Highways, a draft LCWIP was produced. The draft for consultation document passed through Environment Panel, Development Plan and Infrastructure Panel, Overview and Scrutiny before approval for public consultation. 240 consultation responses were received and the document amended ready to pass back through the committees for approval by Cabinet for adoption in the spring of 2021. The Environmental Protection Team is working with Planning Policy colleagues to maximise the presence of the LCWIP schemes (routes) in the Revised Local Plan and Infrastructure Business Plan to maximise the opportunity for scheme delivery.

11. Chichester District Air Quality Management Areas

Chichester District Council (CDC) has four locations which exceeded the annual air quality standard for nitrogen dioxide (NO₂) and for which four AQMAs are declared. The AQMA locations are as listed below:

Table 2: Chichester District's AQMA details:

AQMA location (road):	Year declared:	Link to declaration order:
Orchard Street, Chichester (A286)	2007	https://www.chichester.gov.uk/media/7896/Orchard-Street-AQMA-Order/pdf/Orchard_Street_Order.pdf
St Pancras, Chichester (A286)	2007	https://www.chichester.gov.uk/media/7898/St-Pancras-AQMA-Order/pdf/St_Pancras_Order.pdf
Stockbridge A27 roundabout, Chichester (A27)	2006	https://www.chichester.gov.uk/media/7897/Stockbridge-AQMA-Order/pdf/Stockbridge_Order.pdf
Rumbold's Hill, Midhurst (A286, A272)	2020	https://www.chichester.gov.uk/media/33350/Rumbolds-Hill-AQMA-Order/pdf/AQMA_-_Rumbolds_Hill_-_Midhurst-.pdf

Description of Orchard Street, Chichester AQMA

Orchard Street is a residential street which is also part of the A286 trunk-road. The AQMA is only declared for the Eastern length of the street between Orchard Gardens and the junction with

Northgate roundabout, the street is broadly flat. The street also has Immanuel Church and Chichester Lancastrian Infants School and Central Church of England Academy school West of the AQMA boundary. The street is partially canyonised and experiences increased traffic volumes at peak hours.

Plan 1¹⁷: Orchard Street AQMA, Chichester:

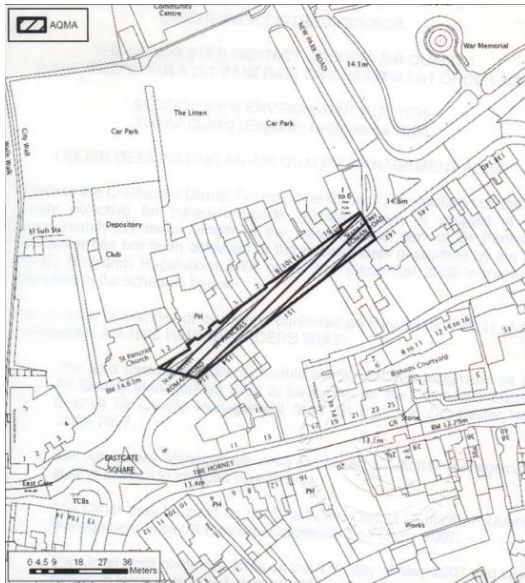


Description of St Pancras, Chichester AQMA

St Pancras is also part of the A286. Only the Western most section of St Pancras, between Eastgate Square and the junction with New Park Road, is declared an AQMA, the street is one-way traffic flowing West to East and is broadly flat. The AQMA contains mixed residential and retail properties where the ratio of the building heights to road width creates a canyonised street feature. Traffic generally flows freely though is subject to acceleration into the AQMA from being stopped at two pedestrian crossings, exiting East Street and traversing the sharp corner between the Hornet and St Pancras.

Plan 2: St Pancras AQMA, Chichester:

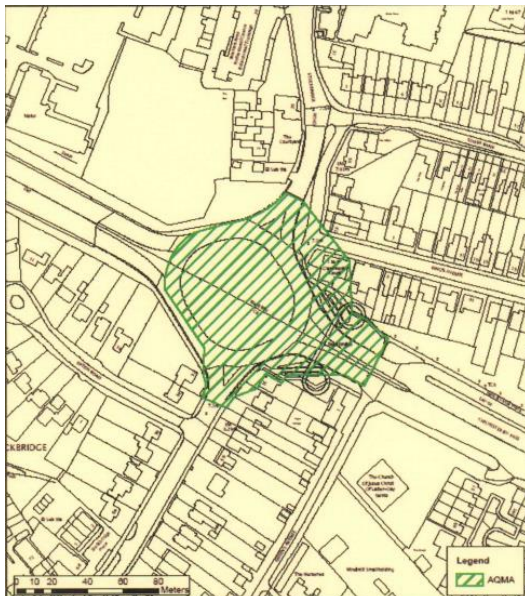
¹⁷ All AQMA plans are taken from the plan on the declaration Order at:
<https://www.chichester.gov.uk/pollutioncontrolairquality>



Description of Stockbridge A27 Roundabout AQMA

Stockbridge roundabout is a four arm roundabout at the junction of the A286 and A27 and where the junctions are on North-West to South-East and North East to South West axes and the topography is broadly flat. The junction features residential receptor locations in close proximity and a high degree of vehicle acceleration and deceleration in-to and out-of the junction. The junction generally does not feature significant queues but at peak hour does feature queueing. The junction is also the dominant route to the peninsula's sandy beaches and features significant congestion on sunny 'beach days' and when Goodwood is hosting large events which give rise to significant volumes of additional traffic.

Plan 3: Stockbridge A27 Roundabout AQMA, Chichester:



Description of Rumbold's Hill, Midhurst AQMA

Rumbold's Hill is designated as both the A286 and A272 and the AQMA is declared for the full length of Rumbold's Hill which runs, at its northern end, between North Street, Midhurst and the Petersfield Road and Bepton Road junction at its southern most extent. The road is on a gentle slope

The UK's Air Quality Objectives (AQO) only apply to prescribed locations and for the Annual Mean Standard for NO₂ the key location is residential facades. As such table 3 below details the numbers of residential facades within the relevant AQMA boundary.

AQMA Location:	Number of residential properties exposed:
Stockbridge A27 Roundabout, Chichester	1 in AQMA (comprising 9 flats) (7 properties abutting)
Orchard Street, Chichester	73 properties (inc 2 properties abutting)
St Pancras, Chichester	32 properties (inc 6 flats and 1 property abutting)
Rumbold's Hill, Midhurst	25 properties (including 16 flats) 1 property abutting

12. Summary of Air Quality Monitoring in Chichester District:

Introduction

CDC currently has eighteen air quality monitoring locations using diffusion tubes to monitor Nitrogen Dioxide and four real-time air quality monitoring stations to monitor pollutants as listed in table 4 below:

Table 4: Real-time air quality monitoring stations and the pollutants that they measure

Air quality monitoring station location:	Pollutants measured:
A27 Stockbridge layby ¹⁸ , Chichester	PM ₁₀ , NO ₂
Orchard Street, Chichester	NO ₂
Westhampnett Road, Chichester	NO ₂
Lodsworth, Chichester	O ₃

Note: The whole data-set of real-time air quality monitoring data for CDC and all Sussex air quality monitoring stations is available at: <http://www.sussex-air.net/>

Whilst we are appropriately resourced for air quality monitoring we are unable to monitor 'everywhere'. Over the years we have monitored in many additional locations. In locations where we have found air pollution concentrations to be highly compliant with the Objectives then we have discontinued monitoring there and often redeployed that resource to monitor at other locations of interest.

An annual summary of our air quality monitoring data is reported in the statutorily required Annual Status Report¹⁹ (ASR). This report is submitted to DEFRA who audit the report and our progress on delivery of the AQAP. The ASR includes plans of all monitoring locations.

Air quality monitoring is the pre-eminent evidence in considering local air quality in relation to the UK's air quality objectives. It tells us what airborne concentrations of pollutants there have been over defined periods, specific to the monitoring locations. CDC has approximately twenty years' worth of monitoring data and the recent year's reports are available on CDC's webpages. This data is the foundation of making an informed policy response to the local air quality challenges that are expressed through the data-set. It was also the principle evidence for the declaration of the AQMAs.

Monitoring in the same locations across time allows us to see trends in the data-set. These trends are important in considering the weight of 'air quality' as a policy area and how it influences related policy areas such as land-use planning, highways planning and transport.

Air quality monitoring only tells us about the past, what airborne concentrations of pollutants 'have been'. Of course our AQAP is all about influencing the future of air quality. As such we need to augment our understanding of past air quality, garnered from our air quality monitoring data, with an understanding of what we predict air quality to do in the future. As such we commissioned a consultancy to provide CDC with air quality modelling expertise. The outputs of the modelling are

¹⁸ East of Stockbridge A27 roundabout and AQMA on the north of the A27.

¹⁹ <https://www.chichester.gov.uk/pollutioncontrolairquality>

discussed at section 12 in this report. Nevertheless the air quality model is calibrated by reference to our monitoring data and so again we see the importance of our monitoring data in shaping our understanding of both the past, present and future of Chichester district's air pollution.

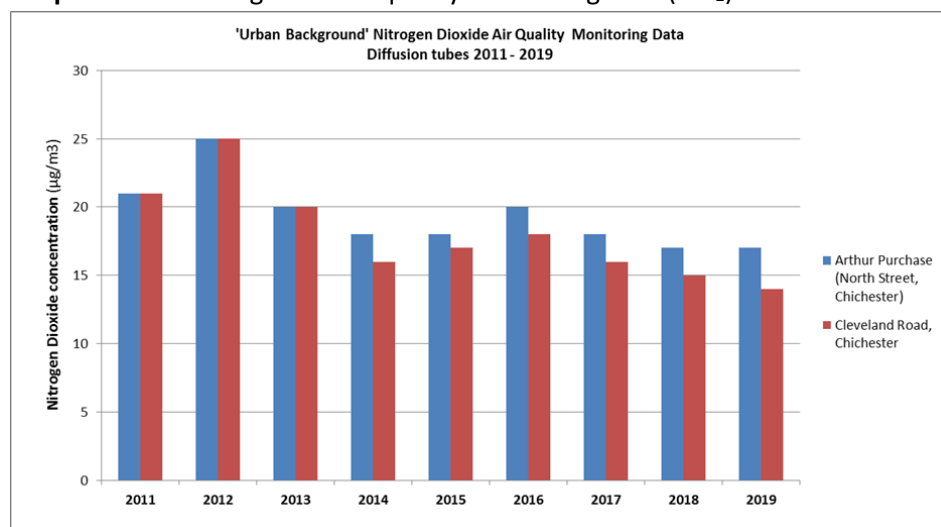
Covid-19 has significantly impacted on economic activity, especially through the mandated lockdown periods. The significantly lower traffic volumes through-out 2020 and into 2021 will impact on air pollution concentrations, nevertheless all of the monitoring data presented in this report is preCovid-19 and therefore unaffected by this consideration.

Air quality monitoring at 'background sites'

Broadly speaking air pollution consists of two components; local air pollution, from traffic, industry, bonfires, domestic emissions and agriculture etc – and – a 'background' component, which is pollution that may come from many hundreds of miles away and which arrives on the advected air mass, or, more simply put, is pollution blown by the wind from distant locations²⁰. It is very difficult to measure only the background pollution but it is possible to monitor in locations where the impact of local pollution is minimal²¹. CDC has two such locations, at North Street, Chichester and Cleveland Road, Chichester where we have long-term diffusion tube monitoring locations. We only have 'background sites' for NO₂.

Graph i below shows the last nine years' worth of data from these two locations.

Graph i: Urban background air quality monitoring sites (NO₂).



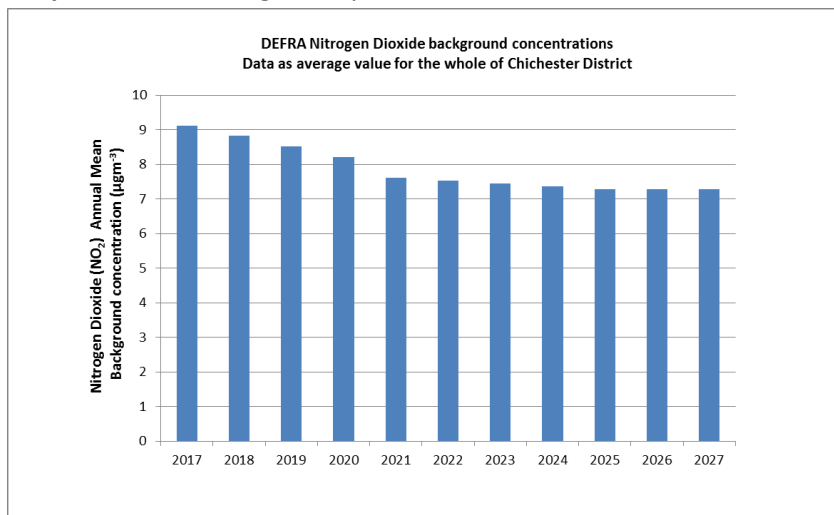
The graph clearly shows a trend of gently, but significantly improving air quality. This is important as it suggests that wider policy measures at a national and international level of government(s) are causing improvements in the air quality that is 'imported' into Chichester District. Of course there

²⁰ Some pollution changes its chemical and/or physical form during that journey. For instance some gaseous emissions turn into small particles, some mixtures of gases react to form new gases (for example Ozone) and some particles join together to form bigger particles or simply drop-out of the air stream through a variety of mechanisms.

²¹ Note: from a scientific point of view these monitoring locations are not measuring purely background pollution but they are classified as 'urban background sites' in accordance with DEFRA guidance for LAQM purposes.

are many variables at play here but a recent and significant variable is likely to be the impact of Covid-19 on economic output. Whilst there is an increasing de-coupling of economic output and environmental quality, it seems likely that the economic slow-down associated with the Covid-19 pandemic will cause a drop in emissions with a commensurate improvement in air quality. As such it seems probable that local background air pollution concentrations will be sustained or be improved. Nevertheless DEFRA's predictions for background NO₂ concentrations, stated as an average value for Chichester district show a slowing of the improvement in background NO₂ levels compared to 2017 – 2021 (see Graph ii). These values are not adjusted for the impact of Covid-19.

Graph ii: DEFRA background pollution concentrations 2017 - 2027²²²³



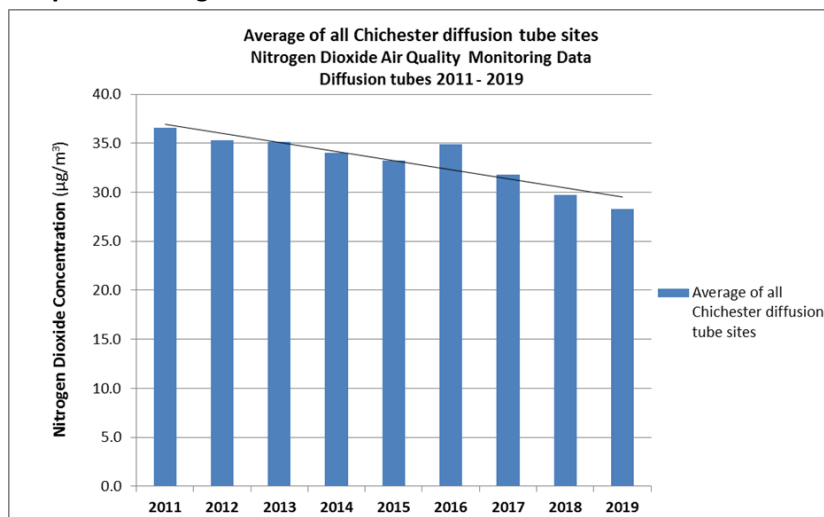
Nitrogen Dioxide overall data trend

There are many variables that affect air quality monitoring data such that all data is very specific to the location at which it was measured. As such, without very detailed scientific analysis of the data, 'seeing' trends accurately is fraught with challenges. One way of partially seeing through the 'noise' created by these variables is to average all of the available data. Graph iii below illustrates that approach²⁴.

²² Data from: <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2011>

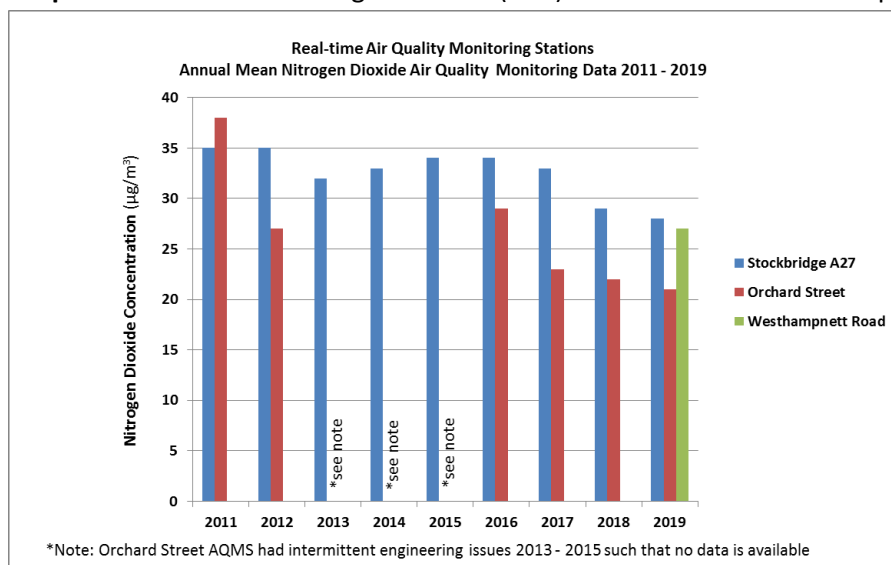
²³ Data range for 2019 6.94 to 15.86µgm⁻³.

²⁴ Note that the data is only averaged for the monitoring sites that have existed across the whole period (Kings Avenue/Southbank Junction, Claremont Court, A27 air quality monitoring station, Stockbridge Road South, Cleveland Road, Westhampnett Road, The Horner, St Pancras, Arthur Purchase North Street, St Pancras, Orchard Street) .

Graph iii: Average of all CDC diffusion tube data 2011 - 2019.

Within its limitations Graph iii suggests a clear trend towards improving air quality (for Nitrogen Dioxide) in Chichester district. Transport and in particular diesel fuelled road vehicles are the dominant source of NO_2 for our monitoring locations.

This trend is further amplified by the data from the real-time air quality monitoring stations, shown in Graph iv below:

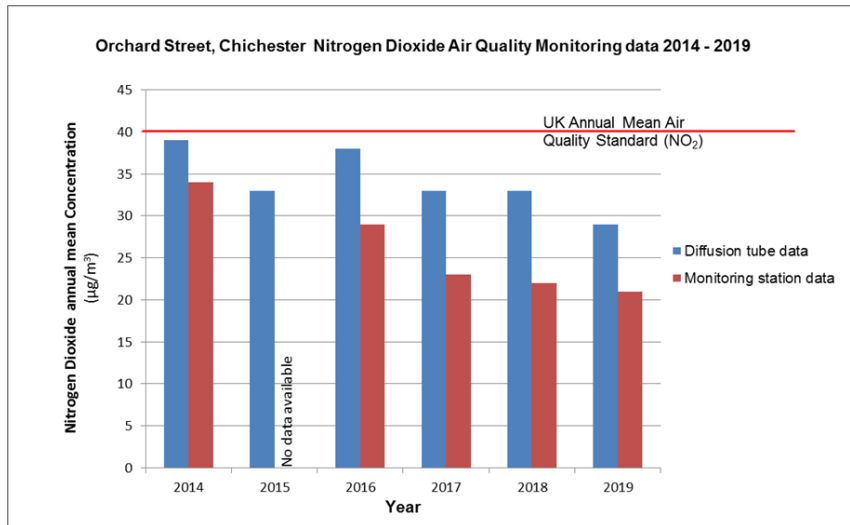
Graph iv: Annual mean Nitrogen Dioxide (NO_2) concentrations for all air quality monitoring stations

From all air quality monitoring data for NO_2 across the period of the previous AQAP 2015 – 2020 it appears that air quality has improved ie NO_2 concentrations have decreased.

13. Air quality within the AQMAs

Orchard Street AQMA

CDC has two monitoring locations in Orchard Street, one as a diffusion tube and one as a real-time air quality monitoring station. Data from both monitoring locations is presented in Graph v below:

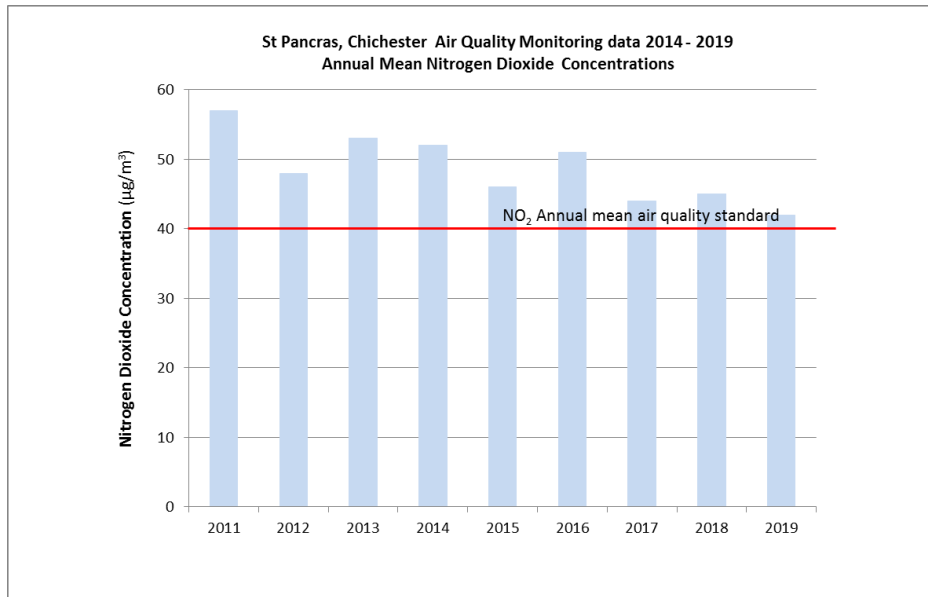
Graph v: All Orchard Street air quality monitoring data 2014 – 2019:

The monitoring data shows clear long-term compliance with significant headroom beneath the standard such that a return to previous concentrations is highly unlikely. As such the monitoring data strongly suggests that the AQMA at Orchard Street is no longer commensurate with the data. On the basis of the monitoring data the AQMA should be 'un-declared'. This is consistent with CDC's ASR 2019 and is further discussed at Section 29 of this report in relation to the air quality model's outputs for future years in this location. For the same reasons it would also be appropriate to withdraw the real-time monitoring station from Orchard Street but continue the diffusion tube monitoring there.

St Pancras AQMA

CDC has two NO₂ monitoring locations in the St Pancras AQMA, one at either end (East and West) and on opposing sides (North and South) of the canyonised section containing the AQMA. Graph vi below shows the monitoring data from this location though the data from only the original monitoring location is shown as the second location is under 12 months old²⁵.

²⁵ At the time of writing the 2019 ASR.

Graph vi: St Pancras air quality monitoring data 2011 – 2019:

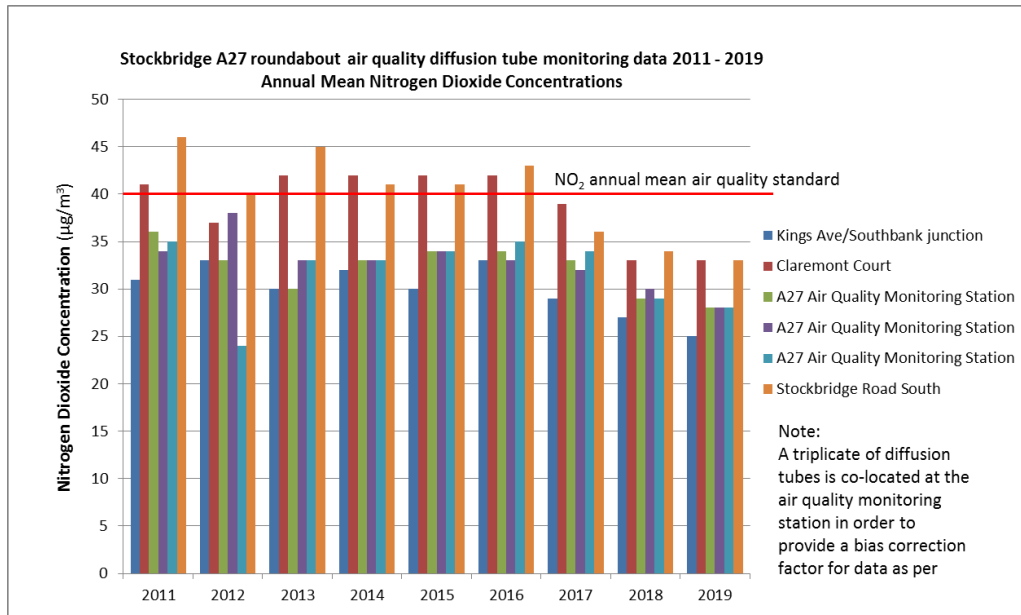
Whilst the monitoring data from St Pancras AQMA shows a trend towards improving air quality it is not yet compliant with the air quality standard. Monitoring will continue in this location in order for us to understand whether the trend of improving air quality ultimately leads to compliance.

Stockbridge

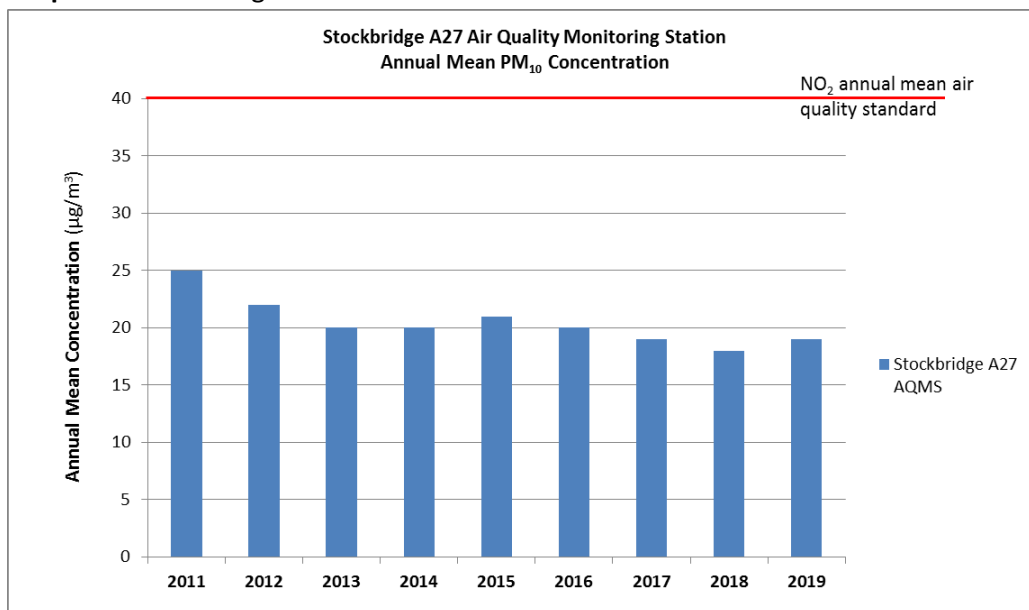
CDC has four monitoring locations in and around the Stockbridge A27 junction. Four as diffusion tubes and one as a real-time air quality monitoring station²⁶. Data from all monitoring locations is presented in Graphs vii to ix below:

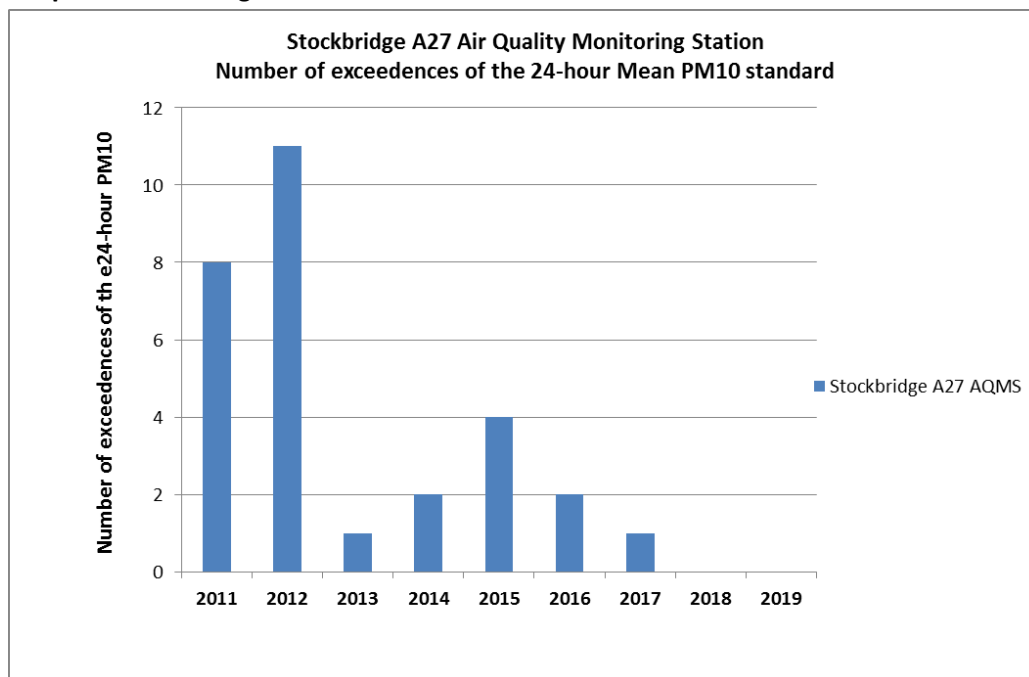
²⁶ where three diffusion tubes are co-located in order to provide a performance check on the data they provide, known as a bias correction factor.

Graph vii: Stockbridge diffusion tube monitoring data 2011 – 2019:



Graph viii: Stockbridge annual mean PM₁₀ concentrations 2011 – 2019:



Graph ix: Stockbridge PM₁₀ exceedences of the 24-hour mean standard 2011 - 2019:

From the monitoring data it is clear that air quality at this location has improved significantly and all Stockbridge monitoring locations have been compliant with the standard since 2017. This commentary is supported by the real-time data for both NO₂ and PM₁₀ which show significant improvements 2011 to 2019.

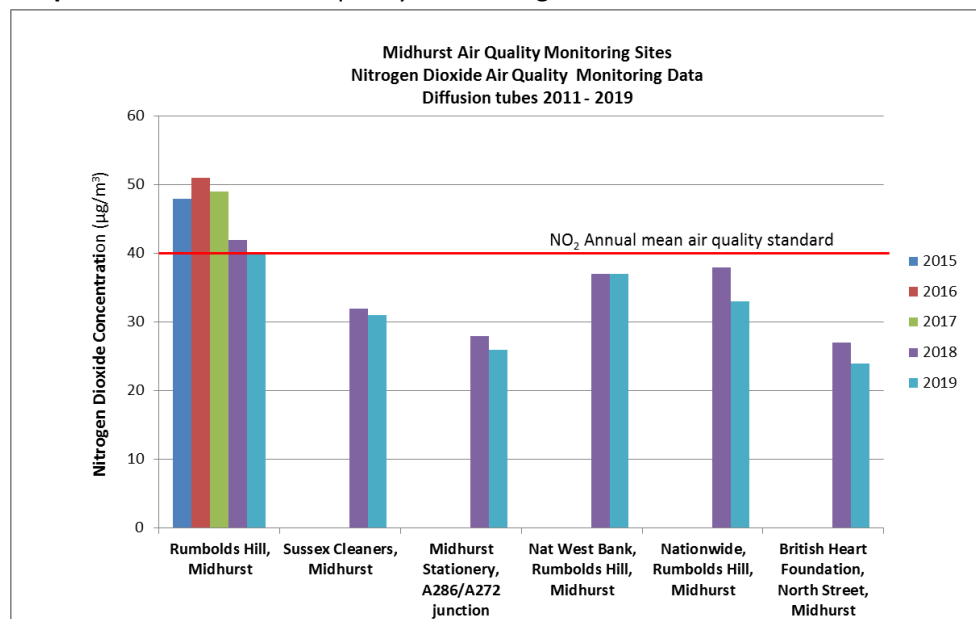
CDC does not monitor PM_{2.5}. Nevertheless we are aware of the importance of this pollutant in relation to public health and note that the Government's draft Environment Bill commits the UK to adopting an ambient air quality standard for PM_{2.5}. As such the DEFRA guidance provides a methodology for estimating PM_{2.5} from PM₁₀ monitoring data. Applying this methodology gives us an estimated 2019 annual mean concentration of PM_{2.5} at the Stockbridge air quality monitoring station (where we monitor PM₁₀) of 13.2µg_m⁻³. This is considered to be a worst-case location for this estimate given the proximity to the A27 with its ~48K annual average daily traffic flow. The calculation for this is presented at Appendix 5. This is comfortably compliant with the annual average EU²⁷ limit value for PM_{2.5} of 25µg_m⁻³ as suggested by the Policy Guidance.

Both the monitoring data and modelling data (presented at section 29 below) have been discussed with Highways England (HE) (as the A27 is managed by HE). Officers of both organisations agree that the monitoring data indicates that this AQMA could be un-declared.

Rumbolds Hill

Rumbolds Hill was declared as an AQMA in January 2020. As such CDC has several monitoring locations there in order to best inform our understanding of air quality there. The two monitoring locations that are both outside of the AQMA (Midhurst Stationary and the British Heart Foundation (BHF)) suggest that the topography of Rumbolds Hill is important in relation to the air quality there. The BHF monitoring site largely carries an identical volume of traffic and yet because it is outside of the narrow streetscape of Rumbolds Hill it's air quality is very significantly better.

²⁷ The Guidance is yet to be updated for the removal of EU references.

Graph x: Rumbolds Hill air quality monitoring data 2015 - 2019

Nevertheless the 2019 air quality data for the long-term diffusion tube site at Rumbolds Hill is borderline compliant with the air quality standard.

Ozone monitoring

The Council monitor ground-level Ozone at Lodsworth in the north of the district as the pollutant mostly affects rural air quality away from other sources of pollution. Ozone is an important pollutant both in relation to public health, its impact on crop-yields and other eco-system effects. Whilst the National Air Quality Objective for Ozone (see table 5 below) is not part of Local Air Quality Management we have monitored it since 2006²⁸. The data is an important input for the Sussex-air pollution forecast airAlert²⁹ service and the bulk of spring and summertime airAlerts are for ground level ozone. The data at Lodsworth is commonly non-compliant with the Air Quality Objective (see Graph xi below).

There is discussion about this pollutant in relation to the warming climate. As the pollutant is produced by photochemical atmospheric reactions driven by bright sunshine then it is predicted that ground level ozone will worsen due to climate change.

Table 5: National air quality standard for Ozone:

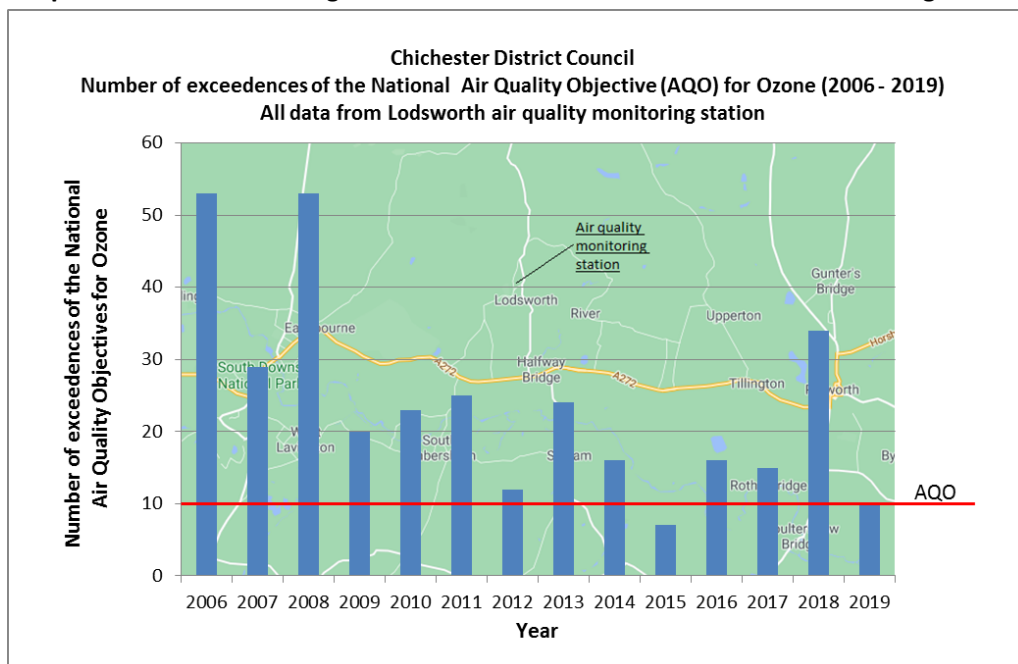
Pollutant:	Objective:	Concentration measured as:	Date to be achieved by:
Ozone	100µgm ⁻³ not to be exceeded more than ten times a year	8 hour mean	31 December 2005

²⁸ The capital cost of installing the station was funded by European grant money as part of a Sussex-air Interreg project.

²⁹ The airAlert service can be found at this link: <https://airalert.info/Sussex/>

Nevertheless, given the non-statutory nature of the monitoring it is intended to withdraw from ozone monitoring.

Graph xi: Ozone monitoring data from Lodsworth real-time Ozone monitoring station:



14. Air Quality Modelling Data in Chichester District

1. Introduction

Air quality modelling is an important tool for air quality scientists as it allows us to predict future air quality for specified pollutants and provide us with a spatial picture of air pollution. This compares to air quality monitoring which informs us about the past and (spatially) only for the monitoring point where the data was collected.

Modelling also allows insights into the sources of pollution that make up the overall burden in any modelled location. This is known as 'source-apportionment' and allows for policy makers more discrimination into what sources of pollution are most important. This is important evidence upon which we can build a targeted response pointed at the worst polluters on a location by location basis. Furthermore modelling allows us to predict the impact of proposed actions to inform our understanding before we commit our resources to any one action.

CDC does not have an in-house capability for air quality modelling and as such commissioned external consultants to deliver the modelling. The full report is at the link here: <<<< link air quality modelling report link here >>>>

Scope and description of the air quality modelling work

Our consultant was instructed to provide modelling data for a range of locations for the years 2018, 2020 and 2025. The locations specified were:

The Locations of the AQMAs ie:

- Orchards Street,
- Stockbridge A27 roundabout, Chichester,
- St Pancras, Chichester and
- Rumbold's Hill, Midhurst.

Additional locations were specified, with the reason for them being specified for modelling provided in brackets, as follows:

- The Hornet, Chichester (the Council's diffusion tube monitoring data indicated a potential for the site to breach the NO₂ annual mean standard),
- Whyke A27 roundabout, Chichester (HE A27 Chichester Bypass Environmental Study Report Appendices (February 2016) detail air quality monitoring that exceeded the NO₂ annual mean air quality standard and air quality modelling submitted with planning application reference 19/01286/FUL predicted an annual mean concentration of NO₂ for 2019 of 39.6µgm⁻³).

Modelling was undertaken using software known as the Advanced Dispersion Modelling Software (ADMS Roads). Other details of the modelling approach include:

- The pollutants modelled were; NO₂, PM₁₀ and PM_{2.5} all as annual mean concentrations,
- for the base year 2018 and future years 2020 and 2025,
- predictions for specified property facades in and around the locations specified above,
- using the most relevant meteorological data-set (for Charlwood, 2018),
- using CDC air quality monitoring data,
- using DEFRA background air quality data,
- using WSCC, DfT and HE traffic data and future year growth factors agreed with WSCC,
- using the DEFRA Emissions Factors Toolkit,
- traffic data included 11 categories of vehicles (including bus fleet data supplied by WSCC) and
- the ADMS model was set-up to reflect the urban topography and acceleration and braking of vehicles at junctions.

As per best practice specified in the DEFRA guidance (TG(16)) the model was run for each location and then verified for the baseline year of 2018. This is done by comparing the model's output predictions for 2018 to the relevant monitoring location's data. An adjustment factor is then derived which is applied to the model on a location specific basis. The verified model was then run to make predictions as presented below.

Because the traffic data input into the model was broken down into 11 vehicle classes then the ADMS model also provides separate predictions for each class of vehicle. This is known as 'source apportionment' and allows for an understanding of the relative contribution of pollution from each vehicle class.

Baseline model results

The model output data for a 'do nothing' scenario is as presented in Table 6 below:

Table 6: Baseline model output NO₂ Chichester locations:

Receptor location:	Chichester						
	NO ₂ concentration - annual mean (µgm ⁻³)						
	2018	2020	2021	2022	2023	2024	2025
1	34.5	31.5	29.4	27.9	26.4	25.1	23.8
2	<u>39.9</u>	<u>36.4</u>	33.8	31.9	30.1	28.5	27.0
(3,4,5)	31.8	29.1	27.2	25.8	24.5	23.3	22.1
6	34.6	31.5	29.5	27.9	26.4	25.1	23.8
8	32.3	30.4	29.0	27.9	26.8	25.8	24.5
9	41.5	<u>39.0</u>	<u>37.2</u>	35.8	34.4	33.1	31.3
10	50.2	47.0	44.7	42.6	40.7	<u>38.8</u>	<u>36.6</u>
12	<u>36.6</u>	34.4	32.8	31.6	30.3	29.2	27.6
CI1	31.8	29.1	27.2	25.8	24.5	23.3	22.1
CI4	24.7	23.4	22.5	21.8	21.1	20.5	19.7
15	40.0	<u>37.6</u>	35.9	34.6	33.3	32.0	30.3
W1	43.5	<u>39.5</u>	<u>36.8</u>	34.8	32.9	31.2	29.5
W2	31.3	28.6	26.8	25.5	24.3	23.1	22.0
O1	30.7	28.4	26.8	25.7	24.7	23.7	22.7
O2	42.4	<u>39.0</u>	<u>36.6</u>	35.0	33.4	31.9	30.3

Note: Exceedances of the Air Quality Standard are shown in bold and those within 10% (>36µgm⁻³) are underlined).

Table 7: Baseline model output NO₂ Midhurst locations:

Receptor location:	Midhurst						
	NO ₂ concentration - annual mean (µgm ⁻³)						
	2018	2020	2021	2022	2023	2024	2025
14	39.9	36.9	35.4	33.8	32.6	31.8	29.1
18	36.2	33.6	32.2	30.8	29.6	28.9	26.6
19	37.7	34.9	33.4	32.0	30.9	30.1	27.6
20	34.7	32.2	30.9	29.6	28.5	27.8	25.6
21	32.6	30.3	29.1	27.9	26.9	26.3	24.2

Note: Exceedances of the Air Quality Standard are shown in bold and those within 10% (>36µgm⁻³) are underlined).

The receptor locations in Tables 8 and 9 above are defined as below:

Table 8: Chichester Receptor location descriptions:

Chichester receptor locations:				
Receptor ID	NGR X	NGR Y	Location description:	
1	485773.91	103960.26	Kings Ave/ Southbank Junction	Stockbridge Roundabout AQMA

2	485771.47	103847.47	Claremont Court	Stockbridge Roundabout AQMA
(3,4,5)	485880.84	103791.63	AQMS on Chichester Bypass (A27) and Stockbridge Roundabout	Stockbridge Roundabout AQMA
6	485695.78	103730.9	Stockbridge Rd South (A286)	Stockbridge Roundabout AQMA
8	487340.41	105474.71	Westhampnett Rd	-
9	486502.25	104793.87	The Hornet	(South of) St Pancras AQMA
10	486532.97	104860.06	St Pancras	St Pancras AQMA
12	485913.44	105186.34	174 Orchard St	Orchard St AQMA
CI1	485880.84	103791.63	Stockbridge, near to the Chichester Bypass and Stockbridge R'about	Stockbridge Roundabout AQMA
CI4	485981.41	105222.45	Orchard St	Orchard St AQMA
15	486575.92	104799.25	32 The Hornet	(South of) St Pancras AQMA
W1	486916.28	103709.01	Nursing Home, Whyke Rd (B2135)	NE of Whyke/A27 roundabout
W2	486843.81	103719.1	22/23 Whyke Close	NW of Whyke/A27 roundabout
O1	487745.06	105015.62	Church Rd property	NW of Oving Rd/A27 intersection
O2	487803.03	104975.94	187/188 Oving Rd property	SE of Oving Rd/A27 intersection

Table 9: Midhurst receptor locations:

Midhurst receptor locations			
Receptor ID	NGR X	NGR Y	Location description:
14	488559.88	121478.29	Rumbold's Hill
18	488544.69	121434.01	Rumbold's Hill (Stationary Shop)
19	488583.53	121511.69	Rumbold's Hill (Natwest)
20	488601.94	121538.76	Rumbold's Hill (Nationwide)
21	488629.56	121614.62	North Street (BHF)

The model outputs for PM₁₀ and PM_{2.5} are not presented here as the modelling output data predicted no exceedance of the short-term or annual-mean standards³⁰ though the data is available in the air quality model reports³¹.

Baseline model outputs discussion

The model predicts improving air quality year-on-year to the final years modelled (2025). Full compliance with the UK Air Quality Standards is predicted by 2024 with St Pancras being the last site to comply. The model outputs are all verified against diffusion tube data for 2018, an adjustment factor is then applied to the model such that it accords well with monitored pollution concentrations in the baseline year (2018). The adjusted model performs well i.e. it predicts pollution concentration values close to monitored concentrations. Nevertheless the model verification set-up is such that it predicts for a height of 3m which is the same height as the diffusion tubes' exposure locations. When the model is run for pollution concentrations for LAQM purposes the pollution concentrations are modelled at a height of 1.5m ie in the breathing zone. Whilst this has not generally caused any anomalies it has caused some model performance issues for St Pancras. Further discussion of this point is as below.

Orchard Street, Chichester AQMA

Orchard Street (Receptor location 12) is predicted to continue to have improved air quality and increased compliance with the air quality standard. The modelled data confirms the conclusion that the AQMA is no longer commensurate with the measured and modelled data. As such the AQMA could be undeclared.

St Pancras, Chichester AQMA

St Pancras (receptor location 10) is predicted to continue to have improving air quality leading to marginal compliance with the Air Quality Standard in 2024. Nevertheless the modelling does not compare to the monitoring data for this site; the modelled prediction for 2018 is 50.2µgm⁻³ whereas the diffusion tube result for 2018 is 45 µgm⁻³, similarly the modelled result for 2019 is 47µgm⁻³ against the measurement of 42 µgm⁻³. This apparent discrepancy, not observed to the same degree for other modelled locations is explained by artefacts in the modelling software. In fact the model verification shows that the model performs well for St Pancras. The apparent discrepancy arises from the model verification being run for a height of 3m, which is the height of the diffusion tube exposure location, whereas the actual model run is for a height of 1.5m, ie the breathing zone. Nevertheless the modelled data's discrepancy with the monitoring data at 1.5m is large and as such this needs to be borne in mind when designing a proportionate policy response. As such a watching brief is recommended to see how air quality in St Pancras changes in the period of this Plan, though it appears that the modelling here is significantly more pessimistic than the monitoring suggests.

³⁰ The model out-puts for particulates (PM₁₀ and PM_{2.5}) are included in the full modelling report appendices).

³¹ See Appendix D Table D.2.

Stockbridge, Chichester AQMA

Stockbridge AQMA (receptor locations 1 to 6) is predicted to continue to have improved air quality and significantly increased compliance with the AQS in 2025. This confirms the monitoring data and suggests that the AQMA could be undeclared.

Rumbolds Hill, Midhurst AQMA

Rumbolds Hill (receptor locations 14 – 20) is predicted to move from marginal compliance to full compliance at 2025. Again should this modelled trend be borne out in monitoring data then the AQMA could be undeclared.

The Hornet

The Hornet (receptor location 9 & 15) is predicted to continue to have improved air quality and move further from being a candidate AQMA with little apparent risk of being declared as an AQMA.

Whyke A27 roundabout

Whyke nursing home (receptor location W1)) is predicted to continue to have improved air quality and move from being a candidate AQMA to compliance with the air quality standard for NO₂.

Oving Road A27 cross-roads

Oving Road (receptor location O2) is predicted to continue to have improved air quality and move further from being a candidate AQMA.

Source apportionment results

Following analysis of the output data from the baseline model source-apportionment (as described in the 'scope and description' section above) was carried out for the locations of most concern as modelling indicated their potential to continue to be non-compliant with the NO₂ annual mean standard.

Source apportionment was refined for buses as WSCC supplied detail of the operator Stagecoach's fleet (vehicle type, age and route). No data was available for hackney cabs or licensed private hire vehicles and so their impact on local air quality was not able to be modelled.

Output for source apportionment is for total 'NO_x' for each location ie not for 'NO₂'. This best represents how vehicles emit this pollution. The sub-species of NO_x are then oxidised in the environment to become NO₂. The baseline model outputs include source apportionment pie charts for the years 2018, 2020 and 2025. As such readers wishing to see the pie-charts should follow the link from this report to the baseline modelling report, though in any case the summary tables are included in the section that follows.

Note: None of the source apportionment includes background NO_x but instead focus is on the local vehicular emission sources. Source apportionment is not carried out for Orchard Street AQMA as the location is now highly compliant with the AQS.

No exceedances of the particulate (PM₁₀ and PM_{2.5}) AQS were identified at any of the modelled locations in 2018, 2020 and 2025 and so the data is not presented or discussed in detail in the AQAP but is available in the modelling reports.

Table 10: St Pancras AQMA source apportionment:

	NOx source apportionment		
Vehicle type:	2018	2020	2025
Petrol Cars (%)	7.4%	7.3%	9.5%
Diesel Cars (%)	50.5%	51.4%	50.3%
Taxis (%)	-	-	-
Petrol LGVs (%)	0.1%	0.0%	0.0%
Diesel LGVs (%)	26.6%	25.9%	22.6%
Rigid HGVs (%)	2.7%	2.0%	1.2%
Artic HGVs (%)	0.8%	0.5%	0.3%
Buses/Coaches (%)	11.6%	12.0%	13.9%
Motorcycles (%)	-	-	-
Full Hybrid Petrol Cars (%)	0.1%	0.2%	0.5%
Plug-In Hybrid Petrol Cars (%)	0.0%	0.0%	0.1%
Full Hybrid Diesel Cars (%)	0.2%	0.5%	1.4%
Battery EV Cars (%)	-	-	-

Table 11: Stockbridge A27 roundabout source apportionment

	NOx source apportionment		
Vehicle type:	2018	2020	2025
Petrol Cars (%)	5.3%	5.6%	8.0%
Diesel Cars (%)	36.2%	39.1%	42.1%
Taxis (%)	-	-	-
Petrol LGVs (%)	0.1%	0.1%	0.1%
Diesel LGVs (%)	35.9%	37.1%	35.5%
Rigid HGVs (%)	16.1%	12.8%	8.1%
Artic HGVs (%)	4.5%	3.0%	2.3%
Buses/Coaches (%)	1.6%	1.7%	2.2%
Motorcycles (%)	-	-	-
Full Hybrid Petrol Cars (%)	0.1%	0.2%	0.4%
Plug-In Hybrid Petrol Cars (%)	0.0%	0.0%	0.1%
Full Hybrid Diesel Cars (%)	0.2%	0.4%	1.2%
Battery EV Cars (%)	-	-	-

Table 12: Rumbold's Hill AQMA, source apportionment

	NOx source apportionment		
Vehicle type:	2018	2020	2025
Petrol Cars (%)	3.3%	3.3%	4.4%
Diesel Cars (%)	30.6%	31.8%	31.6%
Taxis (%)	-	-	-
Petrol LGVs (%)	0.0%	0.0%	0.0%

Diesel LGVs (%)	20.8%	20.7%	18.6%
Rigid HGVs (%)	7.0%	5.4%	3.3%
Artic HGVs (%)	5.5%	3.8%	2.8%
Buses/Coaches (%)	32.1%	34.1%	37.8%
Motorcycles (%)	0.2%	0.2%	0.2%
Full Hybrid Petrol Cars (%)	0.1%	0.1%	0.2%
Plug-In Hybrid Petrol Cars (%)	0.0%	0.0%	0.0%
Full Hybrid Diesel Cars (%)	0.1%	0.3%	0.9%
Battery EV Cars (%)	-	-	-

Source-apportionment conclusions

St Pancras, Chichester AQMA

NOx emissions from the diesel car and diesel LGV sector dominate the St Pancras AQMA location with the ratio of NOx emissions at approx. 77% in 2018 but reducing to 73% toward 2025. Bus and coach emissions are lower but significant over the period, increasing slightly from 11.6% to 14%. The ratio of HGV emissions is relatively small with a decline over this period from approx. 3.5% to 1.5%.

Stockbridge A27 roundabout, Chichester AQMA

NOx emissions from the diesel car and diesel LGV sector dominate the Stockbridge AQMA /A27 location with the ratio of NOx emissions between approx. 72% to 77.5% over the period between 2018 and 2025. HGV emissions are significant at 20.5% in 2018, however reduce to approx. 10.5% by 2025. Bus and coach emissions are small in comparison at 1.6% in 2018 and increasing to 2.2% by 2025. There is an increase in Hybrid Diesel vehicle emissions as a contribution over the period 2018 – 2025 with emissions rising from 0.2% to 1.2% by 2025.

Rumbolds Hill, Midhurst AQMA

NOx emissions from the Bus, diesel car and diesel LGV sectors dominate the Midhurst location with the ratio of NOx emissions at approx. 85% over the period between 2018 and 2025. HGV emissions decline as a proportion of the total NOx emissions over this period with a reduction from approx. 12.5% to 6%.

Scenario modelling

As described above; baseline modelling (presented and discussed above) provides outputs for the future years modelled (2018, 2020 and 2025). The modelling assumption at this point is that no interventions (no air quality actions) are made in an attempt to improve air quality (though the input data includes assumptions about fleet improvements and the number of vehicle movements due to additional housing and a larger local population). The source-apportionment (presented above) allows us to understand how the different classes of vehicles that make up the vehicle fleet contribute pollution to air quality in a specific area. This understanding can assist us in designing interventions that are targeted and proportionate.

To design effective policy it is necessary to focus air quality actions on issues which it is theoretically possible for the Council and its partners to affect. As such the two scenarios chosen for modelling were improved bus emission standards and modal-shift.

For St Pancras and Rumbolds Hill AQMAs buses are identified as significant contributors of NO_x at 37.8% and 13.9% of all vehicle emissions respectively.

Chichester Buses Low Emission Zone Scenario modelling

WSCC provided details of Stagecoach's current fleet's engine standards and an indication of which routes the vehicles were run on. This enabled model runs to establish the predicted NO_x contribution from the buses to the St Pancras AQMA and all Chichester receptor locations both with the fleet as existing (baseline) and with the fleet fully upgraded to Euro VI engine standard.

The full details of this scenario are in the air quality modelling 'Report 2: Scenario Modelling'. For several receptor locations this scenario makes a significant difference in the predicted NO₂ concentration compared to the baseline. For The Hornet, St Pancras and Orchard Street the predicted reduction in the annual mean concentration is of the range -2.9 µgm⁻³ to -3.5µgm⁻³ at 2021. As such, from a pure air quality perspective this scenario is a priority action for this plan.

Modal shift scenario

Modal-shift is getting people out of their cars to greener modes of transport and, where possible, to walk and cycle. Walking and cycling are zero emission forms of transport and are ideal, subject to many variables, for local journeys. AQAPs commonly seek to affect transport mode choice and in particular to promote walking and cycling. As such two highly ambitious mode –shift scenarios, of 2% and 5%, were modelled.

The maximum annual mean NO₂ concentration reduction predicted by the 5% modal-shift (to zero emission transport) at 2021 was -0.9 µgm⁻³ for Chichester and -0.4 µgm⁻³ for Midhurst. Nevertheless mode-shift has a multitude of co-benefits for physical health, mental health and climate change and remains a priority for this AQAP.

15. Required reductions in emissions

DEFRA require that authorities detail the reduction in emissions required for a location to become compliant with the relevant air quality standard.

Orchard Street AQMA

Air quality monitoring data from Orchard Street indicates that air quality at that location has been compliant with the annual mean NO₂ standard for over five years. Furthermore the five year trend in air quality there is towards greater compliance and the degree of compliance is now significant.

Air quality modelling data for Orchard Street builds on the evidence from the air quality monitoring and suggests that at 2020 the degree of compliance will be approximately $7 \mu\text{gm}^{-3}$ (or 17.5%) and by 2025 the degree of compliance will be $10 \mu\text{gm}^{-3}$ (or 25%).

Given the length of time that air quality at Orchard Street has been compliant and the comfortable degree of compliance currently and predicted for the future then it is concluded that this AQMA is a candidate for being undeclared. CDC will wait to see this year's air quality data (in spring 2021) and, in the event that it confirms the conclusions here, will move to un-declare the Orchard Street AQMA.

Stockbridge A27 roundabout AQMA

Worst-case air quality monitoring data from the Stockbridge AQMA indicates that air quality at that location has been compliant with the annual mean NO_2 standard for three years. Furthermore the five year trend in air quality there is towards greater compliance and the degree of compliance is now significant.

Air quality modelling data for Stockbridge AQMA builds on the evidence from the air quality monitoring and suggests that at 2020 the degree of compliance will be approximately $10 \mu\text{gm}^{-3}$ (or 25%) and by 2020 the degree of compliance will be $15 \mu\text{gm}^{-3}$ (or 38%).

Given the length of time that air quality at Stockbridge has been compliant and the comfortable degree of compliance currently and predicted for the future then it is concluded that this AQMA is a candidate for being undeclared. CDC will wait to see this year's air quality data (in spring 2021) and, in the event that it confirms the conclusions here, will move to un-declare the Stockbridge AQMA. This position is caveated by CDC's consideration of what, if anything, HE might propose for the A27 improvements and specifically whether such proposals amend the junction layout at Stockbridge.

Rumbold's Hill, Midhurst AQMA

At the current time Rumbold's Hill's air quality monitoring data indicates that air quality there is at parity with the Air Quality Standard. As such air quality at this location is compliant, albeit very marginally. Given the reduction in traffic volumes through the period of Covid-19 then we anticipate that the 2020 monitoring data will not be a reliable metric by which to establish any indication of a trend in pollution concentrations. As such it seems likely that the first data useful in making judgements about pollution trends at this location will be available in the spring of 2022.

In any case the air quality modelling for this location suggests a trend of increasing compliance.

As such there is no required reduction in pollution levels in this location in order to achieve compliance. Nevertheless a watching brief is recommended of a minimum period of four years prior to making any decisions as to whether the AQMA remains or could be un-declared.

St Pancras AQMA

Air quality monitoring at St Pancras continues to measure non-compliance with the Annual Mean Standard for Nitrogen Dioxide and air quality modelling suggests borderline compliance at 2025. Nevertheless the model performance issues described above make us more reliant on the monitoring data for this site.

The 2019 - 2020 monitored annual mean for NO₂ was 42µgm⁻³.

Required Reduction in Emissions for St Pancras

DEFRA Guidance suggests that AQAPs contain an estimate of the reduction in emissions necessary to deliver compliance with the AQS should be presented in AQAP's.

The monitoring and modelling data described above shows that only the air quality at St Pancras, Chichester is currently non-compliant and is predicted to be non-compliant until 2025. As such it is only necessary that CDC calculates the reductions in emissions necessary to achieve the AQS for St Pancras, Chichester as all other locations are already compliant, albeit for the case of Rumbolds Hill the compliance is borderline.

The calculation for the reduction necessary at St Pancras, Chichester is presented³² at Appendix 4 and is calculated as 7.2% decrease in road NO_x emissions based on the 2019 diffusion tube measurement made at St Pancras of 42µgm⁻³ and allowing for a background concentration of 13.87µgm⁻³ as NO_x. This is the reduction in NO_x emissions necessary for the air quality at St Pancras to become compliant with the relevant Air Quality Standard (ie 40µgm⁻³ stated as an annual mean NO₂ concentration). The necessary road NO_x reduction is useful in the context of the scenario modelling reported above which predicts what is achievable through improved emissions from buses and from transferring car journeys to walking and cycling ('Smarter Choices'). There are many other sources of NO_x and although it was not possible to model these they remain important in seeking to reduce ambient pollution. The private licensed hire fleet and hackney cabs are such an example.

16. The Way Forward

Traffic is the dominant source of local air pollution for Chichester and Midhurst (where our AQMAs are located) and so our overall focus is on measures that tackle transport emissions. We are aware that road transport plays a vital role in all of our lives and so the overall approach here is not anti-car but more pro-choice, leadership and fostering change. Like many complex problems there is no single solution but more the aggregation of marginal gains from many measures to assist in tackling the issue. Our priorities should simultaneously assist in tackling climate change/greenhouse gas emissions as we recognise that the two issues of poor air quality and climate change are highly interrelated.

Whilst our AQMAs are all discreet locations in Chichester and Midhurst the effect of air quality actions should be beneficial in tackling air pollution and climate change gases in all locations.

17. Conclusions and recommendations from the Monitoring and Modelling

- Move to undeclare Orchard Street and Stockbridge A27 Roundabout AQMAs,

³² The calculation is made in accordance with DEFRA Guidance TG(16), page 7-35, Box 7.6.

- decommission the real-time air quality monitoring station at Orchard Street,
- maintain a watching brief for St Pancras and Rumbolds Hill AQMAs,
- maintain a watching brief for all other locations of interest including; The Hornet, Whyke, A27 roundabout and Oving Road cross-roads,
- decommission the real-time ozone monitoring station at Lodsworth and
- develop on-going actions to continue to tackle the remaining issues.

18. Air Quality Actions - Key Themes

Theme 1: Support for development of sustainable transport measures

A wide range of measures are required to support the development of alternative low emission and low carbon transport, including transport management measures and investing in public transport infrastructure. Many of these measures will be developed in partnership with the WSCC as the Transport Authority.

- We will continue to develop our LCWIP.
- WSCC are in the process of considering how they will roll out EV charge points largely for households who do not have the benefit of off-street parking. This work is in conjunction with district and borough councils and we will consider CDC's position with regard to this work once the full details are known.
- We will continue to seek monies for the delivery of sustainable transport related projects.
- We will support progression of the programme of projects identified by WSCC through the Chichester Area Sustainable Transport Package.
- Consider the implementation of secure bike parking in relevant locations.
- Consider the introduction of bike hire schemes.
- Consider cargo bikes to reduce last-mile delivery emissions and cargo consolidation

Theme 2: Support for the uptake of low and zero emission vehicles

This will look at measures such as low emission vehicle infrastructure development to encourage the uptake of electric and other low emission vehicles. This theme will also cover low emissions behaviours such as eco-driving and anti-idling policies.

To foster change towards zero emission vehicles we will:

- Work with WSCC and bus operators to encourage reductions in bus emissions, support the tightening of emissions standards in contracted services and explore funding opportunities to reduce bus emissions.
- Work with the council's taxi licensing team and wider partners to deliver infrastructure that will support the electrification of hackney cabs and private hire vehicles.
- Work with WSCC and local businesses to explore the development and implementation of a local fleet recognition scheme³³.
- Promote the uptake of EVs by working with our partners to install EV charging infrastructure³⁴.

³³ One such scheme is Eco-stars <https://www.ecostars-uk.com/>

- Continue to develop ULEV and ZEV vehicles in our own fleet.
- Work to deliver a pilot pool car fleet for CDC to include ULEV and ZEV vehicles.
- Promote the development of ULEV and ZEV car clubs across the district.
- Promote the understanding of EVs for businesses in the district
- Seek to understand the impact of ZEVs on air quality in Chichester and Midhurst.

Theme 3: Planning for sustainable transport

New development provides the opportunity to support sustainable transport both through the form of the development and new infrastructure. This provides the opportunity to use Community Infrastructure Levy (CIL) and Section 106 agreement funding to support wider sustainable and low emission transport projects.

We will seek to strengthen the use of the planning system to further reduce transport emissions as follows:

- Ensure that air quality assessments for new development are appropriate and robust.
- Work with our planning policy team to incorporate robust policies and supporting documentation that encourage the delivery of development that considers and responds to air quality issues and challenges.
- Explore policy measures that require developers to provide investments in and contributions to the delivery of low emission transport projects and measures to off-set emissions both on and off of development sites.
- Seek to associate a GIS layer of aspirational walking and cycle routes with a sustainable transport policy in the Revised Local Plan. The GIS layer will contain routes from CDC and WSCC's LCWIPs as well as schemes described by WSCC's Sustainable Transport Package and Local Transport Infrastructure Plan.
- WSCC are in the early stages of rewriting the West Sussex Transport Plan. In conjunction with Sussex-air we will seek to embed air quality policy and considerations within that document and the policies therein.

Theme 4: Managing the Council's own transport emissions

The Council must lead by example by reducing emissions from our own transport activities with regards to fleet vehicles, business travel and contracted transport services and deliveries.

- We will continue to work to implement our policy that 'all new council cars and vans shall be electric unless there is a business case as to why not'.
- Continue to assess our fleet in terms of mileage management and efficient routing of vehicle movements.
- Tackle CDC grey-fleet mileage through delivery of an ULEV and EV pool car fleet for staff business mileage with a view to expanding the fleet after evaluation of the pilot project.
- Encourage staff travel to and from work to be by the most sustainable means through the provision of the Easit scheme and offering the staff benefit of vehicle leasing which most encourages the take up of EVs.

³⁴ CDC currently has a watching brief for the installation of EV charging points where we are monitoring the usage statistics of our current network before they suggest that further installations should be considered.

- Deliver a small fleet of electric bikes equipped such that staff can make work related journeys on them.

Theme 5: Developing partnerships and public education

By working with key stakeholders we can consider partnerships to share resources and develop wider strategies to deliver greater benefits. We believe that there is the willingness by the public to engage in actions to reduce emissions and CDC relies on partnerships to widen it's reach and the possibility of success.

To foster a partnership approach and target our messaging we will:

- Write a communications plan for air quality.
- Consider anti-idling campaigns at locations such as railway level crossings, school gates and bus/coach-stops³⁵.
- Work with WSCC to promote the incorporation of stop / start technology on buses.
- Continue to be an active member of the pan-Sussex Sussex-air group of local authorities and academics.
- Continue to attend and participate in any WSCC hosted working groups.
- Continue to attend the Chichester and District Cycle Forum.
- Continue to support the Sussex-air 'Air-alert' pollution warning system.
- Consider invites to new partnership meetings with relevance to transport emissions.
- In partnership with WSCC consider support for Play Streets

Theme 6: Miscellaneous projects

In speaking to councillors and other key interested parties we have received many ideas as to how we might improve air quality.

- Consider declaring Smoke Control Areas which would allow for regulatory oversight for the quality of firewood and stoves being sold. This mainly relates to tackling particulate emissions.
- To include in the Communications Plan for Air Quality a specific thread on domestic burning, bonfires, fire-pits, open-fires and wood burners.
- Greening the council's procurement policy. In procuring goods and services the council must demonstrate 'best value' in its use of public money. Nevertheless 'green' related considerations can be considered through the quality considerations of procurement.
- Consider green walls and tree planting to help improve air quality.

19. Priorities for Action

The following tables expand on the broad ideas for actions as set out above. Proposed actions are highlighted together with those which are already in progress and/or partially delivered. The majority of all air quality actions for all authorities are subject to funding. As such our list of actions is not prioritised. In our experience the implementation of air quality action is driven by the

³⁵ Where buses and/or coaches might sit idling for extended periods.

availability of external grant monies which do not accord with locally set priorities. Once this Plan is adopted then the inclusion of the actions as described below facilitate the Council to seek grant money as and when relevant monies become available. The Council has had some success in accessing grant monies and so we believe that progress toward delivery of the actions below, over the Plan period, is realistic and deliverable.

Notwithstanding the above the modelling (summarised at 12 above) points to the importance of upgrading the Euro standard of the buses and the continued development and expansion of our LCWIP remain of the highest importance to take forwards as finance allows.

Note: monitoring air quality is not mentioned in the action planning tables as below. Nevertheless, subject to the changes suggested in the pages above, air quality monitoring will continue across the district across the period of the AQAP.

Key Priority Area	Measure	Lead Authority	Planning Phase	Implementation Phase	Key Performance Indicator	Target Pollution Reduction in AQMA	Progress to Date	Estimated Completion Date	Associated Benefits	Chichester (C) and/or Midhurst (M)
Support for development of sustainable transport measures	Continue to develop the Chichester City LCWIP	CDC, partnered by WSCC	on-going	2021 - 2031	Schemes bought forward to feasibility studies, detailed design and implementation. Further LCWIP developed for Midhurst. Inclusion of LCWIP schemes in CDC Local Plan Revision.	Modal-shift NOx reductions estimated in Air Quality Modelling Report	Draft GIS layer of schemes completed.	on-going	Tackles carbon emissions and promotes public health and wellbeing.	C & M
	Roll-out of EV charging for homes without the benefit of off-street parking.	WSCC in partnership with all DnBs and potentially CDC	on-going	2021 - 2026	CDC to consider whether to be part of WSCC's approach to delivery once WSCC's approach is defined.	NOx reduction not estimated but	Considered at Environment Panel and Cabinet	on-going	Tackles carbon emissions too	C & M
	Seek monies for sustainable transport projects	partnered and supported by WSCC and Sussex-air	on-going	2021 - 2026	Grant monies won	NOx reduction not estimated	Various grant awards during the 2015 AQAP period	on-going	Likely to tackle carbon emissions too	C & M
	Secure bike parking in relevant locations	CDC partnered by WSCC and possibly Southern Rail	on-going	2022 - 2026	Installation of secure bike parking facilities	NOx reduction not estimated	None	on-going	Encourages cycling and active lifestyle with co-benefits for physical and mental health	C & M
	Bike hire schemes	CDC in partnership with WSCC	on-going	2021 - 2026	Installation of bike hire scheme(s)	NOx reduction not estimated	Various discussions with providers	on-going	Encourages cycling and active lifestyle with co-benefits for physical and mental health	C & M
	Cargo bikes for last mile and city centre deliveries	CDC in partnership with WSCC and BID etc	on-going	2022 - 2026	Purchase cargo bike	NOx reduction not estimated	None	on-going	Fosters behavioural change by setting an example	C & M

Support the uptake of zero emission vehicles	Upgrade as high a proportion as possible to zero emission and to expedite / facilitate the process or as a minimum to Euro VI	WSCC with CDC and potentially Sussex-air providing air quality support	on-going	2023 - 2026	Number of buses upgraded to Euro VI	Nox reduction targets estimated in Air Quality Modelling Report.	Approaches made to bus companies via Sussex-air under the previous AQAP. WSCC are aware of the Air Quality Modelling.	on-going	Climate change benefits too	C & M
	Improve emissions standards for CDC's Taxi Licensing Standards	CDC	Jan-21	2021	Improved emissions standards, maximum age for vehicles entering the fleet and possibly early review of the policy as EVs achieve greater market penetration	Insufficient data available to enable modelling	Discussions between CDC Licensing, Climate Change and Environmental Protection Team	2021	Climate change benefits too	C & M
	Work with WSCC and local businesses to explore the development and implementation of a local fleet-recognition scheme	CDC, WSCC	on-going	2023 - 2026	Launch of scheme and fleet operators becoming members of the scheme	NOx reduction not estimated	Discussions at Sussex-air	2023 - 2026	Climate change benefits too	C & M
	Deliver EV charging points at locations that will enable taxis to transfer to EV technology	CDC, WSCC	on-going	2024 - 2026	Grant and/or EV charge points in relevant locations	NOx reduction not estimated but potentially significant	Early discussions with CDC Licensing Team and at Sussex-air. A relevant grant might facilitate such action.	2024 - 2026	Climate change benefits too	C & M
	Promote development of ULEV and EV car clubs across the district	CDC potentially pertnered by WSCC	on-going	2023 - 2026	Expansion of existing (6 car) car club, both geographically and by number of vehicles	NOx reduction not estimated	CDC currently funded for one additional car club vehicle	on-going	Members of car clubs demonstrably use alternative modes more often. CC benefits too	C & M

Support the uptake of zero emission vehicles	Promote the understanding of EVs for businesses	CDC, WSCC, BID, Chamber of Commerce etc	on-going	2021 - 2026	Inclusion within Comms Plan and roll-out.	NOx reduction not estimated	None	on-going	Wider air quality and CC benefits	C & M
	Seek to understand the impact of EVs on AQ in Chichester and Midhurst	CDC, WSCC	As required	2021 - 2026	Continued monitoring in the AQMAs and environs and possible additional modelling.	Not applicable	Existing modelling provides some insight into the impact of mode shift and Euro VI buses	As required	Enhanced understanding of AQ impacts of EVs	C & M

Planning for Sustainable Transport	AQ assessments for planning applications	CDC	on-going	2021 - 2026	Planning applications considered for the air quality impact on them or the predicted air quality impact from them	NOx reduction not estimated	On-going consultation for proposed development as it passes through the DM system	on-going	Assists in designing out air quality impacts	C & M
	Inclusion of air quality related policy in the Revised Local Plan	CDC	2021	From Revised Local Plan adoption onwards	Relevant policy in the Local Plan Review. Possibly includes Sussex-air's Low Emissions Guidance being associated with the Local Plan Revision	Not broadly applicable	Discussion between Environmental Protection and Planning Policy Team	2022	Assists in including air quality considerations in future planning decisions.	C
	Embed a GIS layer of walking and cycling routes in the Local Plan Revision	CDC with significant input from WSCC	2021	From Revised Local Plan adoption onwards	GIS layer embedded in the Revised Local Plan	Modelling estimates NOx reduction associated with 2% and 5% modal-shift	Discussion between Environmental Protection and Planning Policy Team. Early draft GIS layer	2022	Fosters delivery of walking and cycling routes with AQ, CC and public health benefits	C
	Review of on-street parking arrangements in Midhurst	WSCC, CDC	on-going	Subject to funding	Bid for grant suitable for funding such an approach	NOx reduction not estimated	email exchange between relevant partners only	on-going	Encourages alternative modes to access retail and town centre	M
	Inclusion of air quality policy in the revised Local Transport Plan (LTP3)	Sussex-air, CDC and all other West Sussex DnB's	2021	2023	Inclusion of air quality policy	NOx reduction not estimated	Early discussions with WSCC	2023	Includes air quality considerations in Transport Planning decisions.	C & M

Managing the Council's own transport emissions	Continue to implement the Council's policy that 'all replacement cars and LGVs will be electric unless there is a business case as to why not'	CDC	on-going	2025 - 2026	Growth in the number of EVs in the CDC fleet (currently 2)	NOx reduction not estimated	Policy and exception reporting in place. CCS actively exploring greater integration of EVs into the fleet	on-going	Climate change benefits too	C & M
	Deliver a pool car fleet for CDC staff to utilise on work related journeys	CDC	Jan-2021 - April 2021	2021 - 2022	Two pool cars available for staff use, one of which is EV and a double-socket charge point to support	NOx reduction not estimated	Internal working group proceeding to delivery	2021 - 2022 (potential expansion after evaluation)	Climate change benefits too	C & M
	Encourage staff green travel for all journeys both private and work related through provision and promotion of Easit scheme	CDC	Complete	on-going	Numbers of staff joining Easit and making journeys using Easit discounts (monitored through travel claims)	NOx reduction not estimated	Implemented	annual renewal	CC, social and AQ benefits	C & M
	Provide a small fleet of suitably equipped ebikes for staff to use for local work related journeys	CDC	2021	2021 - 2022	Miles displaced to ebikes / expansion of the number of e.bikes	NOx reduction not estimated	Part of staff travel group post Covid recovery work. Budget identified	2021 - 2022	Reputational, CC, health and AQ benefits	C
	Continue to assess CCS fleet in terms of route optimisation using software	CDC	2021	2021 - 2022	Implementation of waste collection routes designed by software. Reduced mileage for waste collection vehicles	NOx reduction not estimated	Software purchased and being implemented	2022 - 2023	Reduced fuel costs for CDC	C & M

Developing partnerships and public education	Produce a communications plan for air quality	CDC	2021 - 2022	2022 - 2026	Tweets, Facebook posts and newspaper articles on the subject of air quality	Nox reduction not estimated	Highlighted with CDC PR	2022
	Deliver anti-idling campaigns in targetted locations	CDC in partnership with WSCC	2021 - 2022	2022 - 2026	Number of campaigns delivered and count of interactions with customers	NOx reduction not estimated	None	2022 - 2026
	Continue to participate in Sussex-air	WSCC and Adur and Worthing	on-going	2021 - 2026	Attendance at meetings	Not applicable	CDC has attended the group regularly	on-going
	Support Air-Alert	Sussex-air	on-going	2021 - 2026	Include link to airAlert on website	Not applicable	Implemented/ongoing	on-going
	Contribute to a new local business 'Easit' group	CDC, WSCC, BID, Chamber of Commerce etc	2021	2021 - 2026	New group set-up and meetings convened	Nox reduction not possible to estimate	Discussed with WS NHS and agreement in principle	2021

Support for development of sustainable transport measures	Continue to develop the Chichester City LCWIP		on-going	2021 - 2031				on-going		C & M
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Miscellaneous projects	Consider declaring Smoke Control Areas	CDC	2022	2023	Smoke Control Zones declared	Non-AQMA related action. This action is targetted at particulate (PM10 and PM2.5 emissions)	None	2023	Educates public regarding the health risk from solid fuel burning both in wood burners, open grates, bon fires and fire pits. CC and AQ issue	C
	Tree/shrub planting and/or 'green-walls' to improve air quality	CDC	2021	2021 - 2023	Number of trees/walls planted	Non-AQMA related action. There is inadequate room in all existing AQMAs to plant trees and doing so might make air quality worse	Tree Officer employed in the climate change team	2024	Wellbeing from aesthetically 'softened' urban settings, minor AQ benefits, mainly CC benefits	C
	Promote use of the car parks	CDC	2022	2022 - 2024	Local campaign to encourage use of CDC car parks to minimise parking on North Street	Nox reduction not possible to estimate	None	2024	Potentially smoother traffic flow	M
	Consider the use of on-street parking for a Low Traffic Neighbourhood type approach	CDC, WSCC	2023	2024	Discussion with WSCC/ implementation	Nox reduction not possible to estimate	None	2024	Fostering modal shift	C/M

Development and Implementation of Chichester District AQAP

In developing this draft for consultation AQAP, we have worked with the local authorities across East and West Sussex, the Environment Agency, to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 13 below.

Table 13: Statutory consultees for the AQAP:

Consultee:
The secretary of State
The Environment Agency
The Highways Authority
All neighbouring local authorities
Other public authorities as appropriate
Bodies representing local business interests and other organisations as appropriate

The response to our consultation stakeholder engagement is given in Appendix 1.

Glossary of terms

Abbreviation:	Meaning:
AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQO	Air Quality Standards and Objectives contained in the UK Air Quality Regulations
Canyonised	A street where the buildings are tall in relation to its width
CDC	Chichester District Council
DEFRA	Department of Environment, Food and Rural Affairs
DfT	Department for Transport
ERG	Environmental Research Group (part of King's College London)
EU	European Union
Imperial	Imperial College London
IPPC	Integrated Pollution Prevention and Control
LAQM	The Local Air Quality Management regime
LEP	Local Enterprise Partnership
LTP	Local Transport Plan
Modal-shift	Changing transport modes to greener modes
NO ₂	The pollutant Nitrogen dioxide
NOx	The pollutant 'family' Oxides of Nitrogen
OLEV	Office for Low Emission Vehicles (part of DfT)
PM ₁₀	Particulate matter smaller than 10µm in diameter
PM _{2.5}	Particulate matter smaller than 2.5µm in diameter
PPB	Parts per billion
WSCC	West Sussex County Council

Appendix 1: Response to Consultation

Please note this section will be completed post- the public consultation and will include a summary and analysis of the consultation responses received.

Appendix 2: Reasons for Not Pursuing Action Plan Measures

Table xx: Action Plan Measures Not Pursued and the Reasons for that Decision

Table 14: Action Plan Measures Not Pursued and the Reasons for that Decision:

Action Category	Action Description	Reason Action is not being pursued (including Stakeholder views (WSCC Highways))
Sustainable transport	Provision of electric scooter hire	escooters are not yet legal on the Highway (including the footway). Some of Midhurst's pavement is unsuitable for escooters (features cobbles).
Reviewing parking charges	Differential parking charges to favour EVs	EVs are no longer a novel product and are predicted to reach price point parity within two years. No market subsidy in the form of parking charges is required to now ensure their success. CDC has previously provided free parking and electricity at two 3kW charge points which in 2017 led to complaints about access to the EV charge points (demand out-stripped supply).
Sustainable Transport	Expand North Street car park behind North Street.	It is not clear that this would have any significant benefit for air quality.
Highways improvements	Traffic lights at either end of Rumbolds Hill	Potential significant concerns due to knock on impacts on traffic congestion/queuing in Midhurst due to inter-green time for traffic held across at least 3 if not 4 arms of the roundabout (depending on approach to accessing West St)
Highways improvements	Widening pinch point on Rumbolds Hill - Nat West Bank currently vacant.	Un-realistic and over-scale for the AQAP especially as air quality is predicted to achieve compliance.
	Re-routing of large HGV's away from A272.	A272 is part of the West Sussex advisory lorry route network as it is the most appropriate route of those available for HGV movements in the area.

Appendix 3: Rumbolds Hill, Air Quality Management Area

Ideas for inclusion in the Air Quality Action Plan for Midhurst (Chichester District):

CDC officers attended the Midhurst Vision Group and discussed the AQAP for Midhurst with individual CDC and WSCC councillors and SDNPA officers. Ideas harvested from both those meetings and related correspondence were discussed with WSCC. The resulting air quality actions are listed as below:

1. Car-sharing / car-club
2. Ongoing development and delivery of Midhurst Greenway
3. Promote use of the car parks
4. Employ a traffic consultant to review Rumbolds Hill and Midhurst High Street (for; goods deliveries, potential for cycling on North Street, novel use of space to better manage delivery traffic, placement of street furniture to discourage parking in selected locations, short-term parking on Church Hill by TRO, Review pedestrian crossings' timing and sequencing, retractable bollards on North Street to prevent people parking in delivery bays, Make Church Hill junction left in left out only and a signed priority system at Rumbolds Hill.
5. Further develop the SDNPA LCWIP for Midhurst (including Jubilee Path informal crossing)
6. Anti-idling campaigns
7. Review parking charges
8. Increase parking enforcement
9. Active travel plan for Midhurst
10. Encourage the use of electric vehicles, cycling and walking

Ideas proposed by the group but rejected for inclusion in the Air Quality Action Plan:

Suggestion:	Reason for being rejected for inclusion in the AQAP:
To completely remove all car parking in North Street and only allow deliveries.	Would potentially pose issues for persons with mobility issues.
Creation of a town bypass.	Over-scale for the AQAP.
Expand North Street car park behind North Street.	It is not clear that this would have any significant benefit for air quality.
Traffic lights at either end of Rumbolds Hill	Previously rejected by WSCC Highways.
Widening pinch point on Rumbolds Hill - Nat West Bank currently vacant.	Un-realistic and over-scale for the AQAP.
Re-routing of large HGV's away from A272.	Previously rejected by WSCC Highways.
Permissive walking route through Cowdray to connect Easebourne to Midhurst.	This idea requires discussion with the land-owner before it is to be included in a public document. Nevertheless the idea has some merit.
e.scooter hire.	escooters are not yet legal on the Highway (including the footway)
More parking enforcement.	Beyond the scope of the AQAP. Idea forwarded to CDC Parking Services. This is more of a Parking policy issue.
Parking charge amendments to encourage people to park their cars in the car parks and not on North Street.	Idea forwarded to CDC Parking Services. This is a Parking policy issue.

Appendix 4: Calculation to determine the Road NO_x Emission necessary to achieve compliance at St Pancras, Chichester:

The calculation is made in accordance with the guidance: DEFRA, Local Air Quality Management, Technical Guidance (TG16), April 2016, page 16, Box 7.6 (note the method deviates from the TG(16) but was confirmed by the LAQM Helpdesk 25-11-2020):

Calculation for 2018 NO₂ diffusion tube result:

Converting the 2018 diffusion tube measurement of 45µgm⁻³ NO₂ to its equivalent NO_x value $\equiv 72.93\mu\text{gm}^{-3}$ NO_x ('Road-NO_x-Current').

NO_x background concentration = 13.87 µgm⁻³ from DEFRA Background maps (using the nearest grid reference to St Pancras, Chichester).

The 'Road-NO_x-Required' value is calculated as 60.95µgm⁻³.

The target reduction is then calculated as:

Road-NO_x-Current – Road-NO_x-Required ie $72.93 - 60.95 = 11.98 \mu\text{gm}^{-3}$ or stated as a percentage reduction $11.98/72.93 * 100 = 16.4\%$ decrease.

Calculation for 2019 NO₂ diffusion tube result:

Converting the 2019 diffusion tube measurement of 42µgm⁻³ NO₂ to its equivalent NO_x value $\equiv 65.58\mu\text{gm}^{-3}$ NO_x ('Road-NO_x-Current').

NO_x background concentration = 13.87 µgm⁻³ from DEFRA Background maps (using the nearest grid reference to St Pancras, Chichester).

The 'Road-NO_x-Required' value is calculated as 60.88µgm⁻³.

The target reduction is then calculated as:

Road-NO_x-Current – Road-NO_x-Required ie $65.58 - 60.88 = 4.7 \mu\text{gm}^{-3}$ or stated as a percentage reduction $4.7/65.58 * 100 = 7.2\%$ decrease

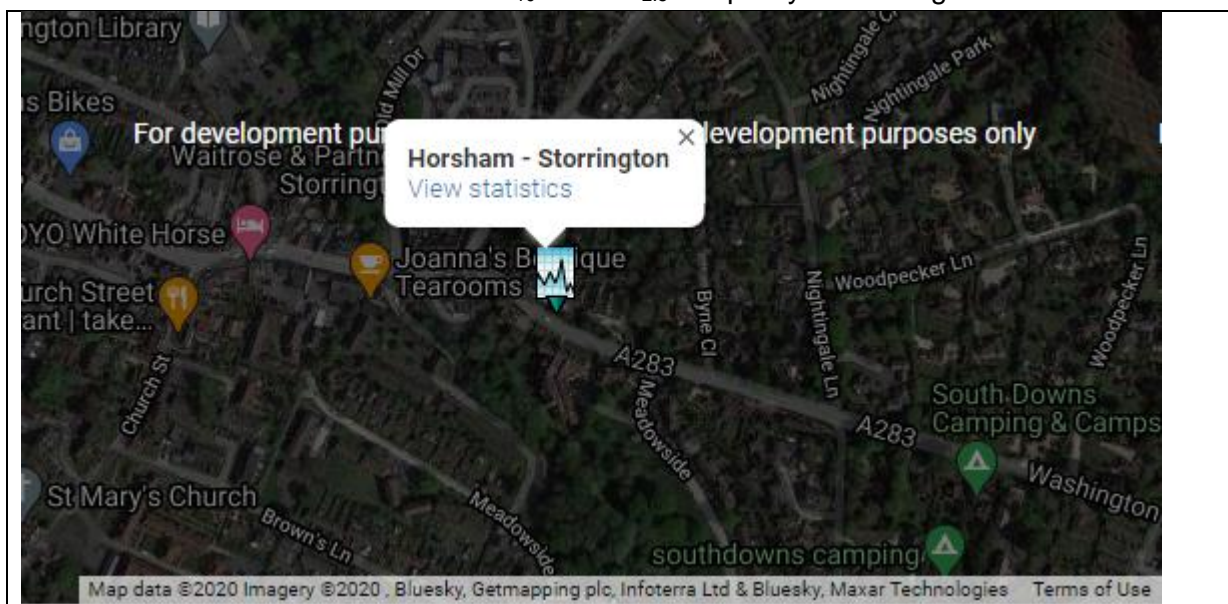
The calculations behind the numbers presented here are carried out on a spreadsheet provided by DEFRA.

Appendix 5: Calculation to estimate PM_{2.5} concentrations in Chichester District:

The calculation is made in accordance with the guidance: DEFRA, Local Air Quality Management, Technical Guidance (TG16), April 2016, page 7-36, Box 7.7:

The nearest PM_{2.5} and PM₁₀ air quality monitoring station of which we are aware is in Horsham District Council's Area at Storrington (Location shown in Plan xx below):

Plan xx: Horsham District Council PM₁₀ and PM_{2.5} air quality monitoring location:



The TG(16) methodology allows us to apply the ratio between PM_{2.5} and PM₁₀ at Storrington to the Chichester PM₁₀ data to estimate the PM_{2.5} concentration at CDC's air quality monitoring station (ie CDC's Stockbridge air quality monitoring station derived PM₁₀ concentration). The method applied where all values are as annual-mean concentrations.

Horsham District Council has provided monitoring data from their Storrington air quality monitoring station (the nearest to Chichester) in Table xx below:

Table 15: Horsham air quality monitoring data (PM₁₀ and PM_{2.5} only):

Year:	Annual mean PM _{2.5} concentration (µgm ⁻³):	Annual mean PM ₁₀ concentration (µgm ⁻³):	PM _{2.5} /PM ₁₀ ratio
2016	13.2	18.8	0.70
2015	11.2	15.8	0.71
2014	11.3	N/A	N/A
2013	16.6	23.0	0.72
2012	16.2	20.6	0.79
2011	15.6	22.4	0.70
2010	14.5	20.4	0.71

The Horsham DC monitoring station was shut-down after 2017 and so there is no more recent data than presented above. TG(16) allows a generic factor of 0.70 to be used to estimate PM_{2.5} annual mean concentrations from PM₁₀ annual mean concentrations. In any case it is observed that the TG(16) factor is remarkably similar to the 2013 to 2016 factors derived from Horsham DC's data.

The ratios are then applied to CDC's PM₁₀ monitoring data from the Stockbridge air quality monitoring station in order to estimate the PM_{2.5} concentrations in Chichester District at Stockbridge. Note Stockbridge air quality monitoring station is considered to be a worst-case location for air quality monitoring given it's proximity to the A27 and related volume of traffic.

Table 16: Estimated PM_{2.5} concentrations at Stockbridge A27, Chichester:

Year:	Monitored annual mean PM ₁₀ concentration (at Stockbridge A27 AQMS) (µgm ⁻³):	PM ₁₀ to PM _{2.5} conversion factor ^a :	Estimated annual mean PM _{2.5} concentration (µgm ⁻³):
2019	19	0.70	13.3
2018	18	0.70	12.6
2017	19	0.70	13.3
2016	20	0.70	14.0
2015	21	0.71	14.9

^a 2019, 2018 factors are from TG(16), page 7-36, paragraph 7.109; 2015 to 2017 factors are derived from Horsham DC data as detailed above.

References:

Air Pollution and Street Play 2017, Playing Out
Annual Status Report 2020
Breathing Better; a partnership approach to improving air quality in West Sussex, May 2018
Chichester Air Quality Action Plan Review – 2020, Report 1: Baseline modelling update (2020), August 2020
Chichester Air Quality Action Plan Review – 2020, Report 2: Scenario modelling, August 2020
LAQM PG(16), DEFRA
LAQM TG(16), DEFRA
West Sussex Transport Plan

Chichester District Council

Cabinet

4 May 2021

Review of the Allocation Scheme for Social and Affordable Housing

1. Contacts

Report Author

Ivan Western – Housing Delivery Manager

Telephone: 01243 534582 E-mail: iwestern@chichester.gov.uk

2. Recommendations

- 2.1 That the Cabinet approves the Allocation Scheme for Social and Affordable Housing as set out in Appendix 2.
- 2.2 That the Cabinet authorises the Director for Housing and Communities, following consultation with the Cabinet Member for Housing, to make minor changes to the scheme in response to statutory requirements or as otherwise required to maintain operational effectiveness.
- 2.3 That Officers undertake a further review of the Rural Parish Connection and bring forward proposals for further changes if considered necessary.

3. Background

- 3.1 The Council administers a *Housing Register* which is used as the basis for the allocation of social housing in the District. Key elements of the Housing Register, including the definition of groups to whom ‘*reasonable preference*’ in the allocation of housing must be given, are prescribed by law, but within this framework the Council has a considerable degree of latitude to frame policies which meet its local priorities. We are required to keep our scheme under regular review.
- 3.2 At its meeting in September 2020 Overview and Scrutiny Committee established a Task & Finish Group to oversee a review of the Housing Register with the intention of making recommendations on ways in which the process could be improved.
- 3.3 The T&F Group met twice in November 2020 and January 2021 and its recommendations were subsequently considered at Overview and Scrutiny Committee on 26th January.
- 3.4 The scheme has now been revised and rewritten and is set out in full in Appendix 2, with a summary of changes at Appendix 1.

4. Outcomes to be Achieved

- 4.1 The overriding purpose of the review is to make sure that the Council makes optimal use of the limited supply of social and affordable rented homes which are available.

4.2 Underpinning this, the Review highlighted several key principles which our scheme needs to satisfy, namely the need to:

- Meet the Council's statutory requirements
- Operate fairly and transparently
- Make it easy for service users to access and use the system
- Allow for efficient administration
- Enable Registered Providers to let empty homes quickly
- Allocate homes in ways which support the maintenance of sustainable communities.

4.3 The Review also recognises the specific role of Registered Providers whose homes are let through the Housing Register; the need to take on board their views, as well as the views of other stakeholders in the implementation of change.

5. Proposals

- 5.1 Proposals for change involve a number of different areas. The first of these is **eligibility** for the Housing Register, specific changes are recommended to the income and savings thresholds for applicants and the criteria used to exclude applicants who have been convicted of criminal behaviour or serious breaches of tenancy conditions. The need for a **Local Connection** to Chichester District is a key element of our scheme as is, in some cases, a connection to a rural parish. The recommendations involve some minor changes to the way this operates which includes removing the need for a rural parish connection for new housing built as part of 'strategic housing developments'.
- 5.2 The system of **priority bands** lies at the heart of the allocation scheme, the key change proposed in this part of the policy involves a more targeted approach to assisting certain categories of applicant who require specific assistance. This would be based on awarding additional priority, to specific applicants as part of a managed 'move on' pathway from supported housing. This will make it easier to rehouse applicants such as rough sleepers, care leavers and victims of domestic abuse who typically may be resident in supported housing prior to seeking a settled home through the Housing Register.
- 5.3 A number of **operational changes** to the way the application and bidding process is managed are suggested. This includes the abolition of set time limits for bidding for some categories of applicant, a facility to suspend applicants bidding in appropriate circumstances and to let properties directly, without advertising in specified circumstances. The recommendations also provide for greater use of **discretion** to be delegated to the Divisional Manager in exceptional circumstances.
- 5.4 Clearly any changes to the way homes are allocated results in some applicants being prioritised at the expense of others. The aggregate effect of these changes is very difficult to determine. At a 'micro' level the effect should be that the pathway from supported housing to long term social housing should become easier. At a 'macro' level this should mean that the number of people moving through supported housing services increases, benefitting more people.

6. Alternatives Considered

- 6.1 A limited review of other Councils' housing allocations schemes has taken place and specialist advice sought from a former Government adviser on housing allocations. Particular consideration has been given to two key issues; namely the prevention and reduction of homelessness and the approach to allocation of housing in rural parishes.
- 6.2 With a finite number of properties available councils need to strike the right balance between allocating homes to homeless households in temporary accommodation, as opposed to others who are inadequately accommodated in the private rented sector or with friends or family. Whilst there is a financial incentive to reduce use of temporary accommodation, thus prioritising allocations to homeless households, there is a risk of creating a 'perverse incentive', by establishing temporary accommodation as the quickest route into affordable housing. Whilst some authorities give greater priority to statutorily homeless households, the recommendation is for CDC's approach to manage the majority of homelessness applications within Band C. This approach maintains a degree of parity between those in temporary accommodation and others who are overcrowded or living in unsatisfactory accommodation in the private sector. Notwithstanding this, additional provision is suggested within the policy which allows us to accelerate the priority for households in temporary accommodation where there are compelling reasons to do so.
- 6.3 A more particular issue for Chichester as a large rural district, is the approach to letting homes within rural parishes. Our existing policy gives a considerable degree of priority to local people with housing needs when properties in rural parishes are advertised. There are sound reasons for this but the application of these rules is complicated to administer and in practice only comes into play relatively infrequently. In some cases the policy may also have unintended consequences since it may discourage applicants for bidding for properties for rural properties for which demand is relatively low (e.g. in comparison with a property within the City of Chichester for example). Some consideration has been given to revising the current system by:
- Limiting the application of the policy only to those more rural parishes further from Chichester or the coastal plain
 - Extending the application of rural preference to include Band D applicants, thus increasing the potential for local lettings
 - Exercising rural preference only within Bands, so that a local applicant in Band C would only have preference over other applicants in the same Band, as opposed to over all non-local applicants as at present.
- 6.4 Whilst there are good arguments for considering such changes in the future, it is suggested that a more detailed review drawing on analysis of the scheme in practice and involving appropriate consultation, should be carried out. For the time being it is recommended that this element of the scheme remains largely as it is; with the exception of a modest redefinition to exclude lettings within larger 'strategic' developments which are currently subject to the rural allocation policy. As such, lettings of new affordable homes on sites such as Shopwhyke Lakes would be equally available to applicants from all parts of the District.

7. Resource and Legal Implications

- 7.1 There are no direct budgetary implications from these changes, nor any specific implications for IT or staffing.
- 7.2 The thrust of changes proposed should facilitate housing applicants placed in private temporary accommodation more quickly. This in turn should help to reduce the cost of temporary accommodation.

8. Consultation

- 8.1 Consultation has taken place with various parties in relation to specific aspects of the scheme.
- 8.2 West Sussex County Council has provided specific feedback in relation to proposals for young people and in relation to the allocation of tenancies in Extra Care Housing schemes within the District.
- 8.3 Hyde Housing and other Registered Providers have welcomed proposals to encourage applicants to bid carefully and to reduce the number of refusals and 'no responses' when applicants bid successfully.

9. Community Impact and Corporate Risks

- 9.1 One of the key risks involves the need to manage the number of homeless households being placed in temporary accommodation. The ability to provide move on options for homeless households into long term housing through the Housing Register is the principal means of managing this demand and thus controlling the cost of temporary accommodation.

10. Other Implications

Are there any implications for the following?		
	Yes	No
Crime and Disorder		x
Biodiversity and Climate Change Mitigation		x
Human Rights and Equality Impact	x	
Safeguarding and Early Help	x	
General Data Protection Regulations (GDPR)	x	
Health and Wellbeing	x	
Other (please specify)		

11. Appendices

Appendix 1: Summary of principal recommendations, including those recommended by the Task and Finish Group and Overview and Scrutiny Committee or made as a result of consultation with Stakeholders

12. Background Papers

12.1 The following sources of statutory guidance are relevant:

- [Improving access to social housing for members of the Armed Forces](#)
- [Improving access to social housing for victims of domestic abuse](#)
- [Allocation of housing: statutory guidance for local authorities \(MCHLG, January 2021\)](#)

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Appendix 1. Housing Register and Allocation Scheme: Principal Recommendations

Current Policy	Proposed Changes	Rationale for Change or Retention
1. Eligibility for the Housing Register: By law several categories of applicant who are subject to immigration control or who are not habitually resident in the UK must be treated as 'ineligible'. Beyond this the Council has discretion to define other categories of applicant who are not 'qualifying persons'. Some minor amendments to this are proposed.		
(a) Existing Social Housing Tenants: Applicants seeking a transfer who are considered to have no housing need i.e. they would not fall within Bands A-C. <i>This applies to existing social housing tenants who have appropriate accommodation for their household size and needs and would otherwise fall into Band D</i>	No change	We receive a lot of applications from existing social housing tenants who wish to move due to concerns about their neighbourhood or the type of property. Such issues are best dealt with on a landlord/tenant basis rather than via the Housing Register. Other options available include tenants pursuing an exchange or landlords facilitating transfers either within their own stock.
(b) Income and Savings: applicants with sufficient income and/or savings to secure alternative housing. <i>Income threshold for applicants is set at 4 x the Local Housing Allowance rate for the type of property needed which equates to income limits of:</i> 1 bed 31,200 2 bed 39,520 3 bed 47,424 4 bed 64,480 <i>The savings limit is set at £16,000. Discretion may be made in circumstances where social housing is the only realistic option e.g. disabled adaptations needed.</i>	It is suggested that the income limits and the basis on which they are calculated are retained. Savings threshold to be increased to £20,000 for 'general applicants' and £30,000 for applicants aged 55+. Savings will be deemed to include monies received from the sale of a property in the last 3 years by any member of the household	The income thresholds for eligibility can be compared with the income that might be required to purchase different types of property on the local market at lower quartile prices, based on 4 x income multiplier - 1 bed home would need an income of £38,000 - 2 bed home would need an income of £63,112 The increase in the savings threshold provides greater access for applicants who have some savings or have previously been owner occupiers. The increased threshold for older households reflects the difficulty of securing mortgages in later life, the fact that some older people receive lump sums in later life. The demand for many age restricted schemes in Chichester is quite low; it would be beneficial to widen access to this to older people who are currently prevented from applying for these homes.

<p>(c) Unacceptable Behaviour An applicant or a member of their household who has been identified as being involved in unacceptable or anti-social behaviour within the past five years. <i>The policy sets out a wide range of examples of this embracing criminal convictions and conduct of previous tenancies</i></p>	<p>It is proposed that this exclusion is reduced from five to three years.</p>	<p>In practice Registered Providers have their own policies which they use to restrict the grant of tenancies to perpetrators of nuisance or criminal behaviour. There are however circumstances in which the Council may be forced to accept a statutory duty to rehouse a household in these circumstances, in such circumstances reducing the exclusion period to three years allows some flexibility although in practice, such households will still find it very difficult to access social housing.</p>
<p>(d) Minimum age for Applicants The Housing Register is open to anyone who is 16 years of age or older (subject to other restrictions). In practice there are very few, if any, 16 year olds on the Housing Register as main applicants.</p>	<p>It was originally proposed to increase the minimum age for new applications to 18, this recommendation has been modified in the light of representations by WSCC</p>	<p>In practice applicants aged 16 or 17 cannot hold a tenancy, so the scheme does not permit bidding from applicants below the age of 18. There is a case for accepting 16 and 17 year olds where a long term care duty is owed, and this is now reflected in the Scheme.</p>
<p>(e) Applications from mobile and holiday home applicants <i>There is no explicit reference to the eligibility of residents who occupy 'holiday accommodation'.</i></p>	<p>Applications from residents living on holiday parks will be assumed to have accommodation available elsewhere as their 'main residence' and their needs will be assessed on this basis. Only when it can be established that residents have no other accommodation available to them will they be eligible for the Housing Register.</p>	<p>The District includes a large number of 'holiday parks'. Invariably these are restricted in use for residents who have their main home elsewhere. The intention is to clarify the way these applications are managed in circumstances where applicants appear to have no other accommodation. The effect of the change underlines that residents of holiday park accommodation <i>should</i> have alternative accommodation but provides more clarity in circumstances where, for one reason or another, this is no longer the case.</p>

<p>2. Local Connection: The requirement for a local connection to Chichester District is an important element of our Allocation Scheme.</p> <p>Local connection requirements operate in two ways:</p> <ul style="list-style-type: none"> - <i>A Local Connection to the District</i> - is required in order for an applicant to be eligible to join the Housing Register, (albeit this is waived in circumstances where the Council owes a statutory housing duty). - <i>A Local Connection to a Rural Parish</i> – may be used to prioritise an applicants within Bands A-C (i.e. those who have current Housing Needs), for specific allocations in rural areas. This policy is currently applied to Parishes designated as Rural Settlements. 		
<p>(a) Rural Allocation Policy At present this policy applies to all those Parishes which are designated by the Government as Rural Settlements. The parts of the District which do not fall within this designation are (and to which the Rural Allocation Policy does not apply) are Chichester City, East Wittering & Bracklesham, Midhurst, Selsey, Southbourne and Petworth.</p>	<p>It is proposed that strategic housing development areas are also excluded from the Rural Allocation Policy. At present this would include Tangmere, Westhampnett and Shopwhyke Lakes (Oving). <i>A suggestion was made at the Task & Finish Group that the Rural Allocation Policy should also be applied to lettings in the Parish of East Wittering and Bracklesham Parish.</i></p>	<p>The existing Rural Allocation Policy affords priority for local people where opportunities for affordable housing are especially scarce. In doing so it helps to promote more sustainable local communities. There is less justification for these policies in areas with a larger volume of lettings and as part of developments which are planned to meet district wide needs. It is recommended that the Rural Allocation Scheme is subject of a further more detailed review.</p>

<p>3. Priority Banding: Properties are allocated to applicants through a system of bidding based on four Bands A-D, where A is the highest and D is the lowest. Priority within Bands is determined by date order using the date on which an application moved into the relevant band.</p>		
<p>(a) Rough Sleepers, Band B priority for 'applicants who have been registered with an appropriate agency or a charity for a period of 3 months or more as regularly rough sleeping within Chichester District'.</p> <p>(b) Former looked after Children There is no explicit priority given to Care Leavers within the Allocation Scheme.</p>	<p>Revising this would enable to the Council to agree 'quotas' with supported housing providers which would make sure that those with support needs can move on as part of a planned pathway at the right time.</p> <p>The operation of this would require input from providers themselves in order to priorities those best placed to move on to settled homes. External agencies including Stonepillow and WSCC (Children's Services) would be expected to assist identifying those best placed to take advantage of these arrangements.</p>	<p>The intention is to provide a better pathway for those with those with support needs to move on from specialist, supported or temporary accommodation into a settled home. The current Band B option for rough sleepers is in practice difficult to operate and until recently, rarely used.</p>
<p>(c) Adding Children to an application An expected first child will be eligible to be included on the application when the mother is 6 months into her pregnancy. At this point the applicant will be deemed to have a two bedroom rather than one bedroom need.</p>	<p>The proposal is to re-assess applications at the point at which an applicant confirms the pregnancy with their first child (rather than wait until 6 months into the pregnancy).</p>	<p>This change will avoid the potential for applicants to move into accommodation which is quickly too small for their needs and avoids further paperwork at a later date.</p>

4. Management of the Bidding Process		
<p>(a) Time Limits for Bidding: There is a maximum 12 week time limit for bidding for all Band A applicants. There is a maximum 8 week time limit for bidding for various categories of applicant including most homeless households in temporary accommodation.</p>	<p>These time limits should be removed. For Band A and B applicants, the policy should provide for the Council to review priority in the light of applicants' bidding history and current circumstances after a period of 6 months from the original assessment. Separately, the scheme provides the means by which direct offers can be made to homeless households in temporary accommodation who do not bid for permanent housing.</p>	<p>In practice these time limits are not observed and impractical to implement. Notwithstanding this, the policy needs to provide the flexibility to review applications which have A or B bandings where such priority is no longer justified.</p>
<p>(b) Suspension of Applicants from Bidding</p>	<p>A new clause to allow temporary suspension of applicants' ability to bid in circumstances where conduct of a tenancy may render them ineligible to be offered a social housing tenancy e.g. rent arrears.</p>	<p>The introduction of such a clause provides a means of dealing with applicants who are in breach of their tenancy conditions and likely to be refused offers by providers, without removing their applications from the Register entirely. This is more manageable from an administrative point of view and recognises that some applicants may fall into arrears on an intermittent basis.</p>
<p>(c) Direct Lets The policy currently provides scope to allocate properties directly, without advertising in certain circumstances. At present this includes specialist or bespoke properties, Extra Care Housing and circumstances in which RPs are redeveloping existing schemes.</p>	<p>Two categories can be added to this list:</p> <ul style="list-style-type: none"> - Properties which have been previously advertised but not successfully let due to low demand - Circumstances in which the Council needs to discharge a statutory duty under the homelessness legislation and has been unable to do so via the bidding process. 	<ul style="list-style-type: none"> - The first of these exceptions avoids the need to re-advertise properties which have attracted few bids - The second option may be required in order to enable the Council to fulfil its statutory duty to secure accommodation for a homeless household.

<p>5. The Use of Management Discretion: It is important that the Allocation Scheme retains a degree of flexibility to accommodate the wide variety of circumstances in which residents require assistance with housing. At present the scheme allows limited discretion and is inconsistent in the way this should be used.</p>		
<p>The current Allocations Scheme allows for 'Exceptional Circumstances' to be considered but this is only in relation to local connection criteria where approval must also be sought from the Cabinet Member.</p>	<p>The Divisional Manager for Housing may in exceptional circumstances, and on a case by case basis apply discretion to any element of an application.</p>	<p>The use of discretion is an important element of any policy. LA's must not fetter their discretion therefore this additional provision will ensure general discretion in all aspects of the policy. It is suggested that such discretion is best delegated to the Divisional Manager for Housing.</p>

Chichester District Council Housing Allocation Scheme

1) Introduction

The purpose of the Allocation Scheme is to set out the Council's approach to the allocation of social and affordable rented housing within the Chichester District. Although the Council has a strategic responsibility for housing in the District, it no longer owns or manages social or affordable Housing. Instead it works with a range of not for profit housing providers, known as Registered Providers, to meet local housing needs. Most Registered Provider (RP) housing has been developed with assistance from public funding, consequently a significant proportion of lettings of RP homes are made available to households nominated by the Council.

The Allocation Scheme describes the process the Council will follow to manage applications for social housing and to nominate applicants to Registered Providers for specific vacancies which are available. In common with many Councils, Chichester's scheme involves a *Choice Based Lettings* (CBL) system. This is referred to as *Homemove*. CBL allows approved applicants to bid for properties of their choice based on assessed priority and date order.

The Homemove system is used to select applicants to be nominated for vacant homes which are advertised, however the ultimate decision to grant a tenancy to an applicant will rest with the Registered Provider concerned.

2) Key Principles of the Allocation Scheme

All housing authorities are required by law to publish an allocation scheme the details of which should comply with a range of statutory regulation and government guidance. The key sources of this include:

- The Housing Act 1996 Part 6 and 7 which deal with Housing Allocations and Homelessness
- Allocation of Accommodation: Guidance for Local housing Authorities in England (MCHLG,2021)

There are also a range of Regulations in relation to the housing allocations which Governments have made using Statutory Instruments, these are reflected in the Scheme and in some cases referred to in text.

Notwithstanding the statutory requirements referred to above, the Council has significant discretion on the way in which the Allocation scheme is framed. The key principles on which the scheme is based involve:

- Providing a transparent and fair process through which vacant homes can be let to local people
- Making the best use of the housing stock in the District by ensuring that vacant homes are let quickly and efficiently
- Enabling local people to make informed choices about their housing options
- Preventing homelessness and avoid hardship for households who are unable to meet their needs in the private housing market
- Creating sustainable communities by giving additional preference to applicants in housing need in rural parishes
- Treating everyone fairly, taking steps to avoid discrimination on the grounds of ethnicity, religion, sexual orientation, employment or marital status.

These principles reflect the aims and objectives of the Council's Housing Strategy 2020-25¹ as well as the broader vision and objectives within the Council's Corporate Plan²

3) The Housing Register: Eligibility and Qualification

All Council nominations to Registered Provider (RP) homes in Chichester District will be made through the *Housing Register*. Applicants for housing, whether they are new applicants *Homeseekers* or existing RP tenants *Transfers* will need to apply to through the Housing Register. The Housing Register is open to applicants who have a local connection³ to the Chichester District, subject to a range of exclusions which are described below.

There are some individuals who by law cannot join the register regardless of their housing needs or circumstances. A detailed explanation of these categories is provided in Appendix 1, but the main categories include:

1. Those under various immigration rules who cannot claim assistance with housing;
2. Those who do not live permanently in the Common Travel Area (UK, Channel Islands, the Isle of Man or the Republic of Ireland) for tax purposes;
3. Those whom do not have the right to live in the UK; and
4. Groups of people who the Government has decided, or may, in the future, decide are not eligible for housing.

In addition, the law allows the Council not to allocate accommodation to an applicant who it decides is not a 'qualifying person'. The following categories of applicant will not qualify for the Chichester Housing Register:

¹ https://www.chichester.gov.uk/media/33392/Chichester-District-Housing-Strategy-2020-25/pdf/Housing_Strategy_post_council_edit.pdf

² https://www.chichester.gov.uk/media/29770/Corporate-Plan-2018-2021/pdf/Corporate_Plan_2018-21.pdf

³ A detailed description of the way Local Connection is defined is shown in Appendix 3.

- Applicants who do not have a local connection to Chichester District, unless they are owed a duty under Part VII of the Housing Act 1996 or who fall within one of the other exempt groups listed in Appendix 3.
- Applicants who have guilty of unacceptable behaviour serious enough to make them unsuitable as a prospective tenant or to be part of the household;
- Applicants who have assets, or income which are deemed sufficient to make their own housing arrangements
- Applicants who owe significant housing related debt
- Applicants who own a residential property
- Applicants who have tenancies of Registered Provider accommodation which meets their needs in terms of size and suitability.

A detailed description of the way these qualifications apply is provided in Appendix 2

4) The Registration and Assessment Process

Applicants who wish to join the Housing Register must complete an application form or have one completed on their behalf. The form can easily be accessed from the Council's website [here](#). Applicants will be encouraged to make on line applications wherever possible. In circumstances where this is not possible assistance will be offered either by telephone or in person.

Applicants' needs will be assessed using the information provided in the application form. It is the applicant's responsibility to ensure that the form has been completed fully and accurately. Information submitted in respect of an application may be verified by reference to the electoral register and Council Tax records and other sources of information. Following receipt of an application, an applicant will not be able to submit a bid for a property until the application has been verified and set to 'live'.

In order to accurately assess an applicant's current housing circumstances it may be necessary to visit an applicant at home. If a home visit is deemed necessary the applicant must grant the visiting officer access to their property at a reasonable time of the day on reasonable prior notice. Failure on the part of the applicant to facilitate a visit may result in the assessment of an application being delayed or in the case of an existing application being suspended.

Applicants who indicate on the application form that they, or a member of their household, have an illness or disability that is affected by their current home, or who may be vulnerable on physical or mental health grounds, should provide evidence to substantiate this.

Requests for additional priority based on health grounds will be assessed in accordance with the Flowchart shown in Appendix 6. In some cases the Council may require specialist advice to determine the applicant's housing need. Specialist

advice may include referral to a medical adviser, Adults' or Childrens' Social Care, Occupational Therapy services, NHS providers or other agencies as appropriate.

5. Management of Applicants' Personal Information

Personal information will be handled in accordance with the Data Protection Act 2018 and will be subject to the appropriate level of confidentiality. By submitting an application form to join the housing register an applicant consents to the processing of personal data and special category data about themselves. Any non-dependent adults in the applicant's household will also need to provide consent. The Council may disclose information contained in the application and about associated bidding activity and rehousing prospects to service providers and with other relevant Council services as the law permits.

Applicants have the right to see the information held about them and to receive a copy of the information held. This is a subject access request for which the Council may charge a reasonable administration fee.

It is an offence for an applicant to knowingly or recklessly make false statements or to knowingly withhold reasonably requested information relevant to their application. This includes, but is not limited to, information requested on the housing register application form. An offence is also committed if a third party provides false information whether or not on the instigation of the applicant.

Where there is suspicion, or an allegation, that a person has withheld or provided false information, the application status will be changed to 'pending' (if it is a new application) or 'suspended' (if it is an existing application) during the investigation and will be excluded from bidding until an outcome is determined.

If the investigation shows that false information was provided or information was deliberately withheld, the applicant will be withdrawn from the housing register and the Council may consider legal proceedings. The applicant will not then be eligible to apply to join the housing register for the following two years. Anyone made ineligible for the scheme as a result of providing false information or withholding information will be provided with a full written explanation for the decision and will have a right of review of the decision.

The law enables landlords to seek possession of a property where it has been allocated as a result of a false statement by the tenant or a person acting on his or her behalf.

5) Joint Applications

Applications on the Homemove system will be under the name of a single 'main' applicant. Communication regarding applications and bidding will normally be with

the main applicant, using the address or phone numbers provided, unless advised otherwise. Co-habiting partners, spouses or civil partners included as part of an application will normally be listed as joint applicants.

Joint applicants that bid successfully for a property will, in most cases, be offered a joint tenancy by the relevant RP. It will usually not be possible to subsequently grant a tenancy in the sole name of just one of the joint applicants. Applicants who separate should advise the Council as soon as possible so that their applications can be amended on consent of all parties.

When joint applicants want to change to sole applicants but wish to remain registered, the application will continue in the name of the partner with residency and parenting responsibilities for any children of the household. The remaining applicant may make a new application in their own name with a new application date. Joint applicants with no dependents may mutually agree to have an application transferred to the sole name of one of the partners. The remaining applicant may make a new application in their own name with a new application date. If no agreement can be reached the original application will be cancelled and each applicant will need to make a new application with a new application date.

6) Children and Young People

Applications will not normally be accepted until for applicants who have not reached the age of 18. In exceptional circumstances an application may be accepted on behalf of a 16 or 17 year old who is in the care of West Sussex County Council or who is unable to remain with their family. Where applications are accepted on behalf of young people aged 16 or 17 they will not be able to bid for properties until they have reached the age of 18.

Children under the age of 18 will be deemed to be part of a household when:

- they are living with an applicant or co-applicant as a dependent;
- the applicant or co-applicant is in receipt of child benefit for them; and
- the child does not have its main home elsewhere.

Children of applicants who over the age of 18 may be considered to be dependents if they are deemed to be unable to live independently of an applicant or co-applicant and do not have a home elsewhere.

A child can be added to an application if they are substantially dependent on the applicant (including financially dependent), and there is, or will be, a degree of permanence or regularity in that residency. We will normally require an applicant to have full custody of the child, a temporary arrangement will not be sufficient.

Where an Applicant has joint custody/residence of a child, that child will not normally be counted as part of the Applicant's household where the child already has the use of a bedroom with a parent or carer elsewhere.

We will request details of one or all of the care and living arrangements as applicable, to evidence that the child lives, or intends to live, with the applicant including:

- A Court Order
- Confirmation of receipt of Child Benefit for relevant children
- Confirmation of the child's address from the child's GP, nursery or school

7) Reassessing Need and Reviewing Applications

The Council will review all applications on an annual basis, to re-assess applicants' bidding patterns and continuing housing need. If the Council is unable to establish contact with an applicant, applications may be cancelled and removed with notification to the last known contact address.

Further examples, whereby an applicant will be removed from the Housing Register include:

- a) The acceptance by the applicant of tenancy of a property provided by a social housing landlord
- b) The purchase of a property
- c) A change in the applicant's circumstances, rendering them ineligible for the Housing Register.

Applicants who are excluded from the Housing Register will be notified in writing.

8) Change of Circumstances

Applicants whose housing circumstances change must inform the Council so that their application can be re-assessed. Relevant changes of circumstance would include household moves, changes in the composition of a household, or significant changes in applicants' income or financial circumstances. This can be done on line via the Homemove web site or by notifying the Council directly.

Adding Children to an Application: An expected first child will be eligible to be included on the application. When the child is born this must be confirmed by providing a copy of the birth certificate. For second and subsequent pregnancies the expected child or children will not be included on the application until the child is born and a copy of the birth certificate has been provided to the Council.

Adding Adults to an Application: Adults (with the exception of adult children who have never left home) will only be accepted on to an application if there is an

evidenced overriding need to live with the applicant due to circumstances such as ill health or a disability, and they plan to make it their sole home on a permanent basis.

Changes to an applicant's circumstances may result in their priority band being moved up or down.

Increased Banding Priority: Applicants will be given a new priority date. This will be the date the Council were informed in writing of the applicant's change of circumstances

Decreased Banding Priority: Applicants will retain the priority date they were given when they first made an application.

9) Applicants who have Worsened their Housing Circumstances

Where applicants have been assessed to have worsened their own housing circumstances through their own choice, they may be placed into a lower band or suspended from bidding.

10) Assessment of Need

The Council is required to give *reasonable preference* to certain categories of people in need of housing. The Allocation Scheme takes account of these categories and does so by placing applicants in an appropriate priority band, although the priority given to each category is not necessarily equal. The categories of people to who must be given reasonable preference include:

- People who are homeless within the meaning of Part 7 of the Housing Act 1996.
- People who are owed a duty by any housing authority under the following sections of the Housing Act 1996:-
 - s.190(2) (intentionally homeless and in priority need);
 - s.192(3) (non-priority need homeless who are occupying accommodation arranged by the Council);
 - s.193(2) (unintentionally homeless and in priority need);
 - s.195(2) (threatened with homelessness intentionally and in priority need);
- People occupying insanitary or overcrowded houses or otherwise living in unsatisfactory housing conditions
- People who need to move on medical or welfare grounds, including grounds relating to a disability or previous domestic abuse
- People who need to move to a particular locality in the District, where failure to meet that duty would cause hardship to themselves or others.

- Social housing tenants who have a reasonable preference for housing under s. 166(3) *and* need to move to the District to maintain or take up an offer of work in the District.

Once assessed, the applicant is placed in the appropriate bedroom category (as detailed in 11 below) and into one of the four priority bandings in date order of registration. Applicants will be informed of their registration date number and given the following information:

- Priority band and reason for it.
- Priority date.
- The maximum bedroom size they can bid for.
- Mobility group (physical disability level) if applicable.

Additional preference: Certain categories of applicant will be awarded additional preference if they have urgent housing needs:

- Applicants who are currently serving or who have recently left the Armed forces or are dependents of those who have recently served within the Armed Forces. Details of this are provided in Appendix 5.

11) Assessment of Bedroom Needs

For the purposes of determining an applicant's bedroom need or level of overcrowding a separate bedroom will be allocated to each:

- ✓ married or cohabiting couple
- ✓ other person aged 16 or over
- ✓ two children aged under 16 of the same sex
- ✓ two children aged under 10 regardless of sex
- ✓ any other child under 16 (other than a child whose main home is elsewhere).

Additional Bedroom on Health Grounds: The Council may grant an additional bedroom entitlement in exceptional circumstances. This may arise where:

- A member of the household needs to sleep in a room alone for health reasons
- The applicant requires large and essential medical equipment which cannot be stored elsewhere in a property
- An applicant relies on a regular overnight carer in order to remain living independently.

Fostering and Adoption: Applicants who have been approved by West Sussex County Council to enter into an adoption, fostering, or special guardianship arrangement may be granted additional bedroom entitlement.

12) Notification of Decisions and the Right to Review

Applicants will be notified of the outcome of their application, in terms of both eligibility and priority banding and the reasons for this. Applicants who disagree with the way their application has been assessed are entitled to request a review. Applicants should request this in writing whereupon an informal review will be carried out and a response provided. Applicants who remain dissatisfied with this are entitled to seek a further formal review. A request for this must be made within 21 days of the decision. Formal Reviews of decisions made in respect of the Allocation Scheme will be:

- Carried out by an officer senior to the original decision maker.
- Completed within 56 days unless an extension is agreed

13) The Bidding Process

Once a new application has been validated and registered, applicants will be receive notification of their banding priority date and bedroom entitlement and instructions on how to bid for suitable homes.

Within each property advert the eligibility criteria will be set for the property, such as:

- Minimum and maximum number of persons in the household
- Whether the property is suitable for applicants with mobility needs
- If applications are restricted to special groups of people (e.g. age restricted), or applicants with mobility needs
- If pets are allowed
- Whether preference will be given to bidders with a local connection to a specific area or parish
- Any other preferences relating to suitable bidders that have been agreed with the Registered Provider

The advertisement will also specify:

- Whether the home is to be let at a Social Rent or an Affordable Rent
- The form of the tenancy agreement
- The amount of the weekly rent, including any other charges
- Who owns and/or manages the property.

Advertisements will not reveal specific addresses and it will not be possible for applicants view to properties during the bidding process. Dates of 'bidding cycles' indicating the times and dates on which bids can be made will be advertised on the Homemove website. Full details of how to bid are set out in the Scheme User Guide, which is available on the [Homemove](#) website. Applicants can bid for up to three properties for which they are eligible within each cycle.

Assisting Vulnerable Applicants

Although the bidding process is straightforward, some applicants may need assistance in order to complete the registration and bidding process. Assistance may involve:

- Telephone assistance from the Council's Customer Services Team
- Practical assistance from Housing Staff including, where necessary, making bids on behalf of applicants.

14) The Selection Process

The Homemove system places all eligible bids for each property in priority order and this shortlist is provided to the relevant RP who advertised the property at the close of bidding. Subject to any specific local connection requirements, priority is decided by the RP first by band (A to D, with Band A having the highest priority and Band D the lowest) and then by priority date within the band (the applicant with the earliest date on which they joined their current band being given preference) and finally by random selection. Every bid will be assigned a random number when the bid is made. This number is used to resolve a tie; the highest number getting priority.

In certain circumstances the priority with which bids are treated may also reflect mobility criteria and rural local connection criteria. These are explained in more detail in section on *Properties for Which Additional Criteria Apply*.

If there are no eligible bidders for a property the RP, in consultation with the District Council, may decide to make a direct allocation from the housing waiting list or to re-advertise the property in the following cycle.

Applicants will hear directly from the prospective landlord if they have been successfully selected for a property. Successful bidders have a strictly applied forty-eight hour opportunity to respond to offers from Registered Providers. Where no response is received Registered Providers may move on to the next highest priority applicant.

Once bidding closes Registered Providers will contact successful applicants in order for them to view the relevant property. Registered Providers generally make their own checks on applicants' circumstances prior to this proceeding.

Once an offer of a tenancy has been made the applicant will not be eligible to receive any other further offers whilst this offer is under consideration.

A property viewing will be arranged by the RP at which the successful bidder will have an opportunity to view the interior of the property under offer and discuss any other details of the tenancy directly with the landlord. In exceptional cases

Registered Providers may refuse to accept the nomination of an applicant who appears on the shortlist if to do so would conflict with its own Lettings Policy.

15) Properties for which Additional Criteria Apply

Lettings in Rural Parishes: For properties advertised in rural areas of the District a *preference* will be given to applicants within Bands A-C who have established a *rural parish connection* to the parish in which the property is located. The criteria used to establish a rural parish connection is explained in Appendix 3.

The Rural Allocation Policy will be applied to all Parishes in the District **except**:

- Chichester City, East Wittering and Bracklesham, Midhurst, Petworth, Selsey, Southbourne and Tangmere.
- Properties developed within other rural parishes which are deemed to be part of strategic⁴ housing developments e.g. Shopwhyke Lakes.

Local Lettings Plans: In certain circumstances a Local Lettings Plan (LLP) may be applied to a new development at the initial letting stage. This will apply to first lettings only. The purpose of an LLP will be to ensure community balance and long term sustainability of a new community as well as meeting local need. This may involve some variations in the criteria for prioritising applicants to a proportion of the homes within the development. Properties will be advertised in the usual way, but with a statement that preference will be given to applicants meeting the specific requirements of the Lettings Plan. The detail of LLPs will be published and referred to in relevant property advertisements prior to bidding taking place.

Community-Led Housing Schemes: Community-led Housing (CLH) is housing delivered through local social enterprises that encourage local people to play a leading role in providing solutions to the housing need within their neighbourhood. Individual allocation policies for CLH schemes may be agreed between the Council and the CLH organisations concerned at the outset of new schemes. Where schemes are developed with public funding they will be required to reflect the overall objectives of the Allocation Scheme and will be subject to the Council's approval. However the detail of individual schemes may vary and, as a general rule, homes developed and owned by CLH providers may be allocated directly by providers themselves rather than through the Council's Housing Register and the bidding process.

Rural Exception Sites: In certain circumstances, planning rules or other legacy arrangements from the development of a site may require departures from elements of the Allocation Scheme. This is most likely to involve rural exception sites or other

⁴ For the purposes of the Allocation Scheme the term 'Strategic Housing Development' will generally be applied to sites where affordable housing is being provided as part of a larger development of 50 or more new homes.

sites where specific planning restrictions on occupation apply. The South Downs National Park Authority is the relevant planning authority for a large part of the District which includes Midhurst, Petworth and Fernhurst. Developments within these areas may reflect specific conditions required by SDNPA's planning policy. When such properties are advertised for letting via Homemove, any specific criteria affecting the allocation or selection criteria will be clearly indicated.

Almshouses and Non-Registered Providers: In certain circumstances Homemove may advertise accommodation offered by charitable, not for profit or other non-Registered Providers e.g. Almshouses. Such providers are unlikely to have nomination agreements with the Council and may select applicants according to criteria which fall outside the scope of the Allocation Scheme.

Age-Restricted Housing: Some Registered Provider accommodation is specifically designated for older people. Such restrictions will be clearly indicated in advertisements and bids from applicants who do not meet these criteria will not be accepted.

Properties Deemed Suitable for Applicants with Mobility Needs: Certain properties, including ground floor flats and bungalows or properties with existing adaptations may be deemed especially suitable for applicants with mobility needs. Advertisements for such properties will indicate this and preference may be given to applicants who have demonstrated such needs in accordance with Appendix 5 of the scheme.

Other Restrictions: While the HomeMove system aims to provide applicants with housing choice, but there may be occasions when it is necessary for the Council to restrict the areas of the district in which applicants are permitted to bid. For example perpetrators and victims of domestic violence or other violence and/or harassment may have their choice of area restricted in an effort to ensure the health and safety of the applicant, their family or potential neighbours.

16) Direct Lets

In exceptional circumstances the Council may nominate applicants to Registered Providers outside of the advertisement and bidding process. This is known as a *Direct Let*.

Direct Lets may be considered in situations involving:

- **Bespoke or Adapted Property** which has been specifically procured for an applicant with specific needs whose needs cannot otherwise be met
- **Extra Care Housing** schemes including Lapwing Court and Leaholme, in which the need for access to personal care is one of the key criteria for admission.

- **‘Hard to Let’** properties which have been previously advertised but have not been successfully let.
- **Multi Agency Public Protection Assessment (MAPPA) cases** in circumstances whereby the Council is required to rehouse an applicant who is subject to MAPPA proceedings or otherwise may present a risk to public safety.
- **Legal Requirements** - to ensure compliance with legal requirements such as judicial instructions, or to meet the requirements to provide new accommodation for clients subject to Witness Protection arrangements.
- **Discharge of the Housing Duty** under sections 189B, 193 (2) or 195 of the Housing Act 1996 to applicants placed in temporary accommodation
- **Housing Stock Identified for Demolition** – Registered Provider stock identified for future redevelopment or demolition can be allocated outside of the Allocations Scheme as a direct let and offered on an assured shorthold tenancy for a period of twelve months
- **UK Government Refugee Resettlement Programme** - which may involve direct rehousing from families resettled in the UK directly as part of a national government initiative⁵. Such households will not be assessed through the Housing Register and will be nominated directly by agencies responsible for the conduct of the scheme.

17) Registered Provider Refusal of an Applicant

In exceptional circumstances, an RP may refuse the nomination of an applicant who has been shortlisted or withdraw an offer of accommodation if to do so, would conflict with their own Allocations Policy. An offer of accommodation may also be withdrawn if a property is not suitable for the households needs or the property fails to become available. In such cases the RP will inform the applicant of their decision.

18) Applicant Property Refusals

Applicants have a choice as to whether to accept the offer of a tenancy following viewing. Applicants are encouraged to consider carefully the suitability of the property they are being offered, but in some circumstances refusals may result in their application being suspended.

Applicants who have refused three offers within a 12 month period may be suspended from bidding for a period of six months from the date of the last offer. Applicants affected by this will have the right to appeal and some discretion will be afforded in circumstances where a property differs from the published advertisement.

⁵ A small number of households were provided with homes in Chichester by Registered Providers through the Syrian Vulnerable Persons Resettlement Scheme which operated 2017-20. It is likely that this will be replaced by other similar schemes in the future.

Applicants who are owed a homelessness duty by the Council may be advised that this duty will be discharged by the provision of one 'reasonable offer'. This means that applicants placed in temporary accommodation will not be able to remain in occupation of their temporary accommodation following the refusal of a tenancy offer which is deemed reasonable to meet their needs. The criteria for determining a 'reasonable offer' are set out in Appendix 4.

Applicants who are accommodated in temporary accommodation by the Council pursuant to a homelessness duty will be expected to actively bid for suitable properties. In the absence of this, the Council may discharge its duty through a direct offer of suitable housing and terminate provision of temporary accommodation which is being provided.

19) Feedback on Let Properties

When properties are let bidding details will be listed on the Homemove website. This information will remain available in order to enable applicants to get a better understanding of the relative demand for different types of property and to adjust their bidding as appropriate. Feedback published will show the number of bidders for each property, the Band and priority date of the successful applicant.

20) Banding Structure

The Council's banding structure prioritises social housing for those people in greatest housing need. There are four groups, A, B, C and D. Applicants who are placed in Group A hold the greatest priority with priority decreasing from B to D. This is set out below.

Band A

- Homeless households owed the main re-housing duty by Chichester District Council where the only prospect of meeting the households' needs is in permanent accommodation in the social housing sector e.g. the applicant has severe medical need, disability or requires an adapted property.
- Urgent medical priority where the current housing conditions are having a major adverse effect on the medical condition of the applicant (or a member of their household)) so as to warrant 'emergency' priority.
- Tenants of Registered Provider accommodation within Chichester District who are under-occupying by two bedrooms or more and whose relocation will result in the re-letting of a property through the Housing Register e.g. an applicant wishing to move from a three bedroom to a one bedroom home.

- Tenants of Registered Providers within the Chichester District who are in need of a permanent move because their property is imminently required for essential works or redevelopment.
- Tenants of adapted Registered Provider accommodation, whose home can be relet to an applicant in need of adaptations.
- Exceptional & urgent need – exceptional circumstances and/or multiple needs, which warrant emergency priority as agreed by the Divisional Manager for Housing
- Where there is a re-housing obligation because a demolition or prohibition order has been made in respect of the applicant's current accommodation within the Chichester District.

Band B

- Overcrowded households lacking 2 or more separate bedrooms
- Applicants with high medical priority for re-housing where the current housing conditions are having an adverse impact on the medical condition of the applicant (or a member of their household) so as to warrant 'high' priority.
- Applicants living in accommodation which:
 - has been designated as a category 1 housing health and safety hazard *or*
 - has two or more two or more unrelated category 2 housing health and safety hazards that are considered to have similar impact upon the occupant's health and safety as a category 1 housing health and safety hazard *and*
 - where the landlord is unable or unwilling to remedy the defects to the property within a reasonable period of time
- Applicants who have been registered with an appropriate agency or charity for a period of at least 3 months as regularly rough sleeping within Chichester District and who need to move on to settled accommodation as part of an agreed plan between a recognised support provider and the District Council
- Applicants urgently needing to move-on from supported accommodation to settled accommodation within the Chichester District as part of a managed pathway and subject to arrangements between the support provider and the District Council e.g. West Sussex Care Leavers, Domestic Violence Refuges.
- Severe need – exceptional circumstances and/or multiple needs, which warrant high priority as determined by the Divisional Manager for Housing.
- Tenants of Registered Provider accommodation within Chichester District who are under-occupying by one bedrooms and whose relocation will result in the re-letting of a property through the Housing Register e.g. an applicant wishing to move from a two bedroom to a one bedroom home, or from a three bedroom to a two bedroom home.

- Applicants who are occupying interim accommodation pursuant to a duty under the Homelessness legislation where urgent move on is needed to achieve effective and economic use of interim accommodation.

Band C

- Households lacking one separate bedroom
- Medical priority for re-housing where the current housing conditions are having a negative impact on the medical condition of the applicant (or a member of the applicant's household) so as to warrant priority.
- Applicants living in unsatisfactory housing conditions (e.g. the property has at least one significant category 2 housing health and safety hazard) as assessed by the Council's Environmental Housing Team and the landlord is unable to remedy the defects to the property within a reasonable period of time.
- Applicants who are threatened with homelessness and have been given valid notice to leave their present accommodation.
- Applicants who are homeless within the meaning of Part 7 of the Housing Act 1996 and are to be given *reasonable preference* in accordance with section 166A of the Housing Act 1996.
- Applicants with a need to move for welfare or social reasons where failure to meet that need would result in hardship either to themselves or others.
- Applicants who have social housing tenancies, but need to move to the Chichester District in order to maintain or take up employment.

Band D

- Applicants without prioritised housing need factors as set out in Bands A-C.

Generally the banding structure is not cumulative, so for example an applicant who may satisfy two or more Band C criteria such as lacking one bedroom and having a medium medical priority for housing will still awarded Band C. In exceptional circumstances additional priority may be awarded at the discretion of the Divisional Manager.

21) Use of Discretion

The operation of all aspects of the Allocation Scheme will allow for the use of discretion to reflect the circumstances which are deemed to be exceptional. The exercise of discretion will be vested in the Divisional Manager for Housing or other officers who may be designated for this purpose.

Appendix 1 - Eligibility for the Housing Register

Applicants who are not 'eligible'

Whilst most applicants will be 'eligible', the Housing Act 1996 (as amended by the Localism Act 2011) sets out two categories of Applicant who are not 'eligible' and must be excluded from being allocated housing. The two categories are as follows:

- Persons subject to immigration control who are ineligible.
- Other persons from abroad who are ineligible.

The law does not allow the Council to allocate a joint tenancy to two or more people if any one of them is considered to be 'ineligible'.

Persons subject to immigration control who are not 'eligible'

Anyone who is subject to immigration control is ineligible unless they fall into one of the following categories:

- a person who has been granted refugee status and who has leave to enter or remain in the UK; or
- a person who has exceptional leave to enter or remain in the UK granted outside the provisions of the immigration rules - provided that there is no condition that they shall not have recourse to public funds; or
- a person who is habitually resident in the UK, the Channel Islands, the Isle of Man or the Republic of Ireland and whose leave to enter or remain in the UK is not subject to any limitation or condition; or
- a person who has humanitarian protection granted under the Immigration Rules.

Other persons from abroad who are not 'eligible'

Anyone who has come from abroad who is not subject to immigration control will be ineligible if they are not habitually resident in the UK, the Channel Islands, the Isle of Man, or the Republic of Ireland, unless they fall within one of the following categories:

- a person with a right to reside permanently in the UK by virtue of regulation
- a person who is in the UK as a result of his deportation, expulsion or other removal by compulsion of law from another country to the UK.

Appendix 2 – Applicants who are ‘non-qualifying persons’

Applications from the following categories of applicant will not be accepted other than in exceptional circumstances.

1. **Applicants who have no Local Connection to the Chichester District** as defined by the Allocation Scheme; exceptions to this will apply where the Council has accepted a duty under Part VII of the Housing Act 1996 or is a care leaver owed a duty by West Sussex County Council.
2. **Applicants who have local authority or Registered Provider tenancies** which are deemed suitable for the size and needs of their household.
3. **Applicants who own a residential property.** An exception to this may be made if the applicant has medical or health related conditions which require adaptations which cannot reasonably be carried out to their home.
4. **Applicants who owe significant housing related debts** to the Council, a Registered Provider or Private Landlord. Discretion to join the Housing Register may be given if applicants have entered into a repayment plan and have been paying continuously for a period of at least 6 months and continue to pay in accordance with the plan once on the Housing Register.
5. **Applicants who have been identified as responsible for serious anti-social behaviour, breaches of tenancy or criminal activity** within the last three years. This may include:
 - Serious proven breach of tenancy conditions including harassment, nuisance and violence
 - Conviction of using the accommodation or allowing its use for illegal purposes
 - Allowing the property to be seriously damaged by the tenant or other residents or visitors
 - Conviction of an arrestable offence committed in the locality relating to violence or threats of violence
 - Conviction of an arrestable offence relating to violence or threats of violence against employees of the Council or a Registered Provider.
6. **Applicants who are deemed to have sufficient income and/or savings** to secure alternative housing through the private market.
This will be defined as:
 - Income equal to or greater than four times the Local Housing Allowance for the size of home they are entitled to
 - Savings or capital of over £20,000 for applicants below the age of 55
 - Savings or capital of over £30,000 for applicants aged 55 or over.

Exceptions to (6) above may be made where applicants' health or disability mean that a home in the social sector the only realistic option e.g. where substantial adaptations are necessary to meet the needs of one or more household members.

When calculating sufficient capital, the disposal of assets or capital sums may be taken into account. Where applicants have owned a residential property within the last five years proof will be sought to show how the proceeds of any sale or transfer have been disbursed.

Appendix 3) Local Connection

The Housing Register defines Local Connection in two distinct ways:

- *Local Connection* to Chichester District
- *Rural Parish Connection*; this is a local connection to a specific rural parish within the District.

Establishing a Local Connection to the Chichester District

Applicants will be deemed to have a local connection to the Chichester District if they:

- Reside within the Chichester District and have done so without a break for the preceding two years.
- Have resided within the Chichester District for four out of the last six years.
- Are employed within the Chichester District in a role which they have held continuously for at least the last 12 months, and involves at least 16 hours per week. Although the employment need not be paid the applicant should be able to prove that they perform genuine work that is carried out predominantly within the Chichester District boundaries.
- Need to move to the District in order to provide or receive care for a close family member who might otherwise not be able to remain living independently. In such cases one party must have been resident in the District for five years. Other exceptional circumstances that the Council might reasonably consider.

For the purposes of the Allocation Scheme the following categories of applicant will not be required to demonstrate a Local Connection to the Chichester District:

- Applicants who are owed a duty under Part VII of the Housing Act 1996 (unless the subject of a referral to another local authority)
- Young People who have been in the care of West Sussex County Council and have who have not reached the age of 25 at the time of their application
- Social housing tenants who need to move to the District in order to take up a job opportunity which cannot reasonably be accepted from their present home
- Applicants who have been placed in designated supported housing within the District who require move on accommodation and would be at risk if returning to an area in which they previously lived.
- Social housing tenants living outside the District who have secured employment within the District and to move in order to take up or maintain that employment⁶.

⁶ <https://www.gov.uk/government/publications/right-to-move-statutory-guidance-on-social-housing-allocations-for-local-housing-authorities-in-england/right-to-move-and-social-housing-allocations--2>

Establishing a Rural Parish Connection

Applicants will be deemed to have a Rural Parish Connection where they:

- Currently reside in the Parish and have done so without a break for the past two years
- Have resided within the Parish for four out of the past six years
- Are employed within the Parish in role for more than 12 months for 16 hours or more per week
- Have close family (defined as grandparents, parents, siblings or children of the applicant) who currently live in the parish and have done so continually for 5 years or more.

Applicants will not be deemed to have lost a Local Connection or Rural Parish Connection in some circumstances, this will include where applicants have moved to:

- Hospital or other care setting
- Temporary accommodation provided pursuant to being homeless
- Undertake service in the Armed Forces
- Complete educational or training courses
- Supported accommodation as part of arrangements for young people leaving care.

Appendix 4

Guidance on 'Reasonable Offers'

Applicants who refuse three reasonable offers of properties through Homemove may be suspended from bidding for a period of 6 months.

Where applicants are owed a duty under the homelessness legislation or have been provided with temporary accommodation, this duty will be brought to an end if a reasonable offer of housing is refused.

In either scenario the Council will determine whether the offer of the property concerned constitutes a '*reasonable offer*'.

In determining whether the offer of a property is reasonable the Council will have regard to:

- The size and suitability of a property in relation to the needs of the applicant's household
- The affordability of the accommodation
- Any risks to which the applicant may be exposed to by moving to a particular area or neighbourhood
- Whether the advertisement for the property provided an accurate and fair description of the property under consideration

Appendix 5) Armed Services Covenant

The purpose of the Armed Services Covenant is to ensure that members of the Armed Services community are not prejudiced in their access to public services. It relates to those who have served in the Royal Navy, Army and Royal Air Force and their families. The government has set out detailed statutory guidance to ensure that local authority housing allocation schemes recognise the unique circumstances of those who serve in the Armed Services⁷. In operating the Allocations Scheme the Council will have regard to the particular circumstances of those serving or who have recently served in the Armed Forces and will seek to apply discretion where the requirements of Armed Services life may negatively impact on an applicant's opportunity to establish a settled home.

The Scheme identifies an number of specific circumstances in which members applications from members of Armed Services Community will be treated differently to other applicants: .

Local Connection Requirements:

Applicants who are serving in the Armed Forces or who have been discharged within the last five years will be exempt from the requirement to establish a Local Connection to the Chichester District. The Council will exercise discretion to award Rural Parish connections to applicants on the basis of previous residence or family connection but not be restricted by the time periods set out in Appendix 3 of the scheme. This approach will also extend to divorced or separating spouses of service personnel who need to move out of accommodation provided by the Ministry of Defence.

Additional Preference within the Banding Scheme:

The following applicants will be awarded additional preference if they have an urgent housing need (defined as falling within Bands A or B):

- The applicant is serving in the regular forces and is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person's service
- The applicant formerly served in the regular forces within the five years preceding their application
- The applicant has recently ceased, or will cease to be entitled, to reside in accommodation provided by the Ministry of Defence following the death of that person's spouse or civil partner who has served in the regular forces and whose death was attributable (wholly or partly) to that service

⁷ <https://www.gov.uk/government/publications/improving-access-to-social-housing-for-members-of-the-armed-forces>

- The applicant has served in reserve forces and is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person's service.

Additional preference will be given by awarding an earlier priority date than the applicant would otherwise be entitled to. The additional preference will be awarded to reflect the time the applicant spent in the regular or reserve forces in accordance with the following table.

Length of Service	Length of time that priority date will be predated
Less than one year	One week
One to two years	Two weeks
Three to five years	One month
Six to ten years	Six months
Over ten years	One year

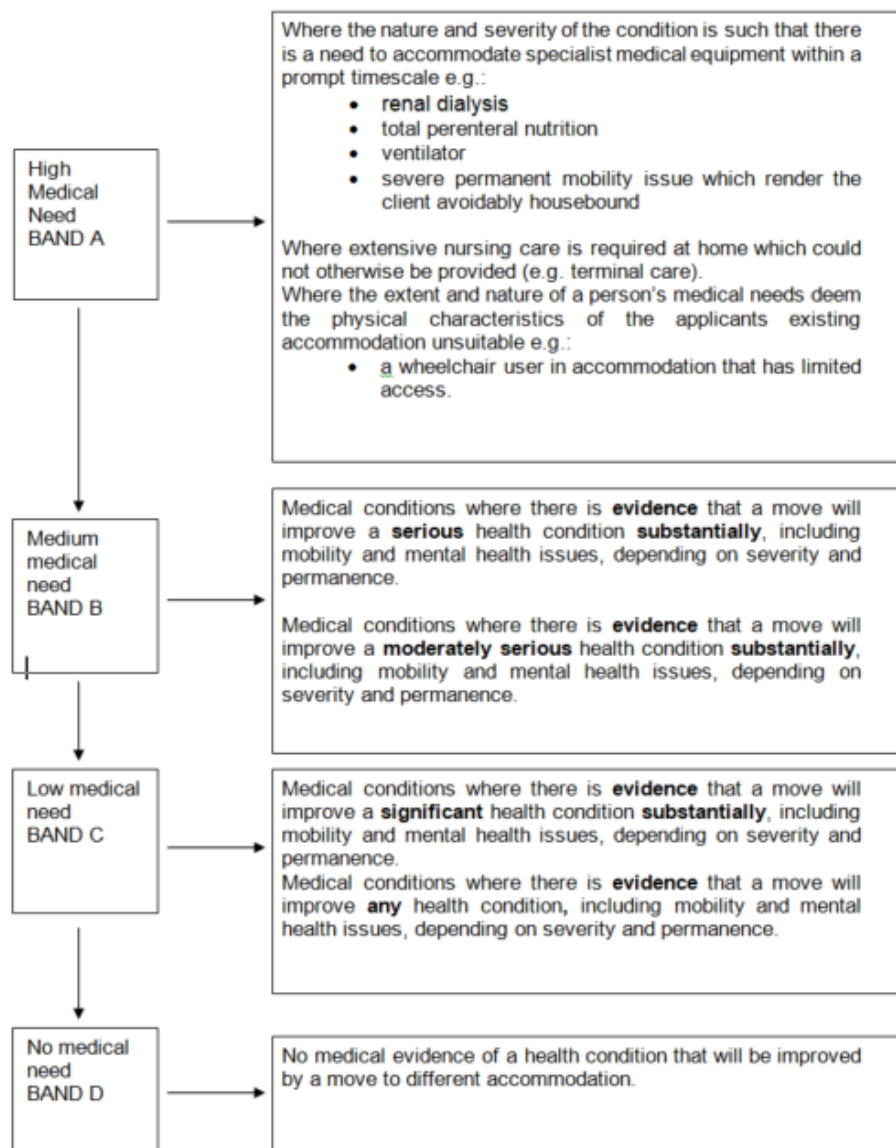
Assessment of Savings and Housing Related Debt

When assessing applications from members of the Armed Services Community the Council will seek to exercise discretion in relation to:

- Lump sum payments to former service personnel who have sustained injuries pursuant to their service
- Debts that have accrued as mesne profit on MoD accommodation.

Appendix 6) Assessment of Priority on Health Grounds

Applicants seeking additional priority on health grounds will be assessed in line with the approach outlined in the flow chart below.



Applicants with Mobility Needs may be assessed in one of three categories according to the table below:

Mobility Level 1	Applicant is wheelchair dependent inside and outside
Mobility Level 2	Applicant is reliant on a wheelchair outside the home
Mobility Level 3	Applicant can manage only 1-2 steps

Properties suitable for applicants with Mobility Levels 1-3, they will be prioritised as such with first preference given to those in Mobility Level 1.

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Chichester District Council

Cabinet

Tuesday 4 May 2021

Westbourne Neighbourhood Plan Decision Statement

1. Contacts

Report Author:

Valerie Dobson
Tel: 01243 534594

Principal Planning Policy Officer
E-mail: vdobson@chichester.gov.uk

Cabinet Member:

Susan Taylor,
Tel: 01243 514034

Cabinet Member for Planning Services
E-mail: sttaylor@chichester.gov.uk

2. Recommendations

2.0 That Cabinet agrees:

2.1. That the Decision Statement as set out in the appendix be published.

2.2. To approve the examiner's recommendation that the Neighbourhood Development Plan proceed to referendum, subject to modifications as set out in the Decision Statement.

3. Background

- 3.1. The examination into the Westbourne Neighbourhood Plan Submission Plan has now been completed and the examiner's report published. The examiner's summary sets out the general findings.
- 3.2. The examiner has carefully considered the contents of the Westbourne Neighbourhood Plan in relation to the requirements of the Basic Conditions. In order to ensure the Neighbourhood Plan meets these requirements the examiner recommends a number of modifications that should be made to the Plan. Subject to the inclusion of these modifications (which relate principally to revisions to the wording and content of policies), he finds that the Plan would meet the basic conditions.
- 3.3. On the basis that the Plan is amended to accommodate the identified modifications, the examiner then goes on to recommend that the draft Plan as modified should be submitted for referendum.
- 3.4. The Decision Statement (attached as an appendix to this report) sets out the examiner's recommended modifications along with the justification for each of them. This Decision Statement has been produced jointly with Westbourne Parish Council.
- 3.5. It is also the examiner's role to consider the referendum area and whether or not it is appropriate if the Plan is to proceed to referendum. In this respect the examiner considers that the referendum area should extend to the Plan area, comprising the

parish boundary in accordance with the designated area as confirmed on 3 December 2013.

- 3.6. In the light of the examiner's recommendation, it is proposed that the Decision Statement is agreed for publication. It is further proposed that the Westbourne Neighbourhood Plan should be modified as set out in the Decision Statement and should then proceed to referendum.

4. Outcomes to be achieved

- 4.1. A referendum on a community based statutory plan that can be used to identify local features of importance and to guide future development in the neighbourhood plan area.

5. Proposal

- 5.1. In the light of the examiner's recommendation, it is proposed that the Decision Statement is agreed for publication. It is further proposed that the Westbourne Neighbourhood Plan should be modified as set out in the Decision Statement and should then proceed to referendum.

6. Alternatives Considered

- 6.1. If the Council does not agree the Decision Statement for publication then the Westbourne Neighbourhood Plan cannot proceed to referendum. Any alternative course of action would then depend upon the reasons why the Decision Statement was not agreed.

7. Resource and Legal Implications

- 7.1. The referendum will incur appropriate costs in line with the Council's duties and procedures. These costs will be met through existing budgets and grant money can be reclaimed from the Government to cover this part of the process.

8. Consultation

- 8.1. Westbourne Parish Council and the local member have been involved in the completion of the Decision Statement and have agreed its contents. The South Downs National Park Authority has been informed and is also in agreement with the Decision Statement.

9. Community Impact and Corporate Risks

- 9.1. There may be a negative community impact if the Westbourne Neighbourhood Plan is not agreed to proceed to referendum. The Parish and community may lose confidence in the neighbourhood planning process.

10. Other Implications

Are there any implications for the following?		
	Yes	No

Crime and Disorder		X
Climate Change and Biodiversity		X
Human Rights and Equality Impact		X
Safeguarding and Early Help		X
General Data Protection Regulations (GDPR)		X
Health and Wellbeing		X
Other		X

11. Appendices

11.1 Westbourne Neighbourhood Plan Decision Statement.

12. Background Papers

12.1. None

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Chichester District Council



Chichester District Council Local Planning Authority

Westbourne Neighbourhood Plan 2017-2029

DECISION STATEMENT

1. Introduction

- 1.1 Under the Town and Country Planning Act 1990 (as amended), the Council has a statutory duty to assist communities in the preparation of Neighbourhood Plans and Orders and to take plans through a process of examination, referendum and adoption. The Localism Act 2011 (Part 6 Chapter 3) sets out the local planning authority's responsibilities under Neighbourhood Planning.
- 1.2 This report confirms that the modifications proposed by the examiner's report have been accepted, the draft Westbourne Neighbourhood Plan has been altered as a result of it and that this plan may now proceed to referendum.

2. Background

- 2.1 The Westbourne Neighbourhood Plan relates to the area that was designated by Chichester District Council as a neighbourhood plan area by Chichester District Council on 3 December 2013 and by the South Downs National Park Authority (SDNPA) on 27 November 2013. This area is coterminous with the Westbourne Parish Council boundary that lies largely within the Chichester District Council local planning authority area. A small part of the neighbourhood plan area lies within the SDNPA area.
- 2.2 Following the submission of the Westbourne Neighbourhood Plan to the Council, the plan was publicised and representations were invited. The publicity period ended on 24 July 2017.
- 2.3 Mr Jeremy Edge was appointed by Chichester District Council, with the consent of Westbourne Parish Council, to undertake the examination of the Westbourne Neighbourhood Plan and to prepare a report of the independent examination.
- 2.4 The examiner's report concludes that, subject to making modifications recommended by the examiner, the Plan meets the basic conditions set out in the legislation and should proceed to a Neighbourhood Plan referendum.

- 2.5 Having considered each of the recommendations made in the examiner's report, and the reasons for them, the Parish Council has decided to make the modifications to the draft plan referred to in Section 3 below, to ensure that the draft plan meets the basic conditions as set out in the legislation.

- 3.1 The Neighbourhood Planning (General) Regulations 2012 require the local planning authority to outline what action to take in response to the recommendations of an examiner made in a report under paragraph 10 of Schedule 4A to the 1990 Act (as applied by Section 38A of the 2004 Act) in relation to a neighbourhood development plan.
- 3.2 Having considered each of the recommendations made by the examiner's report, and the reasons for them, Chichester District Council in consent with Westbourne Parish Council, has decided to accept the modifications to the draft plan. The SDNPA has been informed and agrees. Table 1 below outlines the alterations made to the draft plan under paragraph 12(6) of Schedule 4B to the 1990 Act (as applied by Section 38 A of the Act) in response to each of the examiner's recommendations and the justification for them.

POLICY / PARAGRAPH	MODIFICATION RECOMMENDED	JUSTIFICATION
All text	To accommodate the changes in the policies of the Plan, it will be necessary to make consequential changes to the supporting text.	For completeness.
Paragraph 1.14	Westbourne Parish Council applied for the whole Parish to be designated as a Neighbourhood Plan Area and approval was given by Chichester District Council (CDC) on 3rd December 2013 and South Downs National Park Authority (SDNPA) on 27 November 2013.	To clarify the approval of Neighbourhood Area designation.
Policy OA1 – 3 4.2.5	<p>Policy OA1: Sustainable Development</p> <ol style="list-style-type: none"> 1. Within the Settlement Boundary, as shown in Figure 5, there is a presumption in favour of sustainable development that will apply to proposals that meet all the policies of this plan 2. Outside the Settlement Boundary, development proposals will not normally be considered either appropriate or sustainable unless: 	<p>Unchanged</p> <p>Unchanged</p>

	<ul style="list-style-type: none"> i. they comply with all other policy requirements of the ii. development plan; or iii. it is sustainable development where the benefits iv. demonstrably outweigh the harms, and is of a form or type v. that could not reasonably be located within the Settlement vi. Boundary; or vii. they are rural exception sites to meet local need. <p>3. Development proposals within the Parish will need to demonstrate that they have had regard to all relevant NP policies. take account of all the NP policies to demonstrate that they have considered and accommodated the following, including:</p> <p>(i) — The proposals do not adversely impact the local gaps, views and countryside identified in the WNP (Policy LD4);</p> <p>(ii) — The proposals are to be accompanied by a Landscape and Visual Impact Assessment to show there is no overall adverse harm to the area (policy LD4);</p> <p>(iii) — The proposals are to be accompanied by a study to demonstrate that there would be no negative impact on local biodiversity. This will include potential harms arising from changes to access points and visibility splays to accommodate typical vehicles (Policy BD2);</p> <p>(iv) — The proposals are to be accompanied by technical studies to show that the proposal does not give rise to detrimental increases in levels of activity and traffic, noise and disturbance;</p> <p>(v) — The proposals are to be accompanied by an expert assessment of the potential impact on any designated or undesignated heritage asset and its setting where appropriate (Policy LD3).</p>	Policy modified to provide clarity
Policy OA2 4.4.3	<p>1. Proposals that result in the loss of shops or business premises will not normally be supported unless it can be demonstrated that the shops or businesses are no longer viable, and an alternative shop or business would not be viable on the site through a</p>	Policy deleted to meet the Basic Conditions

	<p>market testing exercise, as prescribed in CLPKP Appendix E, that reflects the site's current value in a business use.</p> <p>2. New employment development proposals including changes of use to retail or business will be supported where they are consistent with all the policies in this plan, throughout the Parish.</p> <p>3. Redevelopment of small scale sites for employment uses in the countryside will be supported where it can be shown to meet an essential need and encourage local employment in line with CLPKP Policies 45 & 46.</p>	
<p>Policy OA3 4.5.1</p> <p>4.5.2</p>	<p>Proposals that result in the loss of community uses within the Parish will not normally be supported, unless it can be demonstrated that the community use is no longer required and an alternative community use cannot utilise the building or site as demonstrated through a market testing exercise as prescribed in CLPKP Appendix E, which reflects the site's current value in a community use. The development of sites inside or outside the settlement boundary for public car parking facilities that serve the use of retail/commercial activities in the village by passing trade, as well as the continuing use of community facilities will be supported providing they comply with all other policy requirements of the plan.</p> <p>For both Policy OA2 and OA3 a market exercise must take place for at least 12 months, as prescribed in CLPKP Appendix E. The site/building must be marketed effectively at an appropriate price that reflects its current use.</p>	To meet the Basic Conditions
All text relating to Policy OA4 Community Balance	Update and edit revised supporting text to reflect amended policy	Supporting text modified to provide clarity
4.6.3	The Parish Council is conscious that the Population Profile (para 2.2 & Figure 3) show that 52% of residents were aged 45 and over	Supporting text modified to provide clarity

	<p>(24% were over 65) at the 2011 census. Over the lifetime of the NP, the Parish will house an increasing proportion of elderly residents, many of whom may wish to downsize to smaller properties within the Parish. Social care is set to become an ever-increasing problem and it requires attracting additional younger residents into the Parish to both help look after the ageing population and to keep the community vibrant.</p> <p>Therefore the Parish Council will look favourably upon appropriate proposals for the provision of housing for young people, by way of smaller housing units and starter homes, affordable housing development including within the rental sector, as well as live/work and self-build initiatives where they meet the policies of the development plan. Regrettably it has not been possible to identify land suitable to accommodate affordable housing during the preparation of this Plan, but such is the Parish Council's concern for the future of the community in this respect, that A high priority will be given to identifying and securing affordable housing in time for the next review of the plan. (see 1.1.8).</p>	
<p>Policy OA4 Community Balance 4.6.25</p> <p>OA4 – 1</p>	<p>Development proposals for any new dwellings must demonstrate that they provide an appropriate choice of homes to contribute towards meeting identified housing needs throughout the Parish and should be accompanied by a 'dwelling mix statement' submitted as part of any planning application to show how the proposal meets specific needs. This statement should provide details of how it meets local needs, including those of young people, local workers, small families, older residents (55+) and people with disabilities. Any proposal that results in the net increase in dwellings or pitches/plots must demonstrate that there will be a mixture of tenures throughout the area and not give rise to any areas of isolated groups of one tenure to ensure social integration.</p> <p>OA4.1 HOUSING FOR YOUNGER PEOPLE</p> <p>Any new proposals for the provision of housing for younger households, by way of</p>	<p>To meet the Basic Conditions</p> <p>To meet the Basic Conditions</p>

<p>OA4 – 2</p>	<p>appropriate starter homes, affordable housing development, live/work and self-build initiatives will be considered in accordance with the NPPF and Policy 34 of the Chichester Local Plan: Key Policies and government guidelines. The Parish Council will give priority to provision of affordable housing in time for the next review of the NP. Proposals for multi-generational living in an existing single household that preserve amenity and comply with all other policies in the plan will be considered where they are secured through legal agreements to prevent separate occupation by unrelated households.</p> <p>OA4-2 1 GTTSP PLOTS/PITCHES</p> <p>Applications for additional Gypsies, Travellers and Travelling Showpeople pitches/plots within the Neighbourhood Plan area will be resisted, as the supply for the identified need for this type of accommodation has already been exceeded for the plan period within the District, which has been disproportionately met by provision within Westbourne Parish. This is to ensure that the current balance between the various sectors of the local community will be retained; any further provision of GTTSP plots or pitches would erode the current mix and balance of tenures and would not be acceptable to the community. Given the lack of identified need, any new consent would be wholly exceptional and in this regard if deemed to meet the exceptional circumstances the proposal would need to pass the strict physical tests applied within the National Park for this type of development.</p> <p>Development proposals to meet the needs of the Gypsy, Traveller and Travelling Showpeople community (as defined in Planning Policy for Traveller Sites (2015) or any subsequent policy) will be permitted where they:</p>	<p>To meet the Basic Conditions</p>
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<p>OA4 - 3</p>	<ul style="list-style-type: none"> a. Can demonstrate a local connection; b. Can demonstrate that there is no alternative available pitch which could be used in the locality; c. Do not result in sites being over-concentrated in any one location or disproportionate in size to nearby communities; d. Are capable of being provided with infrastructure such as power, water supply, foul water drainage and recycling/waste management without harm to the special qualities of the National Park; e. Provide sufficient amenity space for residents; f. Do not cause, and are not subject to, unacceptable harm to the amenities of neighbouring uses and occupiers; g. Have a safe vehicular and pedestrian access from the public highway and adequate provision for parking, turning and safe maneuvering of vehicles within the site; and h. Restrict any permanent built structures in rural locations to essential facilities. <p>Proposals for sites accommodating Travelling Showpeople should allow for a mixed-use yard with areas for the storage and maintenance of equipment.</p> <p>OA4- 2 & 3 HOUSING FOR OLDER PEOPLE</p> <p>Any new pProposals for the provision of housing for older people that meet the wide range of their circumstances and lifestyles will be welcomed and considered in accordance with Government Planning Policy and guidance. The Parish Council will support initiatives to assist older residents to downsize their homes to free up housing stock for younger residents where these are consistent with the other policies of the plan. Proposals for multi-generational living in an existing single household that preserve amenity and comply with all other</p>	<p>To meet the Basic Conditions</p>
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	<p>policies in the plan will be considered where they are secured through legal agreements to prevent separate occupation by unrelated households</p>	
4.6.26	<p>Justification: NPPF para 50 requires LPAs to: <i>'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.'</i></p> <p>1 OA4 – 1 For housing for young households any appropriate, sustainable initiatives will be encouraged.</p> <p>2 1 OA4 – 2 1 For the provision of pitches and plots for the GTTSP community, consultation undertaken on the pre-submission draft of the Neighbourhood Plan identified that residents of Westbourne are extremely concerned about the growing and disproportionate number of Gypsy/Traveller sites in the Parish. The volume and detail of the response has led the Parish Council to include a policy to address this issue. In the absence of a site-specific allocations policy for GTTSP in the adopted Chichester Local Plan and CDC's current decision to delay completion and implementation of a GTTSP DPD, Westbourne Parish Council believes there is a need to establish a local position on supply that is consistent with needs identified in the GTAA April 2013 and consistent with both the NPPF and the PPTS. At the time of the examination of the WNP, it was evident that the supply of plots/pitches for the identified need for this type of accommodation had already been exceeded for the WNP period within the Parish. Further provision of GTTS plots or pitches would be likely to erode the current community balance and would not be acceptable unless all of the criteria in Policy OA 4-2 are met.</p> <p>3 2 OA4 - 3 2 Good housing for older people can enable them to live healthy, independent lives and reduces pressure on working families in caring for older relatives. It can also prevent costs to the NHS and social care; therefore any appropriate and sustainable initiatives will be encouraged.</p>	To meet the Basic Conditions.
Policy LD1: Local distinctiveness	<p>Policy LD1: Local distinctiveness</p> <p>All new development proposals in Westbourne Parish, whether new buildings, extensions or conversions, will be required to follow the policies set out in this Plan and have regard to the guidance set out in the</p>	For clarity and to meet the Basic Conditions

	<p>Westbourne Village Design Statement.</p> <ol style="list-style-type: none"> 1. All new development proposals must demonstrate how they will integrate into the existing surroundings and reflect the established vernacular of the Parish in terms of building styles and materials; 2. The density of any new development should be in character with the immediate local surrounding area, respect the rural nature of the Parish and provide a continuum of the spaciousness, avoiding uniform designs and plots; 3. All new development should have well-defined public and private spaces and enclosure should reflect the local rural character of the area. Appropriate planting with trees and hedges with be encouraged; 4. All new development must demonstrate how sustainable means of travel have been considered and where feasible incorporated to mitigate the impact of parking within Westbourne. it accommodates parking provision within the site so as not to exacerbate the existing situation. 	
Policy LD2: Important Views	<p>Policy LD2: Important Views</p> <p>Any development must maintain or enhance the local character of the landscape and not cause unacceptable loss or diminution of significant views (identified on the Important Views map Fig 8, in para 4.9 and in the VDS) that currently provide open aspects or views from the village centre or other open spaces. Except where views are entirely localised (that is where all the views are contained within the site itself), all development proposals must be accompanied by a Landscape and Visual Impact Assessment and must demonstrate low or negligible impact on landscape views, in particular on those local views identified in the Plan. Where development has a harmful impact on landscape character, identified views or open views, the development will not be permitted unless the proposal can demonstrate that mitigation can be achieved on land within the applicant's control and will reduce the impact to an acceptable level.</p>	To meet the Basic Conditions.

4.8	Important Views	To meet the Basic Conditions.
4.8.1	Intent: The layout of the Parish, notable for its winding roads and lanes presents a series of changing views over fields, greens, recreation areas and triangles. Responses to the NP questionnaire have highlighted the importance of incorporating policies into the Neighbourhood Plan which conserve those features, such as views, which reinforce the rural character of the Parish.	
4.8.2	Justification: The Village Design Statement and Conservation Area Appraisal both identify views and glimpses which have been identified as important to Westbourne residents.	
Policy LD3: Heritage	<p>Policy LD3: Heritage</p> <ol style="list-style-type: none"> 1. The historic environment of the parish and its heritage assets (both designated and non-designated) will be preserved conserved or enhanced. 2. All new development should preserve conserve or enhance the special interest historic character and appearance of the Conservation Area or the significance of other heritage assets. Planning and applications will explain how the design of proposals have sought to retain or enhance positive features of the area identified in the District Council's Conservation Area Appraisal and Management Plan or address issues identified in that document. 3. Development proposals that affect designated and non-designated heritage assets must demonstrate how proposals will preserve conserve or enhance the historic significance of the asset and its setting and must explain how the proposals comply with the VDS proportionate to the assets' importance sufficient to indicate the potential impact of the proposal on their significance. 4. Archaeological investigation of sites where new developments or improvements are proposed planned will be required in areas where there is high archaeological potential. Following a desk-based assessment, appropriate 	To meet the Basic Conditions.

	archaeological investigation must be carried out, where appropriate, prior to construction of new developments. Any reports should be made available for public viewing and be submitted to the County Council for inclusion in the Historic Environment Record.	
Policy LD4: Local Gaps	<p>Policy LD4: Local Gaps</p> <p>In addition to the tests in policy OA1 any development proposed within the local gaps identified in Figure 11 will need to demonstrate compliance with the following criteria, for both inter and intra gaps:</p> <ol style="list-style-type: none"> 1. The development must not diminish the integrity of the local gap by visually and physically reducing the distinct break between settlements; 2. The proposal should be accompanied by a landscape and visual impact assessment to demonstrate no significant diminution in openness and views in the local gap; 3. Proposals should be accompanied by a mitigation plan showing how the local gap can be enhanced by planting and other amelioration or mitigation; 4. Important trees and hedgerows within the local gaps should be retained as part of any development proposal; 5. Positive community uses, consistent with countryside activities, of the open areas in the local gaps will be supported where these can enhance visual impact and biodiversity and enhance the range of facilities available. 	To meet the Basic Conditions and avoid unnecessary duplication.
4.11 4.11.1	<p>LOCAL GAPS POLICY</p> <p>Westbourne is characterised by green spaces and a feeling of rural open spaciousness, especially within the Gaps that surround the village along the main approach roads. These local Gaps are an important feature of the village character and distinctiveness. The patch work of fields, separated by ancient hedgerows, is what creates the character and distinctiveness of our small West Sussex village, making Westbourne the attractive and desired place it is today. These are valued by</p>	

	<p>all who live there and visit and the residents have indicated that they would like the surrounding countryside to have a level of protection similar to that of Green Belt around major cities. The Gaps will protect the environment against inappropriate over-development and the possibility of the reduction or loss of countryside to development. Previously many of them were designated as Strategic Gaps and the community have expressed the desire for them to be retained. They appear deep within the built settlement and have been recognised as special in previous planning appeals.</p>	
4.11.2	<p>Westbourne is sandwiched in a spectacular setting between the Chichester Harbour Area of Outstanding Natural Beauty to the south and the SDNP to the north. It is important that Westbourne should retain its own identity as a rural West Sussex Parish while enhancing the two adjacent, nationally important sites. The Gaps allocated in the plan contribute to the retention of the individual character of the varying parts of the Parish; they will help to prevent the sense of urban sprawl by protecting areas as distinct undeveloped areas between the individual settlements, as well as enhancing the amenity and recreation of all those living in and visiting the area.</p>	
4.11.3	<p>The intention is that the Gaps will assist in retaining the characters of the individual areas, maintain the open vistas and provide open space for walking and observing the varied and abundant wildlife and fauna. The patch-work of fields separated by hedges is characteristic of a small West Sussex village. In order to achieve this aim it is essential to prevent the coalescence of Westbourne village with the Hamlets of Woodmancote/Alds worth, the Borough of Havant and Southbourne Parish. There are many rural walks, bridle and cycle paths within these Gaps which enhance the amenity for the many people using them.</p>	
4.11.4	<p>It is important to note that this Neighbourhood Plan has no influence on the area outside the Parish boundary, making it all the more important that this Plan establishes the Gaps identified within its own boundaries. To demark the Gaps, field boundaries have been used, and some Gaps overlap. The Neighbourhood Plan seeks to identify and establish two types of gap;</p>	

4.11.5	<ol style="list-style-type: none"> 1. 'Inter Gaps', which serve to protect those areas on the boundary surrounding the Parish and; 2. 'Intra Gaps', which serve to protect those gaps that are within the Parish. <p>Inter Gaps: Figure 11 shows the overview of Westbourne with the urban part of Ems worth to the south-west, Hermitage in the Southbourne Parish to the south of Westbourne Village itself and Southbourne, just to the south of Woodmancote.</p> <ol style="list-style-type: none"> 1. It shows the urbanisation of areas approaching Westbourne village itself, from Hermitage and Ems worth in Hampshire. 2. The boundary with Ems worth is not only with Havant Borough but is also the County Boundary. The influence of Westbourne PC and CDC over development here is therefore somewhat restricted. There are currently plans to build 260 houses on the Havant side which will have a significant impact on the gap, thereby encouraging coalescence of the two communities. 3. To the west and north-west the village is either on the County/ Borough boundary or very close to it. Recent housing on the Redland Grange Estate has eroded part of the Gap here, so it is imperative that the remainder, within Westbourne, is protected. 4. To the south the Parish Boundary runs along the A27. Between this and Westbourne Village is one of the best walks in the area running alongside the river Ems, as well as a haven for wildlife. 5. Immediately south of Woodmancote is the Parish Boundary, and on the other side of the A27 is Southbourne. It is important to retain the Gap between these two areas in order to preserve Westbourne's rural parish identity. 6. The approach to Westbourne along Old Farm Lane is bordered by fields giving the sense of rural detachment. Residents, in consultation, asserted their wish for the rural approaches to the Parish to be retained. 	
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4.11.6	<p>Intra Gaps: Figure 11 also shows Cemetery Lane to the east of Westbourne which links Westbourne to Woodmancote.</p> <ol style="list-style-type: none"> 1. Cemetery Lane is straddled by a patch work of fields, the Cemetery at the Westbourne end and established dwellings at the eastern Woodmancote end. 2. The Cemetery is a Non-Designated Heritage asset, and forms an important part of the Gap here. It is important that this separate, open area is maintained to complement its historic character and appearance and to ensure the continuation of this tranquil spot and protect it against inappropriate development. 3. Between the Cemetery and Westbourne village is the Chantry Farm field. A small development here has been identified in the Plan but has been placed in such a way so the Gap can be retained. 4. The Chantry field is one of the main gateways along Foxbury Lane into Westbourne Village, and residents have stated that they wish to retain the rural approach to the entrances to the Parish. 5. Westbourne has recently been subjected to a high level of GTTS applications for the construction and development of Gypsy and Traveller sites in this area. In response to residents' direct requests and comments, the Parish Council seeks to bolster its objections to these developments by reinforcing the countryside designation of this area by maintaining this important local Gap. 	
4.11.7	<p>The allocated gaps to the west of Westbourne Parish, which itself is centred on the River Ems, attracts many animals, birds, insects, various invertebrates and some rare plant life which has grown up on the banks of the clean chalk stream water of the river, and acts as an important green link. Retention of hedgerows is preferred to the use of fences so as to continue to attract abundant wildlife, especially nesting birds. The Gaps will assist in providing corridors for free movement of wildlife like deer. The habitats also provide valuable areas where slow worms, snakes (adders and grass), water</p>	

<p>4.11.8</p> <p>4.11.9</p>	<p>voles, birds and bats live; the list is extensive. In this area of gap there is an important biodiversity and flood capacity function.</p> <p>Intent: Westbourne is characterised by green spaces and a feeling of spaciousness, both in the central core and within green gaps along the main village approach roads and Parish boundary. In preparing this development plan the existing gaps were identified and the intention of this plan is that only the most important ones are identified and allocated to prevent firstly the coalescence of Westbourne, Woodmancote and Aldsworth, (the intra gaps), and secondly the coalescence of other external attached Parishes and urban areas that abut the Westbourne Parish boundary (the inter gaps) to a void in particular coalescence with the Borough of Havant and coalescence with Southbourne Parish. These local gaps are an important feature of the village character and distinctiveness and need to be protected.</p> <p>Justification: To maintain this local distinctive feature and a void coalescence of settlements, the following policy applies to those areas shown as local gaps that form a distinct physical and visual break. These are the 'Inter Gaps', which serve to protect those areas on the boundary surrounding the Parish and the 'Intra Gaps', which serve to protect those gaps that are within the Parish.</p>	
<p>Policy BD2: Natural Environment Policy</p>	<p>Policy BD2: Natural Environment Policy; see figure 12.</p> <p>In order to promote the opportunities for biodiversity in the Westbourne Neighbourhood Plan area, Biodiversity Corridors and existing ecological networks are identified in Figure 12. to recognise the establishment of coherent ecological networks and These offer protection to the significant number of species of flora and fauna to be found there. and To protect and enhance the allow more resilience of these corridors and physical networks against current and future pressures and opportunities for species within. Proposals must be accompanied by a management plan to demonstrate:</p> <ul style="list-style-type: none"> i. how they can will provide net gains to the habitats of the identified corridors; and ii. how the protection, enhancement and management of the biodiversity of the site can will contribute to the resilience 	<p>To meet the Basic Conditions and for clarity.</p>

	of the wider ecological network the resilience of the biodiversity opportunity over time.	
Figure 12	Figure 12 on page 36 Re-name Figure 12 to: "Figure 12 Biodiversity Corridors & Ecological Networks Map."	
Policy LGS1: Cemetery Green Space	Policy LGS1: Cemetery Green Space The site identified in Figure 13 is designated as Local Green Space . The area of the Cemetery and its Heritage setting is very important to Westbourne residents, to the families whose loved ones have been laid to rest there and to visitors to the area and is classified in Chichester District Council's Historic Environment Register as a non-designated heritage asset. Recommend that the cemetery and the related land to the west and south as shown in the submission draft plan should be designated as Local Green Space. For avoidance of doubt, I am content that the LGS boundary should be as identified in the submission version of the WNP.	To meet the Basic Conditions.
Policy SS1: Land to the West of Monk's Hill	Policy SS1: Land to the West of Monk's Hill Land to the west of Monk's Hill is allocated for not less than 6 dwellings for the period 2017-2029. Proposals for the site shall include: <ol style="list-style-type: none"> 1. Development to be laid out broadly in accordance with the sketch diagram above, or an alternative layout that reflects New development shall have regard to the principles contained in the Westbourne Village Design Statement; 2. New The development will comprise only single-storey dwellings with pitched roofs with frontages facing Monk's Hill; 3. A single point of access from Monk's Hill in the middle of the site with slip road serving dwellings. The existing frontage hedgerow and trees will be retained consistent with providing suitable visibility splays; and 4. The area west and north of the dwellings shown on the sketch plan is to be planted and retained as a 	To meet the Basic Conditions and for accuracy

	<p>landscape buffer to create strategic landscape screening from the National Park. The hedgerow/tree line along the field boundary is thought to be used by commuting bats and therefore should be retained and enhanced Prior to the submission of a planning application for new development, bat surveys shall be undertaken by suitably qualified ecologists to determine the presence of Bechstein's Bat and flight routes in this area and if necessary provide a plan for appropriate mitigation measures and habitat management in advance of planning permission being implemented;</p> <p>5. A footpath link within the site will be provided from the development to Monk's Hill at an agreed point along the development frontage to encourage journeys on foot to the village;</p> <p>6. If planning permission is granted, permitted development rights in Classes A, B, C and E of the General Permitted Development Order 2015 (as amended) should be removed to ensure that the dwellings retain the rural character in these peripheral locations;</p> <p>7. An archaeological evaluation should be carried out prior to the submission of any planning application.</p> <p>5. Developments will be expected to avoid or minimise harm to significant archaeological assets. In some cases, remains may be incorporated into and/or interpreted in new development. The physical assets should, where possible, be made available to the public on-site and opportunities taken to actively present the site's archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably qualified individuals or organisations.</p>	
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Policy SS2: Land at Long Copse	<p>Policy SS2: Land at Long Copse</p> <p>Land at Long Copse Lane is allocated for a maximum of 16 dwellings for the period 20167-20209. The proposal will include:</p> <ol style="list-style-type: none"> 1. Development will accord with the layout shown below in Figure 17 or an alternative layout that reflects the principles contained in the Village Design Statement; 2. Details of a landscape scheme will be provided that includes consideration of changing climatic conditions; 3. Details of site levels and, where finished, floor levels of the dwellings will be set in relation to site levels; 4. A footpath will be provided along the southern boundary of the site with Long Copse Lane; 5. A single vehicular access from North Street with a visibility splay of 2.4m x 40m; 6. Foul and surface water drainage strategy including sustainable urban drainage; 7. Affordable housing provision consistent with CDC policy; 8. An archaeological evaluation should be carried out prior to the submission of any planning application; 9. Biodiversity mitigation including bats. 	To meet the Basic Conditions.
Policy SS3: Land adjacent to Chantry Hall, Foxbury Lane	<p>Policy SS3: Land adjacent to Chantry Hall, Foxbury Lane</p> <p>Proposals for the comprehensive development of the site allocated for development on land to the north-east of Chantry Hall shall satisfy the following criteria;</p> <ol style="list-style-type: none"> 1. Residential development shall provide a single point of access from Foxbury Lane and comprise no less than 6 dwellings and constructed on no more than two-storeys under pitched roofs; 	To meet the Basic Conditions and to allow the site to be delivered.

	<ol style="list-style-type: none"> 2. Public open space (POS) shall be provided on the balance of the site, subject to a requirement that POS on land fronting Foxbury Lane and Cemetery Lane shall not be less than 0.175 hectares; 3. Development proposals shall be accompanied by a detailed landscape scheme for the residential component of the site and the balance of the site allocated as POS. The latter shall include appropriate retention of existing mature trees; appropriate hedgerow retention and enhancement along Cemetery Lane; and the creation of a natural, tranquil environment to maintain the character of Westbourne at this village entrance, 4. The landscape proposals relating to the area(s) of POS shall be separately identified and be accompanied by a costed maintenance and management schedule which shall also identify the capitalised cost of maintenance of the POS in perpetuity. 5. The area(s) of POS shall be transferred to the Westbourne Community Trust prior to the implementation of planning permission for the development of Site SS3, together with a planning obligation to complete the landscaping improvements to the POS in advance of first occupation of any new dwelling and to transfer the capitalized maintenance contribution prior to the first occupation of 50% of the gross floorspace of the residential development permitted; 6. Developments will be expected to avoid or minimise harm to significant archaeological assets. If appropriate, remains shall be incorporated into and/or interpreted in the new development. The physical assets should, where possible, be made available to the 	
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	<p>public on-site and opportunities taken to actively present the site's archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision shall be made for the investigation, understanding, recording, dissemination and archiving of that asset, and undertaken by suitably-qualified persons or organisations.</p> <p>Land to the east of Chantry Hall is allocated for 6 dwellings, a car park and open space for the period 2017-2020. Proposals for the site shall include:</p> <ol style="list-style-type: none"> 1. Development to be laid out in accordance with schematic plan, figure 18; 2. The development will comprise no more than two-storey dwellings with pitched roofs; 3. A single point of access from Foxbury Lane; 4. Detailed landscaping scheme to the north-east of new dwellings as indicated on the plan to comprise hedge and trees to protect views from the north-east; 5. The hedgerow along Cemetery Lane must be retained and enhanced; 6. Open space provided as shown on the sketch scheme to include the retention of existing mature trees to create a natural, tranquil environment in keeping with the setting of the Cemetery; 7. A new car park will be provided for village use as set out below and shown on the sketch scheme; 8. A new footpath link to the Cemetery from the proposed village car park will be provided; 9. Area shown on plan to be designated as green space and act as a buffer so the Cemetery and village retain the original 'hygiene gap' that is historically significant for the village; 10. Before permission is granted, a scheme shall be prepared in consultation with the Parish Council (the Scheme), showing how the public open space and car park is to be laid out. The Scheme shall include:- <ul style="list-style-type: none"> (i) Provision for access as shown on the 	
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	<p>sketch scheme;</p> <p>(ii) The car park will be located in the position indicated on figure 18 in order to maintain the separation between the housing and the Cemetery;</p> <p>(iii) The surfacing of the car park will be of 'grasscrete' or equivalent to maintain the rural setting of the location;</p> <p>(iv) Vehicle access to the car park;</p> <p>(v) An area for a paddock as shown on the sketch diagram;</p> <p>(vi) The area of public open space, car park and paddock that will comprise the Scheme shall be not less than the area shown in Figure 18 and described as a green area for recreational space;</p> <p>11. An archaeological evaluation should be carried out prior to the submission of any planning application;</p> <p>12. Any planning permission for residential development shall ensure that provision is made to secure:-</p> <p>(i) The implementation of the Scheme in full by the developer;</p> <p>(ii) The transfer of all the land comprising the Scheme to an appropriate public body (which may be the Parish Council) to secure its provision as public open space in perpetuity;</p> <p>(iii) The payment of an appropriate commuted sum to secure the long-term maintenance of the Scheme;</p> <p>13. Planning permission will be granted with permitted development rights in Classes A, B, C and E of the General Permitted Development Order 2015 (as amended) removed to ensure that dwellings retain the rural character in these peripheral locations.</p>	
4.14.4	<p>Two sites have been selected in the most sustainable locations due to their walking proximity to the school and central village services. Safe pedestrian access and being within a 5-minute walk isochrone were important considerations used in the selection. In addition, all allocated sites are adjacent to the existing settlement boundary or existing built development in the village. The development of the allocated sites is unlikely to will not impact significantly on the Conservation Area, open space areas, prominent views, key gateways, local gaps, biodiversity, significant trees or neighbouring amenity. To the extent that development</p>	To meet the Basic Conditions.

	<p>proposals may cause some planning harm, it is anticipated that due to the likely scale of proposed development that appropriate mitigation is likely to overcome such harm, thereby and thus will conserving the strong village character and local distinctiveness, all proposals being treated on their merits.</p>	
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4. Conclusion

- 4.1 The Authority (Chichester District Council) confirms that the Westbourne Neighbourhood Plan 2017-2029, as revised, meets the basic conditions mentioned in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act and complies with the provisions made by or under Sections 38A and 38B of the Planning and Compulsory Purchase Act 2004. The Westbourne Neighbourhood Plan can now proceed to referendum.
- 4.2 It is recommended that the Westbourne Neighbourhood Plan 2017-2029 should proceed to referendum based on the neighbourhood plan area defined by Chichester District Council on 3 December 2013 and by SDNPA on 27 November 2013.
- 4.3 This decision has been made according to the advice contained in the above report in response to the recommendations of the examiner made in a report under paragraph 10 of Schedule 4B to the 1990 Act (as applied by Section 38A of the 2004 Act) in relation to the Neighbourhood Development Plan.

Notice of the Making of an Urgent Decision

Para 1 of the second sub-section of section 3 in Part 3 of Chichester District Council's *Constitution* provides for any senior officer to make urgent decisions following consultation with the Leader or Deputy Leader of the Council and the Chairman of the Overview and Scrutiny Committee on any matters where it is not practicable to refer these to a meeting of the Council, the Cabinet or other committee provided that a full report on any decisions taken shall subsequently be made. A decision of this nature has been made as set out below:

Decision title	Welcome Back Fund
Decision taker	Tania Murphy
Decision consultees	Eileen Lintill – Leader Adrian Moss - Chairman of the Overview and Scrutiny Committee
Decision date	9 April 2021
Decision details	<p>That in the absence of a Cabinet and Full Council meeting the following be approved:</p> <ol style="list-style-type: none"> 1. That Chichester District Council signs the grant funding agreement with HM Government's European Regional Development Fund, which enables CDC to reclaim up to £173,161 grant in relation to the Welcome Back Fund. 2. The fund is Phase 2 of the Reopening High Streets Safely Fund and is required to be spent on projects and schemes to assist with the safe reopening of high streets at this current time, along with publicity campaigns, marketing activity improving green spaces and seating areas to encourage people back into town centres and potential beautification of areas to support the visitor economy and to help overcome the long-term impacts of Covid-19. Any activities must be linked to a local strategy for reopening in response to the impact of Covid-19. 3. Whilst there is some local discretion in relation to the type of projects which can be funded, the criteria as set out by the ERDF must be met. The action plan will be closely monitored and reported on and parishes and other partners across the district are in the process of being consulted with to determine potential appropriate activities. 4. Expenditure and reclaim of the fund must be undertaken by March 2022 and projects must be additional to what is already in place, cannot replace other funding and must be short term deliverables. <p>These decisions will assist the continuation of expenditure on actions and schemes to assist with the safe reopening of high streets at this time, and will enable reclaim of expenditure. The grant funding</p>

	agreement is in the process of being negotiated with government.
Reason for urgency	Coronavirus pandemic.
Name and date of the meeting to receive a full report	To be noted at the next Cabinet and Council meetings.

Jane Hotchkiss
Director of Growth and Place
9 April 2021

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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