

Chichester District Council

Cabinet

3 December 2019

Local Plan Review - Responses to Preferred Approach Consultation and Way Forward

Contacts

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1. Executive Summary

This report sets out the representations received to the Local Plan Preferred Approach consultation and reports on the consultation arrangements themselves. It advises on other relevant issues and the requirement of the Council to deliver sustainable development. It sets out a range of work to be undertaken in response to inform the Local Plan Review and seeks Member endorsement of the proposed approach.

2. Recommendation

That Cabinet recommends to Council:

1. That:

- a. the Summary of Representations included as Appendix 1 to this report is noted.
 - b. the proposed Council responses to the representations set out in that document are agreed, and
 - c. the Director of Planning and the Environment be authorised, following consultation with the Cabinet Member for Planning Services, to make minor amendments to the Summary of Representations and Responses prior to its publication.
2. That the issues raised in the Summary of Representations document and the other relevant issues summarised in section 9 of this report are noted as key considerations for the ongoing production of the Local Plan.
 3. That the programme of further technical work set out in section 11 of this report is endorsed.
 4. That the implications for the distribution of development set out in section 12 of this report are endorsed, subject to further technical work and testing

through Sustainability Appraisal and Habitats Regulations Assessment being completed.

3. Background

- 3.1 On 20 November 2018, Council approved the publication of the Preferred Approach document along with supporting documents for an 8 week period of public consultation.
- 3.2 The Local Plan Review: Preferred Approach document and supporting material was the subject of public consultation from 13 December 2018 until 7 February 2019. The purpose of the consultation was to seek views on the Council's proposals for strategic development locations for new homes, employment and other uses, and essential infrastructure, a set of area based strategic policies and the detailed strategic delivery policies designed to provide the policy framework for the emerging draft Local Plan Review.
- 3.3. The Local Plan Review: Preferred Approach document included sections on:
- The overall strategy;
 - An overarching vision and strategic objectives for how the Chichester plan area should evolve over the plan period;
 - A set of visions for the three sub areas identified in the strategy
 - The housing requirement for the plan period;
 - Proposed locations for housing, a settlement hierarchy and development strategy
 - Area-based strategic delivery policies.
- 3.4 The consultation documents consisted of five components:
- A key policies consultation document: Draft Local Plan Review 2016-2035 Preferred Approach. This document sets out the overall strategy; area based strategic policies and strategic delivery policies for the Local Plan area. The introduction to the document explained what the consultation was about, how to get involved and what happens next;
 - A schedule of proposed changes to the Policies Map.
 - An initial Sustainability Appraisal. This document included an assessment of the social, environmental and economic impacts of options for policies considered against the sustainability objectives;
 - A Habitats Regulations Assessment to consider the implications of the Plan on sensitive designated ecological assets;
 - A range of supporting evidence studies covering a range of topics, including transport, infrastructure requirements, landscape sensitivity, water quality and capacity, and housing and employment land requirements.
- 3.5 The Local Plan Review: Preferred Approach was prepared taking account of the matters raised in the Issues and Options consultation undertaken in the summer of 2017, the input of officers in other relevant services within the Council and meetings of the Council's Development Plan and Infrastructure Panel.

4. Purpose of this report

- 4.1 The purpose of this report is to advise members of the outcomes of the public consultation on the Chichester Local Plan Review Preferred Approach document under

Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012; to update Members on relevant government announcements on planning; and to seek Member endorsement for the way forward for the Local Plan Review.

5. Consultation

5.1 The following measures were undertaken to publicise the Local Plan Review: Preferred Approach consultation:

a) Advance notification of the Preferred Approach consultation was placed in a special pull out (which set out key issues) included in the Council magazine **Initiatives**, which is delivered to all addresses in the District.

b) Publication of the evidence base and background papers on the **Council's website** with consultation responses invited via the online consultation portal, via email or in writing;

c) **Specific contact** of statutory bodies, including parish councils, neighbouring local authorities, Natural England, Highways England, Historic England and the Environment Agency;

d) **Local press releases** in all newspapers within the District, and a formal notice in the Chichester Observer;

e) Direct contact of all parties currently on the **Planning Policy consultation database** (this includes all statutory consultees, agents, developers and interest groups, as well as residents); and

f) Features on the **Council's social media accounts** (Facebook and Twitter);

g) **Publicity materials including posters, leaflets and postcards** were distributed to Members, Parish Councils and to a variety of locations around the plan area.

h) freestanding banners were displayed in the **reception at East Pallant House** for the duration of the consultation.

i) **Parish Councils were invited to meetings** with officers at East Pallant House.

j) The Planning Policy Divisional Manager attended **Local Community Forums** to talk in detail about the Local Plan Review and answer questions.

k) The Planning Policy Team held **10 public exhibitions** around the plan area, where Officers were able to provide information about the Local Plan review and answer questions from the public. A total of over 800 people attended these events.

l) In addition, paper copies of the main consultation materials were made available at the following **libraries** (Chichester, Selsey, and Southbourne) and the **District Offices and the South Downs National Park Authority Offices** (Midhurst) including access to computers to allow public internet access. A copy of the Local Plan Review: Preferred Approach along with response forms was also sent to all **community centres**.

6. Effectiveness of the consultation

- 6.1 As the Local Plan Review progresses it is important to assess the effectiveness of the process, to evaluate performance and see if improvements can be made to how consultation is undertaken.
- 6.2 In total, just over 3200 representations were made by 729 respondents to the Preferred Approach. This is an increase on the 2221 representations made in response to the Issues and Options consultation held in 2017. However, by comparison the Adopted Local Plan Preferred Approach Consultation (i.e., the previous Local Plan Review at a comparable stage) produced a total of 4968 responses from 868 consultees. Therefore the level of response, though broadly in line with previous experience, is low as a proportion of the Chichester District population (less than 1% of 2018 Mid-Year Estimates).
- 6.3 Achieving high levels of engagement with planning policy matters is often a challenge, and this is not an issue unique to Chichester District. It should also be noted that high levels of response are not an indicator that people are content with a consultation document. Looking at the publicity measures set out in section 5 above, it is considered that no obvious publicity opportunities were missed, though further consideration will be given to this matter.
- 6.4 Nonetheless, the numbers of respondent could be higher and it is important when considering future rounds of consultation that efforts are made to ensure that the process of making representations is as easy as possible.
- 6.5 Further consideration will be given to the use of more accessible materials, such as executive summaries and “key points” documents, to make it easier for the public to engage with the Plan process going forward.

7. Outcomes of the consultation

- 7.1 Part One of the Preferred Approach Plan contained 32 Strategic Policies and 15 Strategic Allocations. Part Two set out 35 detailed Development Management Policies. In addition, a document set out proposed changes to the policies map and a Sustainability Appraisal and Habitats Regulations Assessment were also published. The broad breakdown of consultation responses was as follows –

**Table 1: Consultation responses received to
Local Plan Review Preferred Approach consultation**

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

- 7.2 The consultation portal, available on the Council's website at <https://chichester.jdi-consult.net/localplan/> sets out a web-based version of the Plan which includes all the comments made in response. In addition, summaries of all representations have been prepared and are also available on the council's website at <https://www.chichester.gov.uk/article/30923/Preferred-approach---consultation-December-2018> .
- 7.3 To enable the way forward for the Local Plan Review to be considered, a document summarising the representations received to Part One (strategic policies and allocations) follows at Appendix 1 of this report. The document includes proposed responses made to the Strategic Policies and Strategic Allocations in the Preferred Approach. A similar document concerning the remaining representations (detailed Development Management Policies and other comments) will follow in due course, and full consideration of all representations received will inform any final decisions on the Plan –but this approach enables the main strategic issues to be considered first.
- 7.4 In terms of the number of representations received, the following strategic policies and allocations of the Preferred Approach Plan received the most responses –
- Policy S3: Development Strategy (117 responses), Policy S4: Meeting Housing Needs (127 responses), Policy S5: Parish Housing Requirements (203 responses), Policy S23: Transport and Accessibility (194 responses), Policy AL6: Land South-West of Chichester (194 responses) and Policy AL11: Hunston Parish (145 responses).

8. Issues Raised

- 8.1 Significant issues raised in the representations include the following:
- Concerns over the **high levels of housing development** proposed. Many respondents questioned the need for the scale of housing, or questioned whether it was sustainable or possible to deliver the number of homes set out in the preferred approach document.
 - Concerns over the **Development Strategy**, including the focus on the east-west corridor.
 - Concerns regarding the impact of development upon sensitive landscapes within and adjacent to the Plan area, the **Chichester Harbour AONB** and the **South Downs National Park**.
 - Concerns over **traffic congestion**, and in particular the known issues on the A27.
 - Concerns regarding the **capacity of schools, health facilities and other infrastructure** to meet existing needs and future growth
 - Concerns over the suitability, sustainability and capacity of Strategic Allocations and Parish** requirements to deliver the levels of development needed.
- 8.2 These and other significant issues raised in the representations are outlined in this report. Members should, however, review the full schedule of representations set out in the accompanying summary document and consider the draft Council responses to them. The intention is for the document, subject to any minor amendments to include legibility and give greater clarity on links to ongoing technical work, to be placed on the Council's website.

9. Other Relevant Issues

9.1 Since the publication of the Preferred Approach Plan there have been a number of relevant developments including;

a) Climate Emergency

In July 2019 the Council declared a Climate Emergency. The Council's Environment Panel is now working on developing a detailed action plan to address climate change, and there is a need to ensure that the implications of climate change and the UK's net zero carbon target are embedded in the Local Plan review.

b) Changes to national planning policy and guidance

Earlier this year changes to the National Planning Policy Framework were confirmed, including the approach to assessing local housing need, and subsequent changes to national planning practice guidance have been made, which provide additional detail on aspects such as climate change, appropriate assessment, assessing the deliverability of sites and water quality and supply. This guidance, along with other Government initiatives such as the emerging *National Flood and Coastal Erosion Risk Management Strategy for England* will need to be reflected as appropriate in the ongoing technical work for the Local Plan Review.

c) Uncertainty over the A27 bypass

The discussions regarding strategic improvements to the A27 are ongoing. West Sussex County Council, with input from Chichester District Council, has written to Highways England asking that the A27 Chichester scheme is included in Road Investment Strategy 2 with sufficient scope and flexibility to progress proposals. Whilst these discussions continue it is essential that the Council continues to progress its local plan. The developing evidence base on the costs and deliverability of the works to deliver the A27 mitigation scheme that is necessary to enable traffic arising from the housing and employment growth expected to be identified in the Local Plan Review is relevant to the broader discussion regarding the more long term future of the A27 and the Plan will need to address the present uncertainty on that issue.

10 Considering further spatial options for distribution of development

10.1 Following the Preferred Approach consultation, two additional options for the spatial distribution of development were developed to inform the development of the plan, and in particular the development strategy. A schedule setting out all the development strategies assessed to date is set out in Appendix 3 to this report. The Sustainability Appraisal process has considered and tested each to consider the relative sustainability for each option. The full details are set out in the accompanying document Sustainability Appraisal for the *Chichester Local Plan Review – Alternative Spatial Development Strategies for Testing Through Evidence Base*, which forms Appendix 4 to this report. The additional options are -

Option 1B – Revisions to the preferred approach strategy

- 10.2 The first new option (Option 1B) was developed from the Preferred Approach Option 1A, but sought to maximise numbers at the locations East of Chichester and South West of Chichester. With a small increase in the Parish numbers, this leads to an increase in housing provision from 4,900 to 5,625 (c.700 dpa).
- 10.3 Overall the profile of impacts was similar to the other variations of Option 1 from which it was derived. The increase in housing numbers compared to 1 and 1A increased the positive impacts on meeting housing needs and also on the economic assessment criteria, especially as most of the increase is close to Chichester city. Environmental pressures remain elevated, especially as since the Preferred Approach consultation, the issue of nutrient impacts on Chichester Harbour has become more urgent. Those impacts should be capable of being mitigated, particularly for greenfield sites, but options that add significant numbers across the Bournes (1A, 1B, 2, 4), may pose additional risks for WwTW capacity and nutrient loading in the Harbour.

Option 6 – Northern Focus

- 10.4 The second new option (option 6) takes a very different approach and tests a scenario for delivering primarily in the north east of the plan area. This area has been proposed for only low levels of housing development in all the other options. This had meant that the advantages and disadvantages of significant development in this area had not been tested or drawn out in the SA process before this stage. The greenfield locations in the south of the plan area were retained but reduced to 100 dwellings each. The brownfield sites were kept as per the other options. The 3,250 allocation for the north east was not specifically parcelled out to specific locations, so could imply one very large location (in effect a new village) or several large extensions to existing settlements. As with the other new option at this stage, the overall number of additional dwellings is 5,625.
- 10.5 The new Option 6 has a range of impacts quite distinct from the other options assessed. On the positive side, the large reduction in numbers across the east-west corridor aids habitat connectivity and reduces the loss of best and most versatile agricultural land. If it were to be implemented through one very large development there would be opportunities for low carbon energy infrastructure and on-site habitat gains. The negative impacts are primarily due to a disconnection between the location of new housing and the location of new and existing jobs. This results in poor assessments for reduced need to travel, achieving modal shift and meeting local housing needs as well as on the range of economic objectives. The effects on congestion and air quality are uncertain and would require further work on supporting evidence to allow a fuller assessment in the future.

Conclusion on Sustainability Appraisal

- 10.6 The Sustainability Appraisal process does not determine the Local Plan Review's content but helps to inform decision makers as to the relative sustainability implications of the options and draft policies before them. The findings of these additional scenarios is helping to inform further work as follows.

- 10.7 First, the assessment of the Northern Focus option is highlighting a number of significant negative effects. Whilst further work is needed to confirm the consideration of this option, initial testing to date does not indicate that it is likely to be more sustainable than other options even if it could be demonstrated to be deliverable.
- 10.8 Second, the consideration of the Option 1B (Revisions to the preferred approach strategy) demonstrates at a plan level the benefits of some revisions to the distribution strategy set out in the Preferred Approach Plan. However, some potential allocations have significant issues which require further consideration as outlined in the summary responses report.
- 10.9 This report will now outline further work required, and identifies some known issues regarding strategic sites. Therefore the identification and appraisal of alternatives will continue to be undertaken as the plan progresses.

11. Further technical work

- 11.1 The proposed responses to the summaries of representations report (Appendix 1) highlights a number of workstreams underway to take the Local Plan Review forward. They include, but are not limited to –
- a. A review of the Housing and Economic Development Needs Assessment;
 - b. A Gypsy Sites Delivery Plan to provide further detail on the need identified in the original assessment;
 - c. An update to the Transport Assessment work to review the reference Case Models, consider the implications of the removal of the proposed Stockbridge Link Road, assessment of the cumulative impact of additional spatial options, and revised employment allocation locations, the need for any likely phasing of development, and justification in planning terms for a new road link over the railway line at Southbourne.
 - d. Further transport feasibility work on critical local plan mitigation works on the A27 in response to comments raised by Highways England;
 - e. A focused review of the Water Quality Assessment, focused on the key elements to consider the capacity of wastewater treatment works and the provision of additional capacity that needs to be addressed for the Local Plan;
 - f. Further work to understand the implications of nitrates in Chichester Harbour and elsewhere;
 - g. An update to the Strategic Flood Risk Assessment and stage 2 assessment;
 - h. A Whole Plan Viability Assessment to consider the deliverability of development and test the implications of increased requirements for affordable housing and low carbon future homes standards;
 - i. An update to the Housing and Economic Land Availability Assessment to include confirmation of the availability of suitable previously developed “brownfield” sites and the appropriate density of development;
 - j. Confirmation of the wildlife corridors and landscape gaps ;
 - k. Ongoing Sustainability Appraisal and Habitats Regulations Assessment as the Plan progresses.
 - l. Amendments and Updates to the the Infrastructure Delivery Plan to include water supply .

12. Implications for the Distribution of Development

12.1 Members will be aware that significant further work is required before the final shape of the Local Plan Review can be determined. However, the findings of the consultation and technical work to date is highlighting some areas where the capacity, suitability and deliverability of sites and allocations requires further consideration.

12.2 At present, the implications identified at this point are as follows –

S8 Meeting Employment Land needs

12.3 Comments received in response to the Preferred Approach have highlighted concerns regarding the suitability and deliverability of proposed allocation AL6 (see below), and proposed alternative or additional sites in the vicinity of Goodwood and adjacent to Rolls Royce. The need and potential suitability of these areas for employment use will be considered further through a review of the Housing and Economic Development Needs assessment; a review of the Housing and Economic Land Availability Assessment, and further Sustainability Appraisal work. That work will include consideration of any particular issues arising from a future expansion of the Rolls Royce site.

AL3 Land East of Chichester

12.4 As noted in the Preferred Approach, the site may have capacity for up to 1,000 dwellings. However, further work is needed to confirm whether or not this is deliverable along with a local centre, open space and appropriate green infrastructure. Work is also required to test the transport impacts of that level of development. Therefore compared to the Preferred Approach plan the capacity of this allocation may possibly be increased by 400 dwellings

AL4 Land at Westhampnett/North East Chichester

12.5 This site has been carried forward as a strategic allocation from the adopted Local Plan. There may be potential for part of the site to accommodate additional development (including employment development), and this will continue to be investigated and kept under review, particularly with regards to the need and deliverability of other potential allocations.

AL6 Land South-West of Chichester

12.6 Significant objections received to this policy highlight a number of environmental, availability and delivery issues with this proposal. Further evidence on the deliverability of this proposal will be required before it can be included in the next iteration of the Plan. Further transport work has been commissioned to consider the implications for the A27 mitigation scheme if the proposed Stockbridge Link Road is excluded. Therefore at present the delivery, suitability and acceptability of this site, which was included in the Preferred Approach plan for 85 hectares of employment land and residential development, remains to be determined.

AL8 East Wittering Parish

12.7 It is understood that the parish council does not intend to include housing sites within its neighbourhood plan. Therefore sites will be considered for allocation at East Wittering and Bracklesham in the next iteration of the Local Plan Review following an appraisal of options in the Housing and Economic Land Availability Assessment and Sustainability Appraisal, Habitats Regulations Assessment and other relevant evidence studies.

AL9 Fishbourne Parish

- 12.8 The level of development which could be accommodated within this parish may be impacted significantly by the proposal for a strategic wildlife corridor to the east of Fishbourne. Further work is required to determine the final location and extent of the wildlife corridor, and to assess the impact that may have on capacity. Such reassessment should include the potential for and implications of a significant reduction in the allocation compared to the Preferred Approach Plan, depending upon the confirmation of the location of the wildlife corridor and update of the Housing and Economic Land Availability Assessment to consider the availability of suitable sites and the opportunities and constraints on further significant development within the parish.

AL10 Chidham and Hambrook Parish

- 12.9 Further consideration will need to be given to the capacity of this service village to accommodate significant additional development, particularly with regards to landscape capacity and proximity to the sensitive environment of the AONB. These considerations affect other parishes but the impacts arising from the Preferred Approach allocation of 500 homes for this service village warrant further assessment in light of the overall capacity and suitability of the cumulative allocations in that broader area.

AL11 Hunston Parish

- 12.10 The representations received have highlighted a wide range of issues. Consideration needs to be given to the appropriate level of development in this area, and the balance between proposed levels of development in Hunston and neighbouring parishes.

S5 Parish Housing Requirements

- 12.11 Following the Preferred Approach consultation a number of comments were received regarding the parish housing requirements. Many concerned the appropriate approach to the parishes north of the national park area. In response, the Sustainability Appraisal assessed a “northern focus” option to consider further a significant development (such as a new settlement) in that location, though this has not highlighted significant sustainability gains for reasons set out in that report. It has also considered minor increases to parish numbers in the north of the national park as part of Option 1B.
- 12.12 However, it is the case that a number of additional sites have been promoted to the Council for consideration in the north of the Chichester plan area and it is considered that a refresh of the Housing and Economic Land Availability Assessment will be necessary to inform a decision as to the availability, sustainability and deliverability of development in that location. Given the disadvantages in sustainability terms of this area, including the lack of public transport and that it falls within a different housing market area to where the bulk of the housing needs are generated, this means that the suitability of a substantial amount of development along the lines of the Northern Focus Option 6 considered in the Sustainability Appraisal is considered unlikely to be appropriate.
- 12.13 Nonetheless, the potential for this area to accommodate a more appropriate increase in the level of development compared to that included in the Preferred Approach Plan is under review and the findings of the update to the Housing and

Economic Land Availability Assessment will inform consideration as to whether the balance of development between the plan sub areas is appropriate.

- 12.14 Taking account of the details above, it is clear that further work will be required to be undertaken on all sites and allocations, including the cumulative impact of development with regards to matters such as transport, but the explanation above is intended to highlight the main potential “showstoppers” or impacts on capacity, sustainability or deliverability identified to date.

13 Way Forward

- 13.1 Members are asked to note the issues raised in this report and to endorse the continuing work on the Local Plan Review. In September 2019, the Council adopted a revised Local Development Scheme which indicates the proposed submission plan will be published for public consultation in March 2020. As noted in this report, significant further work is required and not all the relevant factors are within the Council’s control. Nonetheless the intention at present is to use all endeavours to bring forward a Plan which fulfils the undertaking of the Council to submit a Plan by July 2020. The ongoing work is necessarily iterative and as it progresses, officers will be mindful of the potential benefits and disbenefits of revising either the timetable or the scope of the plan (for instance, by focusing on strategic policies and incorporating Development Management policies in the planned subsequent Site Allocations document) and will keep Members informed.

14. Alternatives Considered

- 14.1 Alternative strategies to meet different levels of development need and options for the spatial distribution of development are explored in the Sustainability Appraisal update set out as Appendix 4 to this report.
- 14.2 Preparing a Local Plan is a statutory requirement. If the Local Plan is not submitted for Examination within 5 years of the adoption of the existing one, i.e. by July 2020 then it will increasingly become out of date, particularly with regards to the outcomes of housing supply and housing delivery test.

15. Resource and Legal Implications

- 15.1 The proposal does not have any additional resourcing implications for the Council over and above the budgets already agreed for this work.
- 15.2 The preparation of the Local Plan Review has to follow the requirements of the 2004 Planning and Compulsory Purchase Act 2004 and associated regulations. The Town and Country Planning Act (Local Planning) (England) Regulations 2012 are of particular relevance.

16. Consultation

- 16.1 The outcomes of the Preferred Approach consultation are set out in full on the Council’s website. A report setting out key issues and proposed response to Part One of the draft Plan is included as Appendix 1 to this document.

17. Community Impact and Corporate Risks

- 17.1 The Local Plan Review is likely to have significant implications for many communities in the plan area. Additional sites and locations to accommodate new development have been identified as preferred sites, with new or improved infrastructure and facilities also expected. Consultation will need to be handled sensitively, recognising that there may be local opposition to some proposals, particularly in areas where new development is proposed.
- 17.2 The Council is committed to working with parish councils to bring forward new development. In many cases, parish councils are proposing to plan for future development in their area through the preparation or review of neighbourhood plans. The draft Local Plan Review provides a framework to enable this.
- 17.3 The Local Plan Review has been prepared to facilitate the allocation of land through neighbourhood planning where there has been a stated interest in preparing or revising a neighbourhood plan from the relevant parish council. This does, however, present a risk to the Council in terms of being able to demonstrate that the plan's housing policies are deliverable. In order to mitigate this risk a timetable for the production of neighbourhood plans, related to different stages of the Local Plan Review timetable, is set out below.

| Date | Local Plan Review | Neighbourhood Plans |
|----------------|---|---|
| November 2018 | Preferred Approach (Regulation 18) Plan agreed by Council | |
| Dec-June 2019 | | Evidence gathering/ identification of issues/appointment of consultants |
| Early 2020 | | Strategic Parish Allocations - Reg 14 consultation to be commenced |
| March 2020 | Local Plan Review: Submission Plan (Regulation 19) Plan agreed by Council | |
| September 2020 | Examination hearings start | |
| December 2020 | Inspector's Report received | |
| March 2021 | Adoption | Reg 16 consultation commences |

- 17.4 It is recognised that this timetable will be challenging. The timetable has been prepared on the basis that parish councils may wish to seek changes to the Local Plan Review through the consultation and examination processes, but can work on

neighbourhood plans in parallel with these processes to allow those plans to move forward quickly to examination on adoption of the Local Plan Review.

- 17.5 Should insufficient progress be made in identifying land through the neighbourhood planning process then the Council will need to consider allocating the land in the Local Plan Review: Submission Plan to ensure that the development strategy proposed by the Plan is deliverable.
- 17.6 It is understood that East Wittering parish council does not intend to include housing sites within its neighbourhood plan. Therefore sites will be considered for allocation at East Wittering and Bracklesham in the next iteration of the Local Plan Review following an appraisal of options in the Housing and Economic Land Availability Assessment and Sustainability Appraisal, Habitats Regulations Assessment and other relevant evidence studies.

18. Other Implications

| Are there any implications for the following? | | |
|---|-----|----|
| | Yes | No |
| <p>Crime and Disorder The NPPF requires that local plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area, and that planning policies should ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.</p> | X | |
| <p>Climate Change and Biodiversity The NPPF identifies the mitigation and adaptation to climate change, and improvements to biodiversity, as fundamental issues to address in order to deliver sustainable development. Local plans are expected to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008, and to co-operate to deliver strategic priorities which include climate change. Plans should also seek to minimise the impacts on and provide net gains for biodiversity</p> | X | |
| <p>Human Rights and Equality Impact The Equality Act 2010 sets statutory duties on public bodies such as local authorities with regard to promoting equality and reducing inequalities of outcome. To ensure that the statutory requirements are achieved, it is intended to undertake and publish an equality impact assessment which will be published as one of the supporting documents when the Local Plan Review is submitted to the Secretary of State for formal examination.</p> | X | |
| Safeguarding and Early Help | | X |
| General Data Protection Regulations (GDPR) | | X |
| <p>Health and Wellbeing The NPPF states that planning policies and decisions should aim to achieve healthy, inclusive and safe places</p> | X | |

19. Appendices

Appendix 1 – Preferred Approach Local Plan Part One: Summary responses and proposed response -Table of Responses

Appendix 2 – Preferred Approach Local Plan: PBA response to consultation responses on transport evidence (full document available electronically)

Appendix 3 – Chichester District Local Plan – Development strategies assessed to date

Appendix 4 – Chichester Local Plan Review – Alternative Spatial Development Strategies for Testing Through Evidence Base (document available electronically)

21. Background Papers

The emerging evidence base will be published on the Council’s website. Key background papers of particular importance include:

Chichester Housing and Economic Development Needs Assessment, prepared by GL Hearn

Chichester Local Plan Review Sustainability Appraisal

Chichester Local Plan Review Habitats Regulation Assessment, prepared by Aecom

Chichester Local Plan Review Transport Study, prepared by Peter Brett Associates