

Chichester District Council

All Member Session

29 July 2021

Local Plan and Strategic Infrastructure Update

1. Contacts

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2. Recommendations

- 2.1 That in the absence of significant external strategic infrastructure funding, the full scheme of improvements for the A27 Chichester Bypass prepared by Stantec consultants to support the Local Plan review including the proposed Stockbridge Link Road is undeliverable. Therefore the full package (and the Stockbridge Link Road) will not be progressed further as part of the Local Plan process barring a significant change in the availability and likelihood of securing public sector funding support.
- 2.2 That on the basis of recommendation 2.1 above, the Local Plan Review is likely to be unable to meet full housing needs and the Plan strategy should therefore focus on delivering as much development as possible based upon the capacity of the plan area to accommodate development within an affordable and deliverable package of transport mitigation taking into account all sources of available funding.
- 2.3 That discussions are held with the highway authorities seeking to agree a basis for delivering growth in the Chichester Plan Area until any decision is confirmed regarding a national road scheme for the A27 Chichester Bypass, to inform (along with waste water and other constraints) a revised distribution of development for further testing.
- 2.4 That the Council undertakes to review the Local Plan within 5 years, or earlier if a national scheme of improvements for the A27 Chichester Bypass is agreed by government via the Roads Investment Strategy 3 (RIS).
- 2.5 That the Council's position in respect of the Duty to Cooperate with other local authorities is updated to reflect that the Council is unable to meet the full housing needs of the Chichester plan area.

3. Background

- 3.1 At the special Council Meeting on 12 March 2021 Members considered a report on the revised Local Development Scheme (LDS). That report set out proposals to revise the formal timetable for the production of the Local Plan Review, and noted the significant transport work undertaken to date in considering how the growth expected in the Chichester Plan area can be managed whilst mitigating the impact on the road network, and in particular the A27. The report included an undertaking to report back to Members in the summer with an update on strategic infrastructure and particularly, progress on the delivery of a package of transport and waste water mitigation measures.
- 3.2 To facilitate this update report being considered by Members in July, the Council meeting of 20 July contained a short report. At that meeting, Full Council resolved:
- That Council gives an administrative delegation to the Chief Executive to enact all decisions from the remote session of Councillors on 29 July 2021 and to report that enactment to the next Full Council.*
- 3.3 Therefore the purposes of this report are primarily to set out the findings of the transport work being undertaken to date on the Local Plan Review; an update on other infrastructure issues and the implications for the emerging Local Plan.

Transport Work and update

- 3.4 Transport and the A27 have always been recognised as key considerations for the emerging Local Plan.
- 3.5 In the absence of any national scheme to deal with the known issues on the A27 at Chichester, the Local Plan Review must demonstrate that in the meantime, development proposed in the Plan will not have unacceptable transport impacts. The *Preferred Approach Plan*, published in December 2018, was accompanied by the document *Transport Study of Strategic Development Options and Sustainable Transport Measures* (the "*Preferred Approach Transport Study*") prepared by consultants PBA (now Stantec). That document is available on the council's *Local Plan Supporting Evidence* webpage and sets out a package of measures to deal with the transport impacts of the level of growth envisaged in the *Preferred Approach Plan*.
- 3.6 It is worth noting that the Local Plan which was adopted in 2015 was accompanied by a package of measures (albeit smaller in scale) with a similar aim. A comparison of the previous proposed junction amendments in 2015, with the package proposed in support of the *Preferred Approach Plan*, is set out on page 136 of the *Preferred Approach Transport Study*. In addition, the *Preferred Approach Transport Study* included a new Stockbridge Link Road between Fishbourne Roundabout and the A286 Birdham Road. The full rationale and details of this approach are set out in the *Preferred Approach Transport Study*, but an important aspect of the strategy was to rule out right turns at Stockbridge and Whyke roundabouts, - hence the Stockbridge Link Road allowed traffic to and from a revised Fishbourne Roundabout to make those turns.

- 3.7 The *Preferred Approach Transport Study* was accompanied by transport modelling evidence which tested and assessed the traffic movement arising from both the development envisaged in the *Preferred Approach Plan*, as well as the change in movement patterns arising from changes in the road network – i.e. the changes in the junctions, the new Stockbridge Link Road, etc.
- 3.8 The outcomes of the *Preferred Approach Plan* consultation were considered by Cabinet and Council in December 2019. In its response West Sussex County Council confirmed it had worked with the District Council in the production of the *Preferred Approach Transport Study*, and did not object to the findings, but highlighted a range of delivery risks associated with the works including the Stockbridge Link Road and sought further work to address those concerns.
- 3.9 In their response, Highways England confirmed that in their view the proposed package of measures in the *Preferred Approach Transport Study* would mitigate the adverse impacts of the envisaged growth on the Strategic Road Network, but they also sought more work to confirm deliverability and funding. In addition, Highways England advised the Local Plan Review should only consider the improvements contained within the *Preferred Approach Transport Study* as these have a reasonable prospect of coming forward (subject to funding) – i.e. not any potential national road scheme. The responses are available in full on the Council’s website at <https://chichester.oc2.uk/document/6> (click the “search representations” button to bring up the list of organisations).
- 3.10 In addition to the above issues, a range of other concerns were raised regarding the Stockbridge Link Road, including environmental and visual impacts and the resulting rerouting of traffic through local roads.
- 3.11 The above factors led to an update of the transport work to consider the implications of the removal of the proposed Stockbridge Link Road from the proposed transport mitigation package. This was confirmed in a report to Cabinet and Council in December 2019.

4. Investigating an alternative to the Stockbridge Link Road

- 4.1 Following consideration of the outcomes of the *Preferred Approach* consultation, Stantec were commissioned to undertake a two-part assessment of the transport implications of removing the Stockbridge link road. They were commissioned to first, set out the highway implications for removing the link road, and then second, if (as expected) it was determined on traffic grounds to be required, identify alternative mitigation to address resulting capacity and safety impacts on the highway network.
- 4.2 As expected, testing the road network without the Stockbridge Link Road confirmed the Local Plan mitigation is not adequate to mitigate the impact of the additional traffic. Following that, an alternative approach was considered. This was identified with reference to a number of factors, including the constraints at each A27 junction, the need to facilitate access to and from the Manhood Peninsula, and the need for a scheme which could feasibly be funded and delivered. This led to a potential “hamburger junction” being identified as an alternative approach at Stockbridge Roundabout. Other potential measures, such as grade separation or

amendments to the scheme at Whyke Roundabout were not taken forward given likely issues with deliverability.

- 4.3 Testing the alternative approach was in two parts. First, an initial feasibility junction design was drawn up of the proposed new junction. It was shared with West Sussex County Council (as Local Highway Authority) and Highways England in the first instance to test the initial feasibility of the junction design in its broadest terms. Following initial technical feedback the revised junction was then tested through modelling to determine if it would be capable of satisfactorily dealing with the modelled traffic flows arising from the *Preferred Approach Transport Study*.
- 4.4 The initial findings of that work were the subject of a presentation given to CDC Members at the meeting of the Development Plan and Infrastructure Panel in September 2020. The presentation concluded that the alternative Stockbridge Roundabout scheme could not accommodate the level of anticipated traffic by the end of the Plan period, and it was expected that the highway authorities would raise concern.
- 4.5 Because the work had identified a serious issue with the alternative to a link road, the envisaged later stages of the investigation (to test safety etc) were not proceeded with. The findings were written up into a report and shared with the highways authorities for their views. Both Highways England and West Sussex County Council responded, and were content with the findings of the report, the final version of which was published on the Council's website at the end of March 2021.

5. Further Transport Evidence

- 5.1 Following the above, further technical work was identified to investigate and progress transport matters, namely –
 - a) Further transport modelling, to investigate the transport impacts development, and determine when the proposed transport improvements at each junction will be required;
 - b) Further feasibility work on each of the suggested major road schemes, to provide comfort that they are deliverable and provide greater comfort that the cost estimates are accurate; and
 - c) Specific feasibility and impacts study on the Stockbridge Link Road itself, to consider the wider environmental and visual impacts of the proposed Link Road.
- 5.2 Whilst this work was underway, meetings were set up with key parties to discuss the outputs and the potential implications for the Plan.

Infrastructure Constraints and the Emerging Plan

- 5.3 The potential for infrastructure constraints to impact upon the delivery of development has been acknowledged for some time. In response, advice was sought from the Government's Planning Advisory Service (PAS) on the potential for infrastructure constraints to justify and require a phased approach to development or restrict the level of development over the local plan period.

- 5.4 The response from PAS is set out in full in Appendix 1. It does not provide an “off the shelf” answer to follow, but does provide some useful context and examples to consider, and a helpful reiteration of the need for greater certainty that development can be delivered for the first five years of the Plan period, with less certainty required in planning terms for the latter stages of the Plan.
- 5.5 In addition, the PAS report has highlighted the level of planning judgement required to substantiate a justified approach in these matters. Therefore an advisory meeting was set up with the Planning Inspectorate consider the outcomes of the discussions on transport infrastructure an funding outlined above.

Transport Work

- 6.1 Following consideration of responses to the *Preferred Approach* Local Plan consultation and receipt of updated evidence on the availability of land, development requirements, and emerging evidence on strategic infrastructure opportunities and constraints, a potential revised distribution of development was prepared towards the end of 2020 to test further through evidence. The revised distribution of development fully met the needs of the Chichester plan area, and included a sufficient buffer to ensure the needs of the area were met and to address unmet need arising from that part of the district which falls within the South Downs National Park.
- 6.2. The Council’s transport consultants Stantec were commissioned to prepare revised transport modelling based on this revised distribution of development to address two main questions –
- a. What the necessary interventions were to mitigate the transport impacts of this planned level of growth; and
 - b. The timing of these improvements, with reference to anticipated delivery of the proposed revised distribution of development.
- 6.3 Initial outputs of that modelling work were received and a working draft advisory note forms Appendix 2 of this report. The findings were broadly as follows –
- a. The mitigation package identified as part of the *Preferred Approach* Plan was broadly sufficient to mitigate the impacts of the proposed revised distribution of development (though some additional smaller measures may be required to mitigate local junctions or updated based on the output of the accident analysis); and
 - b. With regards to timing, investigations were undertaken into the relative merits of implementing measures at the junctions in a west-east and an east-west order (with the east-west order mitigated by necessary amendments to enable all journeys to be made throughout the delivery process). A third option was recommended which ranked the order of need based on limited funds and delivered investment as and when funds were secured.

Meeting with infrastructure funders

- 6.4 On the back of this advisory note, a meeting was held on 30 June with key parties. Present were representatives of the following key organisations:
- Chichester District Council (CDC)
 - CDC's transport consultants, Stantec
 - West Sussex County Council as Highway Authority
 - Highways England
 - Homes England.
- 6.5 At that meeting an update to progress on the local plan was given and the findings of the emerging transport work were discussed. In addition, the potential funding towards the identified transport works which could be secured through development contributions was outlined.
- 6.6 At that meeting, the following key points were established –
- The total transport mitigation package identified in support of the *Preferred Approach* Plan was estimated to cost approx. £65m in 2018. The highway authorities have raised concerns that this was an underestimate.
 - Notwithstanding any cost increases, this package could not be funded through developer contributions alone. Initial estimates of the amount which may be secured towards this were in the region of £33-£45m (based on an uplift of contributions and a full level of development in the proposed revised development distribution).
 - Homes England advised there was no appropriate external funding pot available at present. Announcements were expected in the Autumn statement this year, but there was no certainty regarding the scope, scale and timing of availability of any appropriate funding source for the transport mitigation.
 - Highways England advised there is no certainty that a national scheme (the A27 Chichester is identified as a “pipeline project” in RIS2) will be forthcoming, or that it could be assumed that it will provide capacity *of itself* to support future development.
When Highways England were questioned about whether they would object to the Local Plan Review being brought forward without all the necessary investment in the A27 to mitigate growth being secured, they advised that they would need to consider the evidence available at that time.
- 6.7 A subsequent meeting was held with the Coast 2 Capital Local Enterprise Partnership who confirmed they were not in a position to contribute funding to the identified funding gap.

Conclusions on Transport matters

- 6.8 Following the discussions above, it is clear that, from projected sources of funding it is not currently possible to fully secure the funding necessary to be able to deliver the full level of development envisaged in the *Preferred Approach Plan*.
- 6.9 Members will be aware that the work undertaken to date indicates the Stockbridge Link Road is the single most expensive element of the mitigation package and has a number of delivery issues. It was intended these issues would be investigated further through a feasibility and impacts study. However, given the quantified funding issues, and outcomes of discussions with key parties outlined above, it is considered there is sufficient justification and evidence now to conclude that the Stockbridge Link Road is currently not fundable or deliverable through the local plan process and therefore should not be proceeded with unless or until there is a significant change in circumstances. Therefore the detailed feasibility and impacts work envisaged for the Stockbridge Link Road will not be undertaken, although transport feasibility work for other junction works will still need to be done.
- 6.10 The onus is on the Council to produce a Local Plan to deliver identified development needs. Hence there has been a focus to date on progressing work and actions within the Council's control (such as transport studies) with the aim of securing a Plan which can be found sound at Examination. This has been reinforced by uncertainties regarding the status and outcome of any national road scheme for the A27 Chichester Bypass.
- 6.11 However, the limitations of what the Plan can secure and deliver as outlined above are now clear. It is essential that any development strategy is prepared with the agreement of the highway authorities, to manage how development will proceed, either through the Local Plan or via planning applications.
- 6.12 In light of the recently established funding constraints for transport mitigation, further work in this regard is underway. An alternative, "infrastructure constrained" approach to development is being discussed with transport consultants Stantec and will be used to inform further discussions with the highway authorities to seek an agreed basis for determining how much development can be accommodated, where it can be accommodated and whether it can proceed now or needs to be phased.
- 6.13 Although an agreement has not yet been reached with the highway authorities, it is reasonable to conclude that this issue has significant implications for the level of development which could be accommodated, specifically in the southern part of the Plan area (though with implications for the total level of development which could be achieved). Actions in response to this are set out in section 10.1 below.

7. Waste Water infrastructure

- 7.1 In addition to the ongoing transport work, Members will be aware of the ongoing and extensive discussions between CDC officers and Southern Water regarding the capacity of wastewater treatment infrastructure, and the implications for the emerging Local Plan Review.

7.2 Southern Water is the authority with responsibility for wastewater. On-going discussions with Southern Water and the Environment Agency have concluded that whilst ultimately an engineering solution can be found to accommodate future growth, environmental limitations are a constraint, particularly in the western part of the plan area. The parties have not yet reached an agreed position, although work on a Statement of Common Ground is being progressed. So far, Southern Water has not stated that, notwithstanding the acknowledged environmental capacity issues which affect some of their waste water treatment works, that new development could not be served in some other way, for instance by delivering a new long sea outfall or amendments to their network to reroute waste water to a more appropriate works. Nonetheless, considerable concern remains that the Plan is necessarily being brought forward but without certainty on this important issue. Infrastructure options to serve the Chichester plan area are being examined by Southern Water over the next year but these will not be confirmed until the adoption of the DWMP in 2023 .

8. Update on other Infrastructure matters

8.1 The most recent responses from statutory and other key consultees relate to the potential revised distribution of development prepared towards the end of 2020 to test further through evidence. These responses are set out in Appendix 4 of this report. It is worth noting that these responses were made in response to a distribution which would meet the needs of the Chichester plan area in full.

8.2 Key comments include –

- a) The EA confirm that new development should ideally look for connection to Tangmere WwTW. The EA support the recognition that future development may need to be phased so that it aligns with infrastructure provision.
- b) Natural England advise that the Local Plan should plan for the forecasted increased capacity demands on Waste water treatment works. In addition, due to concerns about water abstraction at Hardham, and the potential adverse effect on the integrity of the Arun Valley Special Area of Conservation (SAC) and Special Protection Area (SPA), mitigation measures (water neutrality) within the Sussex north supply area will need to be provided
- c) WSCC identify insufficient primary capacity to accommodate the sites to the east of Chichester where land for a 2FE primary school would be required. Any development within Hunston and North Mundham parishes cannot currently be accommodated in the existing primary schools in the area. Further capacity would be required to accommodate the development. Bosham, Chidham and Hambrook, Southbourne and Westbourne are all within the same school planning area; the cumulative total of the strategic allocations brings forward a requirement for circa 3 forms of entry additional (primary) school places and potential contributions for secondary places

8.3 These issues will be considered alongside the broader strategic infrastructure matters outlined in this report.

9. Planning Inspectorate (PINS) Advisory Visit

9.1 Following the discussions with infrastructure funders, and subsequent conclusions on transport matters, a meeting was held with a Planning Inspector to obtain advice on the findings and implications for the Local Plan Review. Following the meeting the Inspector provided an advisory note which forms Appendix 3 of this report. The Inspector has highlighted that before concluding that housing needs cannot be met, the Council will need to determine –

- a. what level of housing could be achieved based on the required improvements to the A27 without undermining viability, and thus deliverability;
- b. whether the full housing needs could be met in another way, which includes taking a step back and reassessing the spatial strategy and distribution of development in other parts of the local plan area; and
- c. if not, then whether housing needs could be met elsewhere through constructive, active and on-going engagement as part of the Duty to Cooperate.

9.2 It should be stressed that while the Inspector did not rule out the Council proceeding with a lower level of development in the emerging local plan, he did emphasise the “high bar” in terms of justifying such an approach and the need to fulfil the Duty to Cooperate.

10. Next Steps

10.1 The technical work, and most recent discussions outlined in this report have considerable implications for the emerging Local Plan. The main work areas are considered to be as follows –

- a) Agreeing a basis with Highways England and West Sussex County Council for delivering growth in the Chichester plan area as outlined in paragraph 6.12 while the future of any national road scheme is uncertain
- b) Using that to agree the basis for the emerging plan going forward, including the amount of development which is deliverable;
- c) Concluding work with Southern Water and the Environment Agency to arrive at an agreed approach to delivery of development, particularly in the western part of the Plan area;
- d) Using that to agree any additional phasing or other limitation on delivery of development;
- e) Following the Inspector’s advice, further considering the potential to deliver more development in parts of the plan area less constrained by these issues, including the northern part of the Plan area, to demonstrate all possible options have been exhausted.
- f) The steps outlined here need to be discussed with neighbouring authorities under the Duty to Cooperate to highlight this issue for the Chichester Plan area

and explore options to potentially accommodate unmet need outside of the plan area.

- 10.2 Members agreed a timetable for production of the Local Plan in March 2021. At the time of writing this report, critical further discussions with the highway authorities have been identified which will need to take place to seek agreement for how growth will be managed, both for the emerging Local Plan, Neighbourhood Plans and for planning applications. Therefore, for now it is not envisaged that there is a need for a formal review of the Local Plan timetable, although the council's webpage should be updated with the above information. Members will be kept informed as to progress. It is envisaged that a further report will be brought back to Members after the summer to provide a further update.
- 10.3 With regards to Neighbourhood Plans, it is recognised that the issues raised in this report provide further uncertainty. Parish Councils bringing forward neighbourhood plans have been asked to progress to Regulation 14 plan consultation prior to the publication of the Local Plan. It is considered appropriate that they still do so, as it assists all parties in understanding the potential and constraints in each parish (including the issues raised in this report) while the Local Plan is being brought forward.
- 10.4 It is therefore proposed that the recommendations in this report, and the next steps identified here, are (if agreed) communicated to parish councils by letter and an update is added to the next local plan newsletter which goes out to interested parties.

11. Alternatives Considered

- 11.1 Essentially the Local Plan has two options, given the issue with infrastructure funding – either to go forward with proposals to meet the full level of identified development need but without certainty over funding for transport infrastructure, or to propose a reduced level of development for the plan area given the current significant shortfall in funding for this infrastructure. This has been previously identified as a key issue for the Local Plan Review and led to the advice note from PAS. However, the additional discussions with Homes England and Highways England have helped to clarify some aspects. In particular, the lack of public sector funding to support the A27 mitigation package was highlighted in Highways England's [response](#) to the Preferred Approach consultation (points 2 and 4) and no source of funding has been identified since then.
- 11.2 Given the above, it is considered that taking forward the Plan along the lines of the *Preferred Approach Plan*, i.e. meeting full development needs but without identified sources of funding to deliver the necessary works to the A27, is unlikely to be found to be a sound approach at examination. The recent Inspector's reports to [Tandridge](#) and the [North Essex Authorities](#) provide evidence that Inspectors are seeking a level of certainty regarding deliverability of necessary infrastructure that it will not be possible to secure over the next 18 months or so. An objection in principle from either of the Highway Authorities is considered extremely likely.

12. Resource and Legal Implications

- 12.1 The proposals in this report do not have any immediate resourcing implications for the Council over and above the matters contained in the Local Plan review budget update report that was agreed at the Council meeting of 20 July.
- 12.2 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.

13. Consultation

- 13.1 There is no requirement for consultation on the contents of this report, although proposals for communications are set out in paragraph 10.4.

14. Community Impact and Corporate Risks

- 14.1 Bringing forward a plan which does not meet all identified development needs carries significant risks. These risks will need to be addressed as far as is reasonable by the steps outlined in paragraph 10.1. Members are also referred to some of the examples set out in the PAS advice note (Appendix 3) which does highlight a number of instances where Plans have been found unsound due to lack of certainty over infrastructure provision. To mitigate the risks we will be receiving ongoing advice from PINS as we progress further through the steps they have recommended.

15. Other Implications

Are there any implications for the following?		
	Yes	No
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.	X	
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	X	
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	X	

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.		
Safeguarding and Early Help		X
General Data Protection Regulations (GDPR)		X
Health and Wellbeing The NPPF states that planning policies and decisions should aim to achieve healthy, inclusive and safe places	X	

16. Appendices

- 16.1 Appendix 1 – PAS advice Note
- 16.2 Appendix 2 – Working Draft July 2021 note from Stantec on strategic transport matters
- 16.3 Appendix 3 – PINS Advisory Visit Note 16 July 2021
- 16.4 Appendix 4 - Updates from other infrastructure providers and key parties

17. Background Papers

- 17.1 None.

Appendix 4 – updates from other infrastructure providers and key parties

This appendix sets out the most recent responses from infrastructure providers and other parties to proposed development. It is worth noting that these responses were made in response to a distribution which would meet the needs of the Chichester plan area in full.

Environment Agency

The EA generally support development to the eastern side of the plan area due to the wastewater treatment capacity issues within the Apuldram catchment in the west. The EA confirm that new development should ideally look for connection to Tangmere WwTW. The EA is also pleased to see that proposed housing has been reduced on the Manhood Peninsula due to potential increased flooding from sea level rise and that site AL6 (land south west of Chichester) has been removed. The EA support the recognition that future development may need to be phased so that it aligns with infrastructure provision.

Natural England

The Local Plan should plan for the forecasted increased capacity demands on WwTW. Natural England understands that CDC are aware of the Nutrient Neutrality (NN) requirements involving the Solent, however would reiterate that the western stream area of Chichester contributes to the NN issue as it flows into the Solent - this also includes Chichester Harbour. The LPR provides a key opportunity for CDC to secure a Strategic Solution to NN.

Southern Water is unable to conclude no adverse effect on the integrity of the Arun Valley Special Area of Conservation (SAC) and Special Protection Area (SPA). Therefore Natural England advises mitigation measures (water neutrality) within the Sussex North supply area will need to be provided.

West Sussex County Council

WSCC identify insufficient primary capacity to accommodate the sites to the east of Chichester where land for a 2FE primary school would be required. Any development within Hunston and North Mundham parishes cannot currently be accommodated in the existing primary schools in the area. Further capacity would be required to accommodate the development. Bosham, Chidham and Hambrook, Southbourne and Westbourne are all within the same school planning area; the cumulative total of the strategic allocations brings forward a requirement for circa 3 forms of entry additional (primary) school places. Where contributions are required to provide additional capacity through expansion, particularly for secondary education, details are provided.

The RD strategy includes a number of sites which fall within the sharp sand and brick clay minerals safeguarding area or minerals consultation area. These designations do not prevent non-mineral related developments from taking place, but it does mean that the criteria set out in Policy M9 of the West Sussex Joint Minerals Local Plan (2018) must be met. Consultation with WSCC will also be required.

NB WSCC highways are considering the transport implications of the local plan through the ongoing transport modelling work with Stantec and hence no comment on transport matters is included here.

Southern Gas Networks

The potential sites within the IDP have been analysed on the Network Analysis Models to determine if any upgrades to the infrastructure are required to ensure security of supply and to maintain a safe operation of the gas network. At this time there is no requirement to reinforce the Intermediate or Medium Pressure tier systems. SGN cannot provide an assessment of the Low Pressure tier as can usually only be assessed when a connections enquiry/request comes in for a specific site, which details the exact connection point and the gas demand for the site. Therefore, it is possible that the Low Pressure tier could require localised reinforcement.

Southern Energy Power Distribution

SEPD did not provide any updates in 2020. In their previous response (2018) SEPD confirmed that they have no identified major spending plans. The projected increase in load growth is anticipated to be accommodated from existing capacity. There has been a reduction in loads in recent years, thought to be due to improved energy efficiency and the downturn in the economy.

Telecommunications

There are no updates in 2020. In 2018, it was confirmed that West Sussex County Council has contracted with BT Telecommunications plc to build the necessary communications infrastructure to provide improved broadband services. The £30million project is being funded by West Sussex County Council, the government and BT Telecommunications plc.

Thames Water

Given that the proposed distribution of development north of the plan area is centred on four parishes in the north-east, it is Thames Water's view that future developments are very unlikely to require connection into their network. Consequently, Thames Water has confirmed that they have no network constraints affecting the delivery of wastewater services in association with proposed development in the north of the plan area.