

Chichester District Council

Special Cabinet

23 January 2023

Proposed Submission version of the Chichester Local Plan 2021 - 2039

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2. Recommendation

2.1 That Cabinet recommends to Council that:

1. The Chichester Local Plan 2021 – 2039: Proposed Submission (Regulation 19) (attached as Appendix A), the Submission Policies Map (attached as Appendix B), Sustainability Appraisal (Appendix C) and Habitats Regulations Assessment (Appendix D) be approved for publication for a 6-week consultation from 3 February 2023 to 17 March 2023 under Regulation 19 of the Town and Country Planning (England) Regulations 2012 (as amended);
2. Following publication and consultation, the Chichester Local Plan 2021 – 2039: Proposed Submission (Regulation 19), the Submission Policies Map and supporting documents be submitted to the Secretary of State for examination, together with the representations made under Regulation 20 (in response to consultation at Regulation 19) and a summary thereof (as an update to the Statement of Consultation);
3. The Director of Planning and the Environment be authorised, following consultation with the Cabinet Member for Planning Services, to:
 - a. make minor amendments and any necessary editorial changes to the Chichester Local Plan 2021 – 2039: Proposed Submission (Regulation 19), the Submission Policies Map, the Sustainability Appraisal and Habitats Regulations Assessment, prior to publication, prior to submission and during the examination;
 - b. prepare the Council's response to the main issues identified and to any substantial concerns about soundness or legal compliance raised in the representations, to submit alongside the Plan;

- c. **if necessary, to prepare a Schedule of Main Modifications that may be necessary to address soundness issues raised by representations received in response to the Regulation 19 publication, that can be submitted with the Plan to be considered by the Inspector during the examination process;**
- d. **if necessary, to prepare a Schedule of Minor Modifications that may be necessary to address minor editorial and factual changes that do not go to the soundness of the plan that can be submitted with the Plan to be considered by the Inspector during the examination process.**

3. Background

- 3.1. Local plans provide the basis for planning for the sustainable development of communities. They set out a vision for the future, a framework for meeting identified needs and priorities and a way in which communities can shape their area. The responsibility for preparing local plans rest with local planning authorities, and it is a legal requirement to prepare a local plan.
- 3.2. The broad legal framework for the preparation of local plans is set out in the Planning and Compulsory Purchase Act 2004. The detailed regulations for preparing local plans are contained with the Town and Country Planning (Local Planning) (England) Regulations 2012. National planning policies, which local plans must be prepared in accordance with, are contained within the National Planning Policy Framework (NPPF) and associated planning practice guidance.
- 3.3. Chichester District Council is the local planning authority responsible for preparing a local plan in that part of Chichester District located outside of the South Downs National Park. Within the South Downs National Park, responsibility for preparing a local plan rests with the South Downs National Park Authority (the South Downs Local Plan was adopted in 2019).
- 3.4. The existing Chichester Local Plan: Key Policies 2014-2029 was adopted by the Council in July 2015. The Plan committed the council to review the Plan within five years of adoption to ensure that the development needs of the area continue to be addressed in accordance with national planning policy.
- 3.5. The Council must be satisfied that its Local Plan and its preferred development strategy does all it reasonably can to meet the development needs of the plan area in a sustainable manner that conforms with current national policy set out principally in the National Planning Policy Framework (NPPF).
- 3.6. A key objective of the NPPF is to significantly boost the supply of homes in England and ensure that growth is genuinely plan-led (Paragraph 60). It requires that, as a minimum, local plans should provide for an area's housing and other development needs, as well as any that cannot be met within neighbouring areas, unless the conditions set out in paragraph 11(b)(i) or (ii) are met.
- 3.7. The number of new homes the council is expected to plan for is set by the Government's standard methodology. The calculation for the Chichester plan area is 638 new homes per year.

3.8. Paragraph 11 of the NPPF states that:

“Plans and decisions should apply a presumption in favour of sustainable development.

For **plan-making** this means that:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas¹, unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type and distribution of development in the plan area² or
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.

3.9. With paragraph 11 in mind, the Council must be satisfied that its Local Plan does all that it reasonably can to meet the plan area development needs in a sustainable manner that conforms with current national policy.

3.10. Section 3 of the NPPF focuses on plan-making. Of particular importance is paragraph 20 which states:

“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision³ for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure);
and

¹ As established through statements of common ground

² The policies referred to are those in this Framework (rather than those in development plans) relating to habitats sites (and those sites listed in paragraph 1810 and/ or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

³ In line with the presumption in favour of sustainable development.

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation”.

3.11. The Local Plan will be examined by an independent Inspector appointed by the Secretary of State to assess whether it has ‘been prepared with legal and procedural requirements, and whether it is sound’. Paragraph 35 of the NPPF states:

“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs⁴; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with policies in this Framework and other statements of national planning policy, where relevant”.

3.12. The Local Plan must be prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This requires the Local Plan to be (amongst other things), subject to public consultation; submitted to the Secretary of State to undergo an independent examination; and subject to a Sustainability Assessment / Habitats Regulation Assessment to test the impacts of the Plan throughout its preparation.

3.13. The council must also demonstrate that it has met its obligations under the duty to cooperate on strategic matters.

3.14. The NPPF contains other important and relevant policies (e.g., relating to housing, economy, climate change), which must also be taken into account.

⁴ Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 61 of this Framework.

Plan preparation to date

- 3.15. Work commenced on reviewing the Local Plan in 2016, principally through an initial review of the existing evidence, the operation of the existing policies and a 'call for sites' exercise.
- 3.16. In June 2017 the council published an Issues and Options document for a six week period of consultation, beginning on 22 June and concluding on the 3 August 2017. Information and comments were sought on a series of matters to help the council develop the strategies and policies of the Local Plan which had an intended end date of 2034. At that time, views had not been formed on which sites and locations should be allocated for new development or the way in which existing policies should be updated. 2,221 representations were received in response to the consultation and a summary of the key issues raised is available on the council's website <http://www.chichester.gov.uk/chichesterlocalplan2034>.
- 3.17. On 20 November 2018, Council approved the publication of the Preferred Approach Local Plan along with supporting documents for an 8-week public consultation period. The Local Plan: Preferred Approach (2018) and supporting documents were subject to consultation from 13 December 2018 – 7 February 2019. This included proposals to fully meet the identified housing and employment needs of the area, and an allowance for accommodating unmet need from that part of the South Downs National Park which fell within the district.
- 3.18. A report to Cabinet and Council in December 2019 set out a summary of the representations received to 'Part 1' of the Local Plan: Preferred Approach (2018) (strategic policies) and the Council's proposed responses received, as well as setting out further technical work.
- 3.19. A total of just over 3,200 representations were made by 729 respondents to the Preferred Approach. The significant issues raised in response to the consultation included concerns over high levels of housing development, sustainability and deliverability of new housing. Concerns were also raised about the development strategy including the focus on the east-west corridor and also the impact of development on sensitive landscapes including the Chichester Harbour AONB and the South Downs National Park. Traffic congestion, in particular the A27, was also a concern, along with capacity of schools, health facilities and other infrastructure.
- 3.20. The suitability, sustainability and capacity of the strategic allocations and parish requirements to deliver the levels of development needed was also a concern, and the need for additional work on a number of sites and locations was identified in the report. This included, amongst other issues, the need to resolve the uncertainty around the deliverability of the proposed allocation at Land South West of Chichester, the impact of strategic wildlife corridors and the need to further consider the level of development in the northern plan area.
- 3.21. The report also set out the testing of two additional spatial distribution scenarios and the further technical work required including updating evidence and ongoing Sustainability Appraisal and Habitats Regulations Assessment as the plan progressed. The need for further technical work on transport was set out, in

particular: updating the Transport Assessment to consider, among other things, the implications of the removal of the proposed Stockbridge Link Road and further transport feasibility work on critical Local Plan mitigation works on the A27.

- 3.22. A further report to Cabinet and Council in March 2021 provided a summary of the consultation responses received for the 'Part 2' Development Management policies. The Local Development Scheme was updated in March 2021 and the report to Cabinet and Council (Cabinet 2 March 2021) set out the reasons for the need to amend the timetable - which included recognising that transport and the A27 were key considerations of the emerging Local Plan. The report set out that the findings of the updated Transport Study demonstrated that there were no alternatives to the Stockbridge Link Road, which then prompted the need for more detailed feasibility work. The report also highlighted the need for work to progress on a Statement of Common Ground with Southern Water to evidence their position on the capacity of wastewater infrastructure and the feasibility of expansion to serve new growth.
- 3.23. A 'Local Plan and Strategic Infrastructure Update' was considered at an 'All Member' Council Session on 29 July 2021 which set out the findings of the further transport work and wastewater discussions. The report set out the conclusions on transport matters following additional technical work and discussions with infrastructure funders. It concluded that the Stockbridge Link Road was not fundable or deliverable through the local plan process and should not be proceeded with unless or until there is a significant change in circumstances. Therefore, an alternative 'infrastructure constrained' approach to development was proposed as the way forward. Council agreed that: the full package of A27 mitigation measures would not be progressed (in the absence of significant external funding); that the Local Plan was unable to meet full housing needs; and that the strategy should focus on delivering as much development as possible based on 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.
- 3.24. The report to the 29 July 2021 All Member Session also provided updates on other infrastructure matters and advice from the Planning Inspectorate (PINS) advisory visit (July 2021).
- 3.25. In January 2022 an All Member workshop took place at which an approach to testing a distribution based on 535 dwellings per annum in the south of the plan area (9,630 over the plan period) was informally agreed. Following this, further transport evidence work has been undertaken, along with continuing discussions on the emerging approach with National Highways and West Sussex County Council as Local Highway Authority. This work has informed the proposed approach to transport set out in the publication version of the Local Plan.
- 3.26. Since July 2021, the discussions with Southern Water on wastewater infrastructure have also concluded, with a Statement of Common Ground on wastewater being agreed between the council, Southern Water and Environment Agency in November 2021.

3.27. The proposed Submission Local Plan has also taken into account changes to the NPPF since the Preferred Approach in 2018. The key changes to the NPPF include:

- Reference to improving the environment and mitigating and adapting to climate change in para 11.
- Policies for larger-scale development to look further ahead than the typical 15 year plan period.
- Strengthening of the national policy on design and achieving well designed places.
- Inclusion of all sources of flooding as part of the sequential test.

3.28. A consultation on the changes to the NPPF following the Ministerial Statement on the Government Amendments to the Levelling Up and Regeneration Bill (6 December 2022) was published on 22 December 2022. The proposed changes subject to the consultation include:

- Removing the requirement for LPA's with an up to date Local Plan to have to demonstrate a rolling 5 year housing land supply (HLS).
- Removing the requirement for a buffer on top of the 5YHLS.
- Increasing the protections for Neighbourhood Plans from 2 to 5 years where the LPA can show a 3YHLS.
- Retaining the standard method for assessing local housing need but as an advisory starting point and not mandatory.
- Simplifying the tests of soundness by which plans are examined
- Where draft Local Plans have been subject to a Regulation 18 or 19 consultation or submitted for examination, LPA's will benefit from a 4YHLS requirement (rather than 5 years), applying for 2 years from the point the revised NPPF takes effect.

3.29. As the proposed changes are currently out to consultation only, they may, or may not, be included in any final revised national policy/legislation, and should therefore not be relied upon in decisions made by the Council at this stage - the recommendations in this report are based on the current legislative and policy framework.

3.30. It is important that the Council continues to advance its local plan to the next stage of formation expeditiously, so that the Council is able to direct and deliver development to the most appropriate locations and with the necessary infrastructure. Moving the plan forward swiftly also provides the best chance of meeting the final provisions of any amended NPPF, and the benefits of greater control over speculative development, while the plan continues through the processes of examination and adoption.

4. Outcomes to be Achieved

4.1 The ultimate outcome of this work is to have adopted a sound and legally compliant Local Plan which provides strategies and policies to guide the sustainable development of the Chichester plan area through to 2039.

4.2 The purpose of consulting on the proposed submission Local Plan is to seek views on whether the strategies and policies it contains, and the evidence base that

underpins it, are legally compliant and sound, prior to submission of the plan for Examination.

5. Proposal

5.1 The following sections sets out a summary of the proposals within the proposed submission version of the Chichester Local Plan (see Appendix A) and highlight the main changes between the Regulation 18 draft and the Regulation 19 versions. The NPPF, the local plan evidence base, consultation responses and Duty to Cooperate discussions have all been used to inform the content of the Plan.

Main changes since the Preferred Approach

5.2 The Preferred Approach version of the Plan, had two parts:

Part 1 – the overall development strategy and relevant strategic policies to meet the future needs of the area. This included the spatial vision and strategic objectives, the spatial strategy and strategic policies for topics and sub-areas and strategic site allocations.

Part 2 – development management policies which provide the detailed policies to help guide development in general over the plan period.

5.3 The proposed submission Local Plan has been restructured by topic, so strategic and development management policies can be read together, rather than in two different sections of the Plan. As the strategic policies have to be identified in the Plan, the Plan includes Appendix G which lists the strategic policies.

5.4 The proposed new strategic development allocations have been amended:

- AL3 Land East of Chichester (now policy A8) – number of dwellings changed from 600 to 680
- AL5 Southern Gateway (now policies A4 and A5) – area of allocated land reduced due to deliverability issues – change from 350 to 180 dwellings
- AL6 Land to the South West of Chichester (33 ha employment land and 100 dwellings) - not being progressed due to deliverability issues.
- AL7 Land at Highgrove Farm (now policy A11) – number of dwellings changed from 250 to 245
- AL12 Land North of Park Farm, Selsey (250 dwellings) – not being progressed due to flood risk concerns
- New site allocation at Land at Maudlin Farm (policy A10) for 265 dwellings

5.5 The strategic development numbers (over 200) allocated to Parishes have been amended:

- AL10 Chidham and Hambrook Parish (now policy A12) – was 500 now 300
- AL13 Southbourne Parish (now policy A13) – was 1,250 now 1,050 and being progressed as a broad location for development (BLD)
- Chichester city (policy A2) – was 50 now 270
- Loxwood Parish (policy A15) – was 125 now 220

- 5.6 The following parishes that previously had strategic numbers have been amended and are no longer strategic in size (so do not have a separate policy in the Local Plan):
- AL8 East Wittering Parish – was 350 now 0
 - AL9 Fishbourne Parish – was 250 now 30
 - AL11 Hunston Parish - was 200 now 0
- 5.7 The non-strategic parish numbers are now proposed to be:
- Birdham – was 125 now 0
 - Boxgrove – 50 (no change)
 - Fishbourne – 30 (was 250)
 - Kirdford – was 0 now 50
 - North Mundham – 50 (no change)
 - Plaistow and Ifold – was 0 now 25
 - Wisborough Green – was 25 now 75
 - West Wittering – was 25 now 0
 - Westhampnett – was 50 now 0 (with strategic site allocation at Land at Maudlin Farm)
 - Westbourne – was 0 now 30
- 5.8 As set out above, the employment allocation on Land South West of Chichester is not progressing. In order to meet the employment need, this has been replaced by a new employment site:
- Land South of Bognor Road (policy A20)

Local Plan 2021-2039: Proposed Submission

- 5.9 A summary of each chapter is provided below, including how the key challenges have been addressed and the evidence that has informed the approach being proposed.

Chapter 1: Introduction

- 5.10 This chapter sets out the purpose of the Plan, how to use the Plan, the policy context, relationship between neighbourhood plans and the Local Plan, a summary of the duty to cooperate and the roles of the South Downs National Park Authority and West Sussex County Council. It also explains how the plan has been developed and explains the policies map (which will be updated on adoption of the Local Plan and when neighbourhood plans are 'made').

Chapter 2: Vision and Strategic Objectives

- 5.11 This chapter includes the Spatial Portrait which describes the key characteristics of the area and identifies the challenges and opportunities that the Plan seeks to address, for example, addressing climate change and meeting employment and housing needs. It includes the Vision which describes the sort of place that the plan area should be by 2039, including setting out the emphasis for each sub area. To help deliver this vision a suite of 7 Strategic Objectives are identified. The Strategic Objectives cover: climate change, natural environment, housing, employment and economy, health and wellbeing, design and heritage and strategic infrastructure. The Vision and Objectives also reflect the long-term cross boundary Strategic Objectives

and Spatial Priorities identified in the Coastal West Sussex and Greater Brighton Local Strategic Statement (LSS2).

Chapter 3: Spatial Strategy

- 5.12 The Spatial Strategy outlines the broad approach that will be followed towards managing growth and change across the plan area, informed by the Vision and Strategic Objectives.
- 5.13 The spatial strategy has been informed by a range of factors including:
- The sub-regional planning context, in particular, the Local Strategic Statement (LSS2) for West Sussex and Greater Brighton.
 - The overall vision and objectives for the plan area and for the different sub-areas and settlements within it.
 - The pattern of need and demand for housing and employment across the area.
 - Infrastructure capacity and constraints, in particular relating to wastewater treatment, roads and transport.
 - Environmental constraints – taking a sequential approach to avoiding flood risk areas, protecting environmental designations, landscape quality, the historic environment and settlement character.
 - The availability of potential housing sites, their deliverability and phasing.
 - Public consultation and the sustainability appraisal of options and policies.
- 5.14 As the Plan has evolved, various distribution strategies have been considered and tested, in order to address the A27 and other potential constraints to growth, such as flood risk. The spatial strategy has been informed by the settlement hierarchy, which identifies the role of each settlement within a hierarchy, based on the presence of certain facilities and services. The spatial strategy also avoids development within or close to designated landscapes (Chichester Harbour AONB and the South Downs National Park). The spatial strategy is illustrated on the key diagram.
- 5.15 The spatial strategy for delivering growth and development is to focus on Chichester city as the main sub-regional centre and most sustainable location with a wide range of services and facilities. Focusing growth within and close to the city will reinforce its role as a sub-regional centre. The allocations of land within the Southern Gateway area for 180 dwellings and a new employment allocation at Land South of Bognor Road, in addition to a strategic parish number for Chichester (270), will enhance the role of the city within the sub-region. The spatial strategy also focuses on the areas close to Chichester with the strategic development locations at Land West of Chichester, Land at Westhampnett/North East Chichester and Land at Shopwhyke carried forward from the 2015 Local Plan. The new allocation proposed at Land East of Chichester for 680 dwellings will continue this pattern of sustainable growth close to the city. Growth is also proposed for Westhampnett, at Maudlin Farm for 265 dwellings, which reflects its role as a service village with good connectivity to Chichester city.
- 5.16 The remaining strategic level growth is largely focussed within the east-west corridor at the settlement hubs, with the proposed broad location for development (BLD) at Southbourne for 1,050 dwellings and the strategic development location (SDL) at Tangmere for 1,300 dwellings carried forward from the 2015 Local Plan. Moderate

growth is also proposed for the service villages of Bosham/Broadbridge (Land at Highgrove Farm, 245 dwellings), Chidham and Hambrook (a parish number of 300) and lower growth at Fishbourne (parish number of 30). Low growth is also proposed for the service villages of Westbourne (30 dwellings) and Boxgrove (50 dwellings).

- 5.17 The Preferred Approach version of the Local Plan included moderate growth for the settlement hubs of Selsey (250 dwellings) and East Wittering (350) and the service village of Hunston (200). However, since then several allowed planning appeals will result in moderate levels of growth on the Manhood Peninsula. The proposed submission version of the Local Plan does not include any strategic allocations on the Manhood Peninsula in recognition of this recently permitted growth and the ongoing constraints that the area faces, particularly flood risk, but does include 50 dwellings to come forward through the neighbourhood planning process at North Mundham (which will likely be made up from sites which will have received planning permission after the base date of the plan).
- 5.18 The spatial strategy for the southern plan area has been supported by the evidence base and the Sustainability Appraisal (SA) has considered reasonable alternatives. The SA included 7 alternative scenarios in the south with differing spatial distributions and growth levels. The main variables were in relation to the level of growth at Southbourne, the level of growth in Westhampnett and higher growth in Chidham and Hambrook parish or at Birdham, Hunston and North Mundham. Whilst higher growth at Southbourne scored well in the appraisal, concerns around deliverability within the Plan period due to the timing of solutions to wastewater constraints, mean that the scenario set out in the publication Plan is a justified approach. This approach also scored favourably when compared to the other scenarios appraised.
- 5.19 In the north of the Plan area, previously, given it is less sustainable compared to Chichester and the east-west corridor, the Local Plan has only provided for only limited growth, focused on enabling these communities to continue to sustain local facilities and contribute towards meeting locally generated housing needs, and support for the rural economy, in line with the settlement hierarchy. However, due to the constraint of the A27 in the south of the plan area (see housing section at para 5.34 onwards below), it is considered that this Plan should provide for a moderate level of growth in the north to help to make up the overall shortfall of dwellings, in order to demonstrate that 'no stone has been left unturned' in identifying housing supply.
- 5.20 High levels of growth were considered at Loxwood, Kirdford, Wisborough Green and Plaistow and Ifold, but ruled out due to the need to conserve the rural character of the area and its high quality landscape and to minimise the impact on the historic environment. The spatial strategy therefore includes growth at Kirdford (50 dwellings), Wisborough Green (75 dwellings) and Plaistow and Ifold (25 dwellings). Loxwood is the least constrained settlement in the north of the plan area, and benefits from the most services and facilities, including healthcare. Therefore, a moderate amount of growth is appropriate for Loxwood of 220 dwellings, to come forward through the neighbourhood planning process.
- 5.21 The SA of the northern options considered 3 scenarios (plus each scenario with the addition of a potential new settlement at Crouchlands), for low, higher and highest growth. The highest growth scenarios perform poorly and therefore the Local Plan reflects a combination of the low and higher growth scenarios tested, which takes into

account the constraints of each settlement and the need to avoid cross boundary traffic and education impacts. A new settlement at Crouchlands has been ruled out as it is not of a sufficient size to be a sustainable new settlement in a rural location and because of the negative impact on the landscape and intrinsic rural character of the area and poor sustainable transport links.

- 5.22 The infrastructure requirements to support the spatial strategy and further detail on the proposed allocations is set out in the transport and infrastructure sections below.

Chapter 4: Climate Change and Natural Environment

- 5.23 The climate change and natural environment chapter is a large chapter in the Plan, which reflects the importance of the natural environment in the plan area. The policies in this chapter seek to meet Strategic Objective 1: Climate Change (contributing towards a reduction in greenhouse gas emissions to achieve net zero by 2050) and Strategic Objective 2: Natural Environment (to protect and enhance the natural environment and achieve net gains in biodiversity, nature recovery and tree cover, as well as improving the condition of designated sites and protecting wildlife and landscape character).
- 5.24 The importance of protecting designated landscapes is reflected in the Natural Landscape policy and the Landscape Gaps between Settlements policy protects undeveloped gaps between settlements to prevent coalescence. The boundaries of gaps will be defined either through neighbourhood plans or through the Site Allocation DPD and will be informed by the Landscape Gap Assessment (2019) and any more detailed or updated assessments if needed and/or evidence gathered to support neighbourhood planning.
- 5.25 A key component of the Plan, which has been reflected in the spatial strategy, is the identification of strategic wildlife corridors (SWC), the protection of which will allow the movement of species between areas of habitat, especially between the coast and the South Downs, preventing the fragmentation of habitats. The extent and boundaries of the wildlife corridors have been amended following further information and data (which was the subject of a technical consultation from 30 July 2021 – 10 September 2021).
- 5.26 The Plan seeks a minimum of 10% net gain in biodiversity and ensures the conservation, protection, enhancement and recovery of all types of nature conservation sites, habitats and species, including local, national and internationally designated sites.
- 5.27 The presence of several internationally designated sites led to delays in the Plan making process, as evidence was required to address nutrient neutrality in Chichester and Langstone Harbour SPAs and water neutrality in the relation to the Arun Valley SPA and SAC.
- 5.28 The requirement for nutrient neutrality is because of declining water quality in Chichester and Langstone Harbour SPA/Ramsar as a result of excess nitrates causing algal growth which is harmful to wildlife. Any new development involving over-night stays within the catchment area will need to demonstrate that any discharge into the harbour will be nutrient neutral for the lifetime of the development. A 'nutrient budget' for the Local Plan has been prepared in accordance with Natural

England's methodology to demonstrate that there is sufficient mitigation available for the first 5 years of the plan period. The approach to nutrient neutrality has been developed with the Partnership for South Hampshire (PfSH) and other authorities affected by this issue.

- 5.29 In relation to water neutrality, Natural England advised, through a Position Statement published in September 2021, that existing abstraction within the Sussex North Water Supply Zone may be having a negative impact on the Arun Valley SPA/SPA/Ramsar sites. New development must not add to this negative impact. This means that development located within the Sussex North Water Supply Zone will have to demonstrate that it will not increase pressure on water resources. This can be achieved by making development "water neutral", where, for every new development, total water use in the region after the development must be equal to or less than the total water use in the region before the new development. The council has worked jointly with the affected planning authorities, including Crawley Borough and Horsham District councils to develop a mitigation strategy (Water Neutrality Study Part A, July 2021, Part B – In combination Final Report, April 2022 and Part C – Mitigation Strategy, November 2022) to address this issue. The policy requires water efficient design of buildings (no more than 85 litres of water per person per day) and off-setting of water use to demonstrate no net increase in water use. The mitigation strategy also involves water company demand management measures being undertaken. A cross boundary off-setting scheme is being developed by the local planning authorities which will provide developers with 'off-setting credits' to meet their off-setting requirements. The mitigation strategy set out in the Part C of the Study has been endorsed by Natural England
- 5.30 Wastewater treatment capacity has been a challenging issue during the plan making process, as timely upgrades to waste water infrastructure are necessary to manage the increased wastewater from planned housing growth. The council has worked with Southern Water and the Environment Agency to agree a Statement of Common Ground (November 2021) which sets out how the parties will work together to ensure that planned investment in wastewater infrastructure aligns with needs arising from new development in the plan area.
- 5.31 This chapter also includes a policy which recognises the importance of development around the coast being set back, and a policy ensuring an integrated coastal zone management approach for the Manhood Peninsula.
- 5.32 This chapter includes policies to protect amenity and health – covering pollution, lighting, air quality, noise and contaminated land.
- 5.33 Of particular importance to the southern plan area is risk from flooding both now and in the future. The council's Strategic Flood Risk Assessment (SFRA) (level 1 and level 2) has been updated and a sequential test and exception test undertaken, which has informed the spatial strategy, Sustainability Appraisal and selection of site allocations and parish numbers. The policy on flood risk and water management requires site specific flood risk assessments where relevant and also sets out the requirement for sustainable drainage systems. A further update to the SFRA will be required to address the changes to the Government's Planning Practice Guidance on flood risk published in August 2022.

Chapter 5: Housing

- 5.34 The Preferred Approach consultation on the Local Plan was based on meeting the identified objectively assessed housing needs of the plan area of 638 dwellings per annum⁵ (dpa) plus an allowance for accommodating unmet need arising from the Chichester District part of the South Downs National Park.
- 5.35 However, constraints, particularly the capacity of the A27 has led to the council planning for a housing requirement below the need derived from the standard method. The Plan proposes to deliver 535 dpa in the southern plan area and a further 40 dpa in the northern plan area, a total supply of 10,350 dwellings over the plan period from 2021 – 2039 (575 dpa). As a result of not meeting the identified housing needs, the council is now unable to accommodate any unmet need from the part of the South Downs National Park within Chichester District. The justification for not meeting the need is set out in more detail under Chapter 8: Transport.
- 5.36 In order to meet the requirements of the ‘duty to cooperate’ the council has approached neighbouring and other authorities to see whether they may be able to meet any of Chichester’s unmet needs. Most of the neighbouring authorities are faced with similar constraints and are unable to assist. Discussions are continuing with East Hants and Arun but the former is some distance from Chichester and is more suitable for meeting unmet needs from Havant, and Arun faces similar issues with the capacity of the A27. More details in respect of the duty to cooperate is set out below.
- 5.37 The plan period runs from 2021 – 2039 (18 years). To ensure a continuous supply of housing over the plan period, a number of sources of supply have been identified. These include new strategic allocations made in this Plan, retained allocations from the adopted Local Plan 2014-2029 and the Site Allocation DPD, existing commitments, sites to be identified at a parish level through neighbourhood plans (or Stie Allocation DPD) and sites not yet identified that are likely to come forward through the development management process in accordance with the policies of this Plan (‘windfalls’). Table 1 provides a breakdown of the housing supply.

Table 1: Meeting Housing Needs

Category		Number of dwellings	
Housing requirement for the full Plan Period (1 April 2021 to 31 March 2039)		10,350	
Housing supply (1 April 2021 to 31 March 2039)	a. Completions 1 April 2021 - 31st March 2022	712	
	b. Known commitments (<i>comprising</i>)	5,674	
	<i>Outstanding 2015 Local Plan⁶ and Site Allocation 2018 DPD allocations⁷ without planning permission</i>	2,210	
	<i>Outstanding 'made' Neighbourhood Plan allocations without planning permission</i>	100	

⁵ Housing and Economic Development Needs Assessment (April 2022)

⁶ Carried forward in this Local Plan (see Policy H2 Strategic Locations/ Allocations 2021 – 2039)

⁷ Including 10 dwellings allocated at Land North of Little Springfield Farm, Ifold (Policy PL1 of Site Allocations DPD 2014-2029)

	<i>Planning permissions as of 1 January 2023⁸</i>	3,364	
	New Strategic Locations/Broad Location for Development and Allocations	3,210	
	<i>c. Remaining figure without planning permission</i>		3,051
	Non-strategic Parish Housing Requirements	310	
	<i>d. Remaining figure without planning permission</i>		260
	e. Windfall (small site allowance)		657
	Total supply for the full Plan period (1 April 2021 to 31 March 2039) (=a+b+c+d+e)		10,354

5.38 The table above shows that out of the housing that is required, over half will be from known commitments and completions (6,386), with the remainder to come from new proposed strategic locations/ allocations (3,051), non-strategic parish housing requirements (260) and a small site windfall allowance (657). It should be noted that the table includes (in the left hand column) the total dwellings that the new strategic locations/ allocations listed in policy H2 of the Plan and the non-strategic parish numbers will contribute to the supply. However, where permissions have been granted since 1 April 2022 within a parish with a strategic or non-strategic number (to be delivered through the neighbourhood planning process), these will count towards the overall figure.

5.39 To deliver the housing growth strategy, the Local Plan includes a combination of strategic allocations carried forward from the 2015 Local Plan, new strategic site allocations, a broad location for development (BLD) and strategic and non-strategic parish numbers. The detail of these is as follows:

5.40 Strategic site allocations are carried forward from the 2015 Local Plan:

Location	Dwellings
Land at Shopwyke	585
Land at Westhampnett/ North East Chichester	500
Tangmere Strategic Development Location	1,300 ⁹
West of Chichester	1,600

5.41 The following new strategic sites are allocated:

Location	Dwellings
Land at Highgrove Farm, Bosham	245 ¹⁰
Land East of Chichester	680
Land at Maudlin Farm, Westhampnett	265

⁸ Does not include planning permissions on small sites (1-4 dwellings) permitted after 1st April 2022 as these are included in the windfall allowance.

⁹ Additional 300 over previous allocation of 1,000.

¹⁰ An additional 245 to the 50 allocated in the Policy BO1 Site Allocation DPD 2014 – 2029 (total of 295)

Southern Gateway	180
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5.42 A broad location for development (BLD) is identified as follows, with the allocation of a site within the BLD to be identified through either the neighbourhood planning process or subsequent Site Allocation DPD:

Location	Dwellings
Southbourne Broad Location for Development	1,050

5.43 The following strategic locations (over 200 dwellings) have been identified where neighbourhood plans are anticipated to be prepared to identify the sites required:

Location	Dwellings
Chichester City	270
Nutbourne and Hambrook (Chidham and Hambrook Parish)	300
Loxwood	220

5.44 Small scale housing sites will be identified to help provide for the needs of local communities in accordance with the parish housing requirements set out below. Suitable sites will be identified either through neighbourhood plans or a subsequent development plan document. Note that a “*” against a parish name indicates that a strategic allocation/ broad location for development is identified or strategic location for development is made (as set out above).

Parish	Housing Figure	Parish	Housing Figure
Apuldram	0	Birdham	0
Bosham*	0	Boxgrove	50
Chichester City*	0	Chidham and Hambrook*	0
Donnington	0	Earnley	0
East Wittering	0	Fishbourne	30
Funtington	0	Hunston	0
Itchenor	0	Kirdford	50
Lavant	0	Loxwood*	0
Lynchmere	0	North Mundham	50
Oving*	0	Plaistow and Ifold	25
Selsey	0	Sidlesham	0
Southbourne*	0	Tangmere*	0
West Wittering	0	Westbourne	30
Westhampnett*	0	Wisborough Green	75
		Total	310

5.45 The Plan sets out that if draft neighbourhood plans making provision for at least the minimum housing numbers of the relevant area have made demonstrable progress the council will allocate sites for development within a Development Plan Document in order to meet the requirements of the Plan.

- 5.46 The planned level of housing growth does not include a buffer due to constraints on the A27.
- 5.47 National policy requires local planning authorities to demonstrate a continuous five-year supply of deliverable housing sites, which must be updated annually. The council's current housing land supply position (as of 1st April 2022) is 4.74 years, measured against the local housing need of 638 dwellings per annum plus a 5% buffer. Accordingly, the council cannot demonstrate the five-year housing supply for the purposes of paragraph 11 of the NPPF. It is important that the council is able to identify a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against the housing requirement in the plan on adoption. The proposed trajectory is set out in Appendix E of the Plan and this shows that the council can demonstrate a 5 year supply on adoption of the Plan.
- 5.48 The proposed trajectory illustrates the expected rate of housing delivery and will ensure the maintenance of a 5 year supply during the plan period. The early years of the plan period are reliant on continuing supply from the strategic development locations carried forward from the 2015 Local Plan, with proposed new allocations and parish housing figures to come forward later in the plan period.

Affordable Housing

- 5.49 The Housing and Economic Development Needs Assessment (HEDNA) 2022 confirms that house prices are 14 times the average earnings for those working in the district and that there is a need for approximately 200 social and affordable rented houses per annum for the plan area (to 2039).
- 5.50 The Plan will require that 25% of the affordable housing provision is to be made up of first homes (discounted by a minimum of 30% against market value with the first sale price no higher than £250,000). The remaining affordable provision will be made up of a mix of affordable rent (22%)/social rent (35%) and shared ownership (18%).
- 5.51 The proportion of affordable dwellings required from sites of 10 dwellings or more, or of 0.5 ha or more is higher in the north of the plan area at 40% on greenfield sites and 30% on previously developed land. This is because development viability is higher in the north of the Plan area. In the south, the proportion required is 30% on greenfield sites and 20% on previously developed land.
- 5.52 The Plan sets out the mix of sizes and types of dwellings needed, but this should reflect the latest HEDNA at the time planning applications are considered by the council. The council has a requirement to meet the need for custom and self-build plots. The Plan seeks to address this through the provision of plots on new strategic allocations, requiring any strategic scale windfall sites to make provision, encouraging provision through neighbourhood planning and if necessary, there will be the opportunity to consider provision of sites through the new Site Allocation DPD.

Specialist accommodation and accessibility

- 5.53 The Plan includes a policy to support rural and first homes exceptions sites. There is also a considerable need for specialist accommodation for older people and those with specialised needs, and therefore provision of suitable housing options is

necessary. The Plan requires provision of specialist accommodation (including a support or care component) on sites of over 200 units, including the new strategic allocations. A criteria-based policy supports the provision of older peoples accommodation and also other specialist housing needs; including for students, houses in multiple occupation and essential worker accommodation. Due to the high level of need for older peoples accommodation, this may also need to be considered through the Site Allocation DPD.

- 5.54 In addition to specific older persons accommodation, the Plan also requires that 5% of affordable dwellings must meet the wheelchair accessibility standards (M4(3)(2)(b)) where there is an identified need on the Housing Register. The Government has consulted on an amendment to the building regulations which would mean that all new dwellings will have to meet the M4(2) accessible and adaptable standard. As this is likely to become a requirement prior to the adoption of the Plan, this new standard has been included, meaning that the remainder of dwellings on a site (once the wheelchair dwellings have been considered) will need to meet the M4(2) standard.
- 5.55 A separate policy provides criteria for assessing accommodation for agricultural, horticultural and other rural workers to support rural based enterprises.

Gypsy and Traveller and Travelling Showpeople

- 5.56 The Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) establishes the need for gypsy and traveller and travelling showpeople pitches/plots within the plan area. The Local Plan must meet the needs of gypsies and travellers for the first 10 years of the plan period (and ideally the whole 15 years), with deliverable pitches available to meet the need within the first 5 years. A lack of 5-year supply of pitches at examination would mean that the council is not in accordance with national policy.
- 5.57 The additional pitch requirements in the plan area to accommodate gypsies and travellers is:

	2024 - 29 ¹¹	2029 – 34	2034 – 2039	Total
Households who meet the Planning policy for traveller sites (PPTS) definition ¹²	90	17	17	124
Households whose status is unknown but may meet the definition	3	1	2	6
People living in caravans but established in the GTAA as not meeting the definition.	20	4	4	28

¹¹ This includes the figure from the base date of the GTAA, which is 2022, so this period is effectively a 7 year period.

¹² This category includes a proportion of the undetermined need (30%), as per the methodology used by the consultants who produced the GTAA.

5.58 The additional plot provision required in the plan area to accommodate travelling showpeople is:

	2024 – 29	2029 – 34	2034 – 2039	Total
Households who meet the PPTS definition	24	4	5	33
Households whose status is unknown but may meet the definition	2	2	3	7
Travelling showpeople established in the GTAA as not meeting the definition.	0	0	0	0

5.59 The new Local Plan will employ a range of options in order to meet the very high level of need for gypsies and travellers. The Plan will provide pitches on the strategic housing allocation sites, support intensification of some existing authorised sites which have been assessed as being acceptable in principle for additional pitches and allow pitches to come forward on a case-by-case basis. The council will also consider allocating additional pitches via the Site Allocation DPD. Existing permanent authorised sites for gypsies and travellers are to be safeguarded.

5.60 The anticipated supply from new strategic housing allocation sites (which is anticipated will be provided in clusters of 3-4 pitches) is 27:

- Land East of Chichester – 9 pitches
- Land at Highgrove Farm – 3 pitches
- Land at Maudlin Farm – 3 pitches
- Southbourne broad location for development – 12 pitches

5.61 Southern Gateway has not been assigned pitches, given that it is an urban site, and is constrained by flood risk, consequently, the site area is likely to be limited and the form of development is likely to be fairly high density, which would not be compatible with the provision of traveller pitches.

5.62 The following sites are identified as suitable for intensification

- Land at Cherry West, 1 pitch
- Land at Lakeside Barn, 4 additional pitches
- Tower View Nurseries: North/South, 1 pitch, Connors/Scant Road East 1 pitch
- Greenacre, 4 pitches
- Sunrise, Southbourne, 1 pitch
- The Stables on Bracklesham Lane, 1 additional pitch
- Five Paddocks Farm, Bracklesham, 2 additional travelling showpeople plots (temporary consent/s owing to future flood risk).

5.63 The overall position in relation to gypsies and travellers is that provided all reasonable sources of supply are accepted as valid at the examination then it is possible to nearly meet the 5 year need requirement in relation to those travellers who meet the Planning Policy for Traveller Sites (PPTS) definition. More specifically, available supply is currently 89 pitches vis-à-vis the need of 90 (this would comprise post 2021

consents, vacant pitches, intensification sites referred to above and a windfall allowance). Consequently, one more consent before submission would be sufficient to meet the PPTS need. However, currently, it would not be possible to meet the needs of all travellers over the first 5 years of the plan period i.e. including travellers who do not meet the definition within PPTS as while their needs do not have to be met in relation to PPTS they still have to be met as per the requirements of the NPPF.

- 5.64 Requests have been made via the duty to cooperate with respect to that unmet short-term need. Assuming that the unmet need cannot be met elsewhere, that shortfall would need to be made up later on in the plan period, either through the strategic housing allocations, new allocations via the Site Allocation DPD or windfall, and those mechanisms would also need to meet the remainder of the need for the rest of the plan period. The latest position is set out in the Duty to Cooperate Statement of Compliance (see Appendix F)
- 5.65 In terms of travelling showpeople, whilst this need is not as high, it is challenging to meet, especially as there are significantly fewer options in terms of site delivery, and in general terms it is difficult to provide showpeople sites owing to the amount of storage space which is usually required. Provision for 12 plots is proposed as part of the Southbourne BLD in order to meet local need within that parish, as it includes the main existing site within the plan area. Provision is also proposed on the Land South of Bognor Road employment site, which is considered acceptable as need is being generated via an existing site (Cole's Yard) on a neighbouring employment area off Bognor Road. Two plots are proposed as intensification of an existing site on Bracklesham Lane on the edge of East Wittering, though this may need to be temporary consent/s in recognition of future flood risk in the area. There is also likely to be some additional supply from windfall sites, which has averaged 2 plots per annum over the last 10 years. It is proposed that any windfall in Southbourne should be subtracted from the requirement on the BLD.
- 5.66 The overall position in relation to travelling showpeople is that the 5 year need cannot be met, as the sources of supply referred to above will come forward later in the plan period. Requests have been made under the duty to cooperate, but any residual need from this period will need to be addressed as much as possible via windfall and the Site Allocation DPD (if suitable sites are promoted). With windfall included it is likely to be possible to get very close meeting the identified needs over the plan period. It is considered that the council have done all that we reasonably can in this regard and will need to commit to seeking to allocate additional plots through the Site Allocation DPD if additional suitable sites can be identified.

Chapter 6: Place-making, Health and Wellbeing

- 5.67 The place-making, health and wellbeing chapter contains the policies needed to deliver the Strategic Objective 5: Health and Wellbeing (to encourage and enable healthy and active lifestyles for all) and Strategic Objective 6: Design and Heritage – Ensuring Beautiful Places, which aims to create safe and beautiful places, protecting and enhancing heritage and character with high standards of design.
- 5.68 The Plan includes a suite of detailed development management policies aimed at securing high quality design which reflects the National Design Guide. These include making sure development:

- respects local character and distinctiveness,
- makes efficient use of land through appropriate densities,
- is accessible and well laid out making it easy to navigate and legible,
- delivers high quality open spaces and landscaping,
- protects amenity of existing residents and provides good levels of amenity for future residents,
- uses high quality, attractive, durable and robust materials

5.69 The Plan will also ensure that all building alterations and extensions deliver good design in keeping with the local character.

5.70 The historic environment policies will ensure that development conserves or enhances the historic environment, with specific policies on:

- listed buildings
- conservation areas
- non-designated heritage assets
- registered parks and gardens

5.71 A key part of achieving the health and wellbeing Strategic Objective, is the provision of Green Infrastructure (GI). GI is the multi-functional network of natural and semi-natural features in urban and rural areas, including, for example, river corridors, woodlands, farmland, wildlife corridors, public rights of way and greenspaces. The GI policy requires the provision of additional green infrastructure and the protection and enhancement of existing green infrastructure as part of new residential development.

5.72 Open space, sport and recreation are also important to wellbeing and healthy lifestyles and the Local Plan policies protect, enhance and provide new open space, sport and recreation facilities, either on development sites (for example children's play areas) or through contributions (for example towards indoor sports facilities). The Open Space, Sport and Recreation Study (including indoor facilities and Playing Pitch Strategy) (2018) has informed the recommended on-provision standards for open space, sport and recreation facilities in the Local Plan. A specific health and wellbeing policy will also contribute to the health and wellbeing objective.

Chapter 7: Employment and Economy

5.73 The Local Plan needs to positively plan for sustainable economic growth, through identifying and meeting the anticipated employment needs over the plan period. The Housing and Economic Development Needs Assessment (HEDNA) considers the amount of employment land needed, based on labour demand and past trends, but with an allowance for flexibility, replacement of some losses and an adjustment for Covid. The HEDNA recommends between 108,000 and 115,000 sqm of employment floorspace is provided for between 2021 and 2039, comprised of between 36,500 and 43,000sqm of office space, 50,500sqm of industrial space and 21,000sqm of warehousing (all rounded to the nearest 500sqm).

5.74 The Local Plan makes provision for the identified needs through a combination of different sources, including from completions and pipeline supply. In addition, employment is provided for through carrying forward some allocations from the Local Plan Key Policies 2014-29, where the employment space has not yet all been delivered:

- Land West of Chichester 22,000sqm
- Land at Chichester Business Park, Tangmere 92sqm

The following site allocation in the Site Allocation DPD 2014 – 2029 is also carried forward:

- Land at Kingsham Road¹³– 7,200sqm office space

A new allocation is proposed at:

- Land south of Bognor Road 28,000sqm

In addition, provision is made within some of the new strategic site allocations (including Land East of Chichester) for flexible working space to be provided within local centres/community hub buildings, and local provision will also be made through neighbourhood plans, and at the Southbourne Broad Location for Development.

Category		Floorspace (m2)
Employment floorspace requirement for the full Plan period (1 April 2021 to 31 March 2039)		
<i>Identified need from HEDNA</i>		108,000 to 115,000
Identified sources of supply		
Employment floorspace completions (1 April 2021 to 31 March 2022)		3,695
Floorspace supply (1 April 2022 to 31 March 2039)	Permissions	53,655
	Allocations in Site Allocations DPD	7,200
	Proposed allocations in this Plan (see Strategic Site Allocations Chapter)	
	Brought forward from adopted plan (remaining employment space without permission): Land West of Chichester	22,000
	Chichester Business Park New allocations: Land South of Bognor Road	92 28,000
Total supply for the full Plan period (1 April 2021 to 31 March 2039)		114,652

¹³ Policy CC5 Boys High School, Kingsham Road (Site Allocations DPD 2014 – 2029)

- 5.75 Land is also safeguarded to the east of the existing Rolls Royce site to allow for future expansion of operations.
- 5.76 The Plan continues to support the horticultural industry by making provision for land to meet the future horticultural development need for the plan period. Approximately, 67 hectares is identified as necessary to meet the future horticultural land need within Horticultural Development Areas (HDAs) over the plan period. However, given the historical pattern of horticultural development outside of HDAs, an additional 137 hectares of horticultural land is also forecast to be required outside of HDAs to meet future need.
- 5.77 The requirement for 67 ha will be met through capacity at the existing Horticultural Development Areas (HDAs) at Tangmere (38ha), Runcton (9ha) with small-scale horticultural development with the Sidlesham and Almodington HDAs. The remaining horticultural development need will be accommodated in a planned extension at the southern boundary of Runcton HDA which comprises some 30 hectares of land. An area of the Runcton HDA has also been deleted. The need outside of the HDAs (approximately 137 ha) would be met through consideration of proposals against policy E4.
- 5.78 The NPPF requires that policies support the role that town centres play at the heart of local communities. Chichester city is defined in the Plan as a sub-regional centre, with local centres identified at Selsey and East Wittering, with Tangmere to be developed as a local centre as the strategic development location is developed. A town centre boundary has been defined for Chichester city and this will be the basis for applying the sequential test. The primary shopping area for the city centre is retained as the focus for retail development. Primary and secondary frontages are to be retained in Chichester city centre.
- 5.79 The Retail Study Update (2022) identifies a floorspace requirement of 6,600 sq m (gross) of comparison and convenience retail floorspace and food/beverage uses across the Local Plan area up to 2039. This will primarily be met through the re-occupation of vacant floorspace as well as limited new retail development within strategic housing sites. The plan will also work alongside the Chichester Vision to help support the day and night-time economy.
- 5.80 Another important part of the economy of the Plan area is tourism and leisure development. The Built Tourist and Leisure Development policy sets out the criteria that need to be met to ensure that development is appropriate and balanced against the high environmental quality of the Plan area.

Chapter 8: Transport and Accessibility

- 5.81 Promoting sustainable transport is a key requirement of the NPPF and plan policies need to ensure that the potential impact of development on transport networks can be addressed, as well as maximising opportunities to promote walking, cycling and public transport and addressing the environmental impacts of traffic and transport infrastructure. The impact of traffic growth on the network in terms of capacity and congestion needs to be assessed and mitigated.

- 5.82 Road congestion is a major issue affecting parts of the plan area, particularly within Chichester City and the junctions on the A27 Chichester Bypass. The problems are most acute during peak travel periods, and this causes knock-on effects in terms of delays and diversion onto less suitable roads, and road safety issues. Congestion at the A27 junctions and the level crossings on the West Coastway railway line act as a barrier to movement around the city, and between the city and the Manhood Peninsula to the south. Transport movements and traffic congestion have a detrimental impact on air quality in the city, which has resulted in the designation of an Air Quality Management Area (AQMA) located at St Pancras, Chichester.
- 5.83 The more rural parts of the plan area face different transport challenges. In particular, there is a high reliance on car travel to access key services and facilities, with limited public transport services.
- 5.84 As set out in the background section of this report, the significant cost of the required A27 junction improvements is not capable of being funded through development contributions alone, and no other sources of potential funding are currently available. The estimated costs for the A27 junction improvements are:
- Fishbourne Roundabout with the Terminus Road Link between £9.5 and £12.9 million
 - Bognor Road Roundabout with the Vinnetrow Road Link between £19.4 and £30.4 million
 - Stockbridge Roundabout and Whyke Roundabout with Stockbridge Link Road between £57.23 and 82.79 million
- 5.85 At a national level, previous proposals to deliver a national roads scheme via the Government's Road Investment Strategy (RIS1) on the A27 at Chichester were cancelled by the Secretary of State for Transport in February 2017 due to a lack of consensus locally. National Highways have included the A27 Chichester Bypass improvements as a 'pipeline scheme' for possible inclusion in the 3rd Road Investment Strategy (RIS 3) but at this early stage there is no certainty that funding will be secured to enable reliance on a government funded solution in planning future development.
- 5.86 The council has therefore worked with National Highways and the County Council to identify a coordinated and deliverable package of transport measures and principles on which to identify further mitigation proposals, that will be considered through the 'monitor and manage' approach to mitigate projected traffic impacts resulting from new housing and other development over the Plan period.
- 5.87 The schemes that are recommended to be provided within the Local Plan period, via developer contributions arising from housing growth subject to the ongoing monitor and manage processes and funding are:

A27 junction improvements:	<ul style="list-style-type: none"> • Fishbourne Road roundabout and Terminus Road Link (A259) • Bognor Road Roundabout and Vinnetrow Road Link (A259)
Local Schemes	<ul style="list-style-type: none"> • Various local transport schemes identified within the WSCC Local Transport Plan

	<ul style="list-style-type: none"> • Other schemes forthcoming during the Local Transport Plan period
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5.88 This is a shift away from the previous approach of ‘predict and provide’ which forecasts the predicated growth in traffic and provides mitigation based on the forecast growth. The ‘monitor and manage’ approach is based on identifying a package of potential highway improvements (including enhanced walking, cycling and public transport) which will be implemented following a monitoring process that will define the actual demand on the network and the requirement for the schemes.

5.89 To oversee the delivery of the monitor and manage process a Traffic and Infrastructure Management Group (TIMG) will be set up, consisting of representatives from Chichester District Council, West Sussex County Council and National Highways.

5.90 The approach to securing financial contributions towards the A27 is as set out below:

Strategic development locations carried forward from 2015 Local Plan (without planning permission as at November 2022)

- West of Chichester SDL – Phase 2 = £1,803 per dwelling
- Tangmere SDL = £5,914 per dwelling

All other housing development = £7,728 per dwelling

The per dwelling contribution figure will rise in line with inflation to take account of increased construction costs and will be calculated to be current at the time of a grant of permission.

5.91 The approach to the A27 and local road network will be set out in a Statement of Common Ground which is being discussed with National Highways and West Sussex County Council.

5.92 The Transport Infrastructure policy sets out the strategic integrated transport measures to:

- mitigate the impact of development on the highway network through the monitor and manage approach,
- improve highway safety and air quality,
- promote more sustainable transport patterns,
- encourage the increased use of sustainable modes of travel, such as public transport, cycling and walking and,
- target investment based on the routes and projects identified in the West Sussex Local Transport Plan, the Local Cycling, Walking Infrastructure Plan (LCWIP) and the Infrastructure Development Plan (IDP)

5.93 The Transport and Development policy is a development management policy which sets out the requirements for new development to demonstrate how it will contribute to a safe, sustainable, connected and accessible transport network, through meeting

the criteria and through the submission of the relevant supporting information (e.g., Transport Assessment/ Statement and Travel Plans).

- 5.94 The Active Travel – Walking and Cycling policy requires that new development delivers, enables and contributes towards cycle and walking routes across the plan area, including those identified in the Chichester City Local Cycling and Walking Infrastructure Plan (LCWIP), the West Sussex Transport Plan 2022-2036, the West Sussex Walking and Cycling Strategy 2016-2026 and the Chichester Area Sustainable Transport Package. The policy criteria also requires that development enhances the pedestrian and cycling environment and provides cycle parking and storage facilities.
- 5.95 The Parking Provision policy requires adherence to the West Sussex Parking Standards Guidance (2020) or any subsequent standards adopted by the District Council or West Sussex County Council. The Chichester District Car Park Strategy also continues to play a role in managing growth in car use, and future updates to the Strategy will need to be considered as part of the Monitor and Manage approach.

Chapter 9: Infrastructure

- 5.96 The Infrastructure Delivery Plan (IDP) that accompanies the proposed submission Local Plan identifies programmed infrastructure provision from both the public and private sector in addition to that delivered through the development process. It provides an overview of the strategic cumulative infrastructure requirements and where known, who is responsible for delivery and a broad indication of phasing, costs and funding mechanisms at the local level. Capacity in infrastructure and services will be monitored through updates of the Infrastructure Delivery Plan and future infrastructure need assessments via the five-year rolling Infrastructure Business Plan (IBP). The IDP is produced in consultation with infrastructure providers, West Sussex, Hampshire and Surrey county councils and neighbouring planning authorities to ensure that the correct infrastructure provision is secured.
- 5.97 The provision of infrastructure is necessary to support development. It can range from strategic provision, such as the provision of a new road or school, to the creation of a local play-space, community facilities, a country park, or improvements to telecommunications for example. A key element of the Local Plan is for new development to be coordinated with the infrastructure it requires and to take into account the capacity of existing infrastructure. Infrastructure delivery will be secured through a combination of developer contributions (CIL and S106), public sources of funding and delivery by other organisations and bodies.
- 5.98 The type of infrastructure that the Infrastructure policy covers includes:
- Transport facilities (road, bus, rail, cycling and walking).
 - Education (further and higher, secondary, primary, early years, and special educational needs and disability).
 - Health (acute care and general hospitals, community and mental health facilities, and primary care facilities).
 - Social infrastructure (social and community facilities, and sports and leisure facilities).
 - Green infrastructure (open spaces and parks, natural environment, flood defences, rivers and streams).

- Public and community services (emergency services, libraries, cemeteries and crematoria, waste management and disposal).
- Utility Services (wastewater treatment and sewerage networks, water supply, electricity and gas distribution, and telecommunications/digital infrastructure).

5.99 The IDP sets out the site-specific infrastructure requirements as well as plan-wide projects. This has informed the viability testing of the Plan, including the strategic site allocations, which is necessary to make sure that the policies in the plan are realistic and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. The IDP is included as a background document to this report, see Appendix I.

Chapter 10: Strategic and Area Based Policies

5.100 Chapter 10 Strategic and Area Based Policies contains the detailed policies relating to strategic site allocations, strategic parish locations and other areas which warranted a specific policy to guide development proposals.

5.101 As set out in the housing chapter summary section of this report, the Local Plan is giving a strategic housing number to some Parishes. Each Parish with a strategic housing number has a separate policy with criteria that will be used by neighbourhood planning groups (or to inform a subsequent Site Allocation DPD) to allocate a site or sites to meet the number of dwellings in the policy. This includes Chichester city (270 dwellings), Chidham and Hambrook (300 dwellings) and Loxwood (220 dwellings). However, whilst the policies set out the 'headline' figure, where windfall sites have been granted permission within the same Parish since the base date of the plan (April 2021), these sites will count towards the overall figure to be found through allocations.

5.102 The Plan also carries forward the strategic site allocations from the 2015 Local Plan, including Land West of Chichester, Land at Shopwyke, Westhampnett/ North East Chichester and Land West of Tangmere. The policies have been carried forward largely unamended except for any necessary updates.

5.103 The Chichester City Development Principles policy includes criteria to ensure that new development in the city enhances its role as a sub-regional centre whilst conserving and enhancing the city's historic character and heritage.

5.104 Southern Gateway is recognised as having potential for regeneration, however, due to the lack of availability of some of parcels of land within the area, the Plan can only allocate the Bus Station, Bus Depot and Basin Road Car Park (110 dwellings) and the Police Field (Kingsham Road) (70 dwellings). The remainder of the regeneration area is covered by a criteria-based policy which sets out the principles that would need to be complied with for development coming forward in the wider southern gateway area.

5.105 The policies for the new strategic site allocations at Land East of Chichester, Highgrove Farm (Broadbridge) and Land at Maudlin Farm (Westhampnett) set out the requirements for each site in terms of number of dwellings and supporting community infrastructure where needed. The policies also all include a requirement for a number of custom and self build plots, in order to meet the need on the custom

and self-build register. As a result of the need for gypsy and traveller pitches, the policies also include a requirement for a small number of pitches to be included. The requirement for masterplanning to achieve a high-quality form of development is clearly set out in the policy, along with other site specific criteria to ensure that the impact on the built and natural environment is acceptable and that new development is well integrated with neighbouring areas and provides sustainable transport links.

- 5.106 The Local Plan includes a broad location for development (BLD) at Southbourne. This is akin to an area of search, with the exact location of the site to be defined either through a future neighbourhood plan or a Site Allocation DPD. The policy sets out the requirement for development to be comprehensively masterplanned as well as the supporting infrastructure and other requirements (including gypsy and traveller pitches, a site for travelling showpeople, custom and self-build plots).
- 5.107 The Local Plan also includes a policy for Thorney Island, to cover any proposals for new development and changes of use at the military base and airfield. Two policies are included for Goodwood Motor Circuit and Airfield to support its ongoing operation through appropriate development and prevent noise sensitive development from compromising its operation.
- 5.108 A strategic employment site is allocated at Land South of Bognor Road, to accommodate at least 28,000 sqm of employment space and 5 plots for travelling showpeople with 1 ha of ancillary storage requirement. Land East of Rolls Royce is safeguarded to support the continued expansion and long-term viability of Rolls Royce Motor Cars.

Appendices/Glossary

- 5.109 These contain further background and explain technical terms and acronyms where these are not explained in the main body of the text itself. The appendices also include a monitoring and implementation framework which indicates how the plan will be monitored and kept under review. Appendix C (of the Local Plan) provides further guidance in marketing requirements and additional information to support planning applications.

Policies Map

- 5.110 The Local Plan proposed submission version needs to be accompanied by a submission policies map when submitted to the Secretary of State in order to show how the adopted policies map would be amended by the accompanying local plan if it were adopted. As the council's current policies map is only available as an interactive map on the website, the proposed amendments to the policies map are shown in the maps at Appendix B and this forms the Submission Policies Map.

Supporting documents

- 5.111 There are also several supporting documents produced to inform the Local Plan process to ensure compliance with national policy and guidance as well as regulatory and legislative requirements, including a Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA).
- 5.112 Planning authorities are required to carry out a Strategic Environmental Assessment (SEA) in accordance with the requirements of European Directive (2001/42/EC). This was transposed into national law by the Planning and Compulsory Purchase Act 2004, which introduced a requirement to carry out Sustainability Appraisal for local plans in section 19(5)(a). Sustainability Appraisal fully incorporates the European SEA requirements but expands it to also take account of social and economic matters. The role of the SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 5.113 The Vision, Strategic Objectives, Strategic policies, detailed policies and site allocations/ locations for development have all been subject to Sustainability Appraisal which has informed the proposed submission Local Plan.
- 5.114 The SA presents an appraisal of reasonable growth scenarios for the northeast and south of the plan area which form the 'reasonable alternatives'. These have been developed through consideration of strategic factors, site options and parish/settlement scenarios. For the south of the plan area, seven reasonable growth scenarios were appraised, with the main variables being higher growth at Southbourne, Westhampnett and selected service villages. For the northeast of the plan area, three scenarios were appraised (each with and without Crouchlands) focussing on low, higher and highest growth levels at the main service villages in the area.
- 5.115 The Proposed Submission Local Plan supports 'Scenario 3' for the south which performs well, with few drawbacks relative to the reasonable alternatives. Higher growth at Southbourne, in place of an allocation at Maudlin Farm, Westhampnett, is identified as preferable in a number of respects in the appraisal matrix; however, it would give rise to concerns from a nutrient neutrality perspective. Also, there are deliverability risks with higher growth at Southbourne.
- 5.116 In the northeast, the Proposed Submission Local Plan take an approach which combines the low and higher growth scenarios and rules out options which include Crouchlands Farm. The appraisal generally finds that the lower growth scenarios are preferable as they score well, except in meeting housing need. The highest levels of growth would lead to challenges. The approach taken in the Local Plan balances the need for housing with the constraints of the area.
- 5.117 The SA appraisal of the Plan assesses the Plan in relation to the SA objectives and the conclusions reflect the difficult choices that the Plan has had to make in balancing the significant and extensive constraints of the plan area with the need to plan for an appropriate level of growth.
- 5.118 The Conservation of Habitats and Species Regulations 2017 implement the requirements of European Directive 92/43/EEC and place the Council under a duty to undertake an appropriate assessment of the plan if (a) is likely to have a significant

effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects) and (b) the plan is not directly connected with or necessary to the management of those sites (Regulation 105(1)).

- 5.119 The Habitats Regulation Assessment has not raised any significant issues with the Plan and the minor policy amendments suggested have been made to the Plan. This position reflects the significant amount of work undertaken to address both nutrient neutrality and water neutrality.

Evidence Base

- 5.120 The new Local Plan must be informed by a sound evidence base and the council has been preparing a series of technical documents on a wide range of topics to support the vision and objectives and understand what new development is needed and to guide decisions on how much new development can be accommodated in the Plan area and where it should be located, as well as the constraints to development, in particular in relation to water neutrality and the A27.
- 5.121 This includes technical documents prepared by specialist consultants on behalf of the Council.
- 5.122 The published evidence base documents are available to view on the Council's website [Supporting evidence - Local Plan review: Chichester District Council](#). Members are directed to carefully consider all of these documents alongside this report.

Duty to Cooperate

- 5.123 The proposed submission version of the Local Plan will be supported by a duty to cooperate 'Statement of Compliance'. The Statement of Compliance is an overarching document that demonstrates how the council has met the legal and soundness requirements of the duty to cooperate. It identifies the key strategic planning matters and how the council has worked with neighbouring authorities and other prescribed bodies through the plan-making process to ensure strategic planning matters have been satisfactorily addressed. The Statement of Compliance (Appendix F) will be published alongside the Regulation 19 Local Plan as a supporting document. The latest version of the Statement of Compliance can be viewed with the evidence documents. Although substantially complete, some further work on updating the Statement will be needed before it can be finalised i.e. reflecting the latest responses to the recent letter regarding unmet housing needs and the latest position on Statements of Common Ground.

Unmet housing need

- 5.124 In December 2021 all neighbouring authorities and those authorities whose area fell wholly or partly within the housing market areas covering the plan area, even if they were not immediately adjoining the plan area, were contacted to establish if they were able to accommodate any unmet housing need from the Chichester Local Plan area.
- 5.125 No authorities responded to confirm that they could take any unmet needs, although both Arun and East Hampshire District Councils indicated that they would be willing to explore this further. Meetings have been held with both authorities but neither authority are currently in a position to confirm that they can accommodate any of

Chichester's need. Preparation of Arun's Local Plan is currently paused and they do not yet know what their local housing need figure will be or whether they will be able to meet it. Whilst this represents the current position Arun will need to review their ability to meet some of Chichester's unmet need when they restart their local plan process. East Hampshire are currently undertaking an Issues and Priorities consultation, which includes a question on whether the unmet housing needs of neighbouring authorities should be accommodated by East Hampshire. However, the earlier discussions with East Hampshire indicated that the availability of potential sites were distant from the Chichester Local Plan Area, with no direct transport connections, and were therefore unlikely to be suitable for meeting housing needs associated with the Chichester Local Plan Area.

Statements of Common Ground

- 5.126 In order to set out an agreed position with other authorities or consultees, a number of Statements of Common Ground (SoCG) are being prepared. Appendix 2 of the Statement of Compliance sets out the matters to be included and the current position in respect of drafting the SoCG.
- 5.127 It is hoped to agree as many of the SoCG by the start of the Regulation 19 consultation, although this is partly dependant on the sign off process for the other party, and certainly by submission of the Local Plan. There may in any case be a need to update the SoCG following the Regulation 19 consultation, depending on the nature of any Regulation 19 representations from duty to cooperate bodies.
- 5.128 The issue of water neutrality is one that affects a number of local authorities and there will be a need to have a consistent approach in how this is addressed in SoCG. Officers at Crawley Borough Council are currently drafting a statement which may either form a standalone document or be appended to individual SoCG with relevant duty to cooperate bodies.
- 5.129 A joint SoCG between the authorities which make up the West Sussex and Greater Brighton Strategic Planning Board is also in the process of being prepared. A draft SoCG was circulated earlier this year for officer comment. However, despite chasing for details about a timeline for completion of the SoCG and formal signing off, this remains outstanding. Whilst this would have been a beneficial statement to have progressed, any risks of not having an agreed SoCG is reduced through the production of the bi-lateral SoCG with neighbouring authorities.

Next steps

- 5.130 The council must make a copy of the proposed submission plan and documents publicly available before they are submitted to the Secretary of State for examination. The requirement to do this is set out in Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. If Council approve the Plan for consultation, the representation period will start on the 3 February for six weeks, until the 17 March 2023, and following that, submission of the Plan for formal examination.
- 5.131 This consultation phase of the local plan process differs from Regulation 18 (the Preferred Approach) as the scope of the invited representations is limited to whether the Plan that has been produced is:

- a) legally compliant (i.e., whether it meets the legal requirements); and
- b) sound (i.e., whether it has been positively prepared, is justified, is effective and is consistent with national policy)

- 5.132 All representations received during the representation period will be sent to the planning inspectorate when the draft Local Plan is submitted together with other supporting documentation.
- 5.133 At the Regulation 19 stage, there is a requirement to produce and make available a 'statement of representations procedure' (set out in Regulation 35), this document sets out that the proposed documents are available for inspection and of the places and times at which they can be inspected. The content of representations at this stage is limited to legal compliance and soundness issues, which must be targeted towards a specific policy or paragraph in the draft Plan. There is a formal method of responding that is required by the Planning Inspectorate which will be reflected in the online form (and a paper version of the form). The form will allow people to refer to a policy, policies map reference, diagram, paragraph or supporting document (e.g., the Sustainable Appraisal/ and or Habitats Regulation Assessment) and then to explain why they think it is or is not legally compliant or/and sound. It will also include a question asking people to set out the modification that they consider necessary to make the draft Local Plan legally compliant and/or sound including any revised wording. Respondents will have the ability to attach supporting documents to their justification if relevant.
- 5.134 The form will also ask the respondent whether they wish to participate at the oral examination if they are seeking a modification and to explain why. It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.
- 5.135 The response form will also ask whether the respondent wishes to be kept informed of the submission, publication and adoption stage of the local plan process. A guidance note will be made available so that people understand how they can respond.
- 5.136 We will encourage the use of electronic documents and ask people to submit their representations electronically. If people cannot get access to a computer, then we will help them find an alternative. The form will make it clear that we cannot accept anonymous representations and that personal data will be processed in line with the Privacy Notice.
- 5.137 An important difference between this stage and earlier stages is that representations will be sent to the Planning Inspectorate together with the draft Local Plan and supporting documentation.
- 5.138 Carrying out the six-week consultation in accordance with the method set out in the Statement at Appendix E as well as sending the Statement to 'general and specific consultation bodies' who were invited to make representations under Regulation 18 (e.g., consultees) will ensure that the statutory requirements are met. The consultation will be carried out in accordance with the Statement of Community Involvement (SCI) (2018)

6. Alternatives Considered

- 6.1 Alternative strategies to meet different levels of development need are explored in the Sustainability Appraisal accompanying the Local Plan.
- 6.2 The preparation of the Local Plan itself has to follow the requirements as set out in legislation, as discussed below. This requires that plans are consulted upon, as proposed in this report.
- 6.3 A delay in agreeing to publish the Local Plan 2021 – 2039 Proposed Submission will mean that the decisions in the Plan area will continue without an up-to-date plan with the presumption in favour of sustainable development engaged, due the current housing land supply position.

7. Resource and Legal Implications

- 7.1 The proposal does not have any additional resourcing implications for the Council over and above the budgets already agreed for this work.
- 7.2 The preparation of the Local Plan 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 (as amended) are of particular relevance. This consultation would conform with Regulation 19 of these regulations. Failure to comply with these regulations is likely to result in the Local Plan Review being found to be not 'legally compliant' at its examination.

8. Consultation

- 8.1 The Local Plan 2021- 2039: Proposed Submission was prepared taking account of the matters raised in the Issues and Options consultation undertaken in 2017 and the Preferred Approach consultation in 2018, the input of officers in other relevant sections within the Council and the regular meetings of the Council's Development Plan and Infrastructure Panel.
- 8.2 The Local Plan 2021- 2039: Proposed Submission sets out the Council's proposed strategies and policies that it considers to be an evidence led approach to provide an appropriate level of housing given the constraint of the A27 and that it will provide an effective basis for considering future development proposals. It has been prepared in accordance with the NPPF, previous consultation responses and the current evidence base available.

9. Community Impact and Corporate Risks

- 9.1 The Local Plan is likely to have a range of significant implications for many communities in the plan area as the plan seeks to address a range of issues including climate change, natural environment, housing, employment and economy, health and wellbeing, design and heritage and strategic infrastructure.

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.

- 9.2 The council is committed to working with parish councils to support neighbouring planning in parishes either reviewing or preparing new neighbourhood plans that may include bringing forward new development. The proposed submission Local Plan provides a strategic framework for development to enable this.
- 9.3 The reliance in the Local Plan on development allocations being brought forward by way of neighbourhood plans does, however, present some risk to the council in terms of being able to demonstrate that the plan's housing policies are deliverable. Work on neighbourhood plans can proceed in parallel with the Local Plan now that the proposed housing numbers in the proposed submission version of the Local Plan are known, so that those plans can themselves move forward quickly to examination upon receipt of the Local Plan Inspector's report.
- 9.4 Should insufficient progress be made in identifying land through the neighbourhood planning process then the council will need to consider allocating the land through the subsequent Site Allocation DPD to ensure that the development strategy proposed by the Plan is deliverable.

10. Other Implications

	Yes	No
Crime and Disorder The Local Plan includes design principles (Policy P1) which require new development to make a positive contribution to creating a safe and secure environment by integrating measures for security and designing out the fear of crime and opportunities for crime. The IDP also includes infrastructure to support policing.	✓	
Climate Change and Biodiversity Climate change and biodiversity is addressed specifically in Chapter 4 of the Plan but will also be addressed through the delivery of development.	✓	
Human Rights and Equality Impact The impact of the Proposed Submission Local Plan on human rights and equality is considered in the Equalities Impact Assessment (Appendix G)	✓	
Safeguarding and Early Help		✓
General Data Protection Regulations (GDPR)		✓
Health and Wellbeing The impact of the Proposed Submission Local Plan on health and wellbeing is considered in the Health Impact Assessment (Appendix H)	✓	

11. Appendices

Appendix A: Chichester Local Plan 2021 – 2039: Proposed Submission (January 2023)

Appendix B: Submission Policies Map (schedule and maps showing how the policies map would be amended by the Local Plan) (January 2023)
Appendix C: Chichester Local Plan Sustainability Appraisal and Non-Technical Summary (January 2023) – to follow
Appendix D: Chichester Local Plan Habitats Regulations Assessment (January 2023) – to follow
Appendix E: Statement of Representation Procedure
Appendix F: Chichester Local Plan Duty to Cooperate Statement of Compliance (January 2023)
Appendix G: Chichester Local Plan Equalities Impact Assessment (January 2023)
Appendix H: Chichester Local Plan Health Impact Assessment (January 2023)
Appendix I: Chichester Local Plan Infrastructure Delivery Plan (IDP) (January 2023)

12. Background Papers

[Issues and Options - consultation June 2017: Chichester District Council](#)

[Preferred approach - consultation December 2018: Chichester District Council](#)

[Statement of community involvement: Chichester District Council](#)

Chichester Local Plan Review: Preferred Approach – Consultation: Report to Cabinet 14 November 2018 and Council 20 November 2018

Local Plan Review Way Forward: Report to Cabinet and Council in December 2019

Summary of the consultation responses received for the ‘Part 2’ Development Management policies - Report to Cabinet and Council in March 2021

The Local Development Scheme was updated in March 2021 and the report to Cabinet and Council (Cabinet 2 March 2021)

Local Plan and Strategic Infrastructure Update Report considered at an ‘All Member’ Council Session on 29 July 2021

All Member workshop January 2022