

# Sustainability Appraisal (SA) of the Chichester Local Plan

SA Report  
Non-technical Summary

January 2023

## Quality information

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# Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Chichester Local Plan. Once adopted, the Local Plan will establish a strategy for growth and change up to 2039, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.

It is important to note that the plan area covers that part of Chichester district outside of the South Downs National Park (SDNP), and the local plan area is broadly divided into two sub-areas: the northeast plan area (north of the SDNP); and the southern plan area (south of the SDNP).

SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.

Central to the SA process is preparation of an SA Report for publication alongside the draft plan, with a view to informing the consultation and subsequent plan finalisation.

This report is the Non-Technical Summary (NTS) of the SA Report.

## Structure of the SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point**?

- including in relation to 'reasonable alternatives'.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What's the scope of the SA?*

## What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list indicates the parameters of SA, providing a methodological 'framework' for assessment.

The topics at the core of the SA framework are as follows:

- Accessibility
- Air / environmental quality
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Communities
- Economy and employment
- Historic environment
- Homes
- Land, soils and resources
- Landscape
- Transport
- Water

## Plan-making / SA up to this point

A key element of the required SA process involves assessing ‘reasonable alternatives’ in time to inform the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

As such, Part 1 of the main report explains work undertaken to develop and appraise a ‘reasonable’ range of alternative approaches to the allocation of land for development, or ‘**growth scenarios**’.

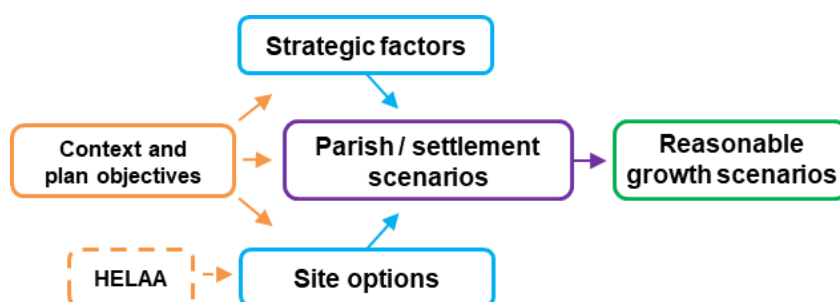
Specifically, Part 1 of the report –

- 1) Explains the process of **defining** the growth scenarios
- 2) Presents the outcomes of **appraising** the growth scenarios
- 3) Explains reasons for **selecting** the preferred scenario, in light of the appraisal.

### Defining growth scenarios

Section 5 of the report explains a *process* that led to the definition of growth scenarios.

Figure A: Defining growth scenarios



Section 5.2 of the report gives consideration to the ‘top down’ / strategic factors, with sub-sections for: A) development quantum; and B) broad distribution.

- **Development quantum** – local housing need (LHN) is 638 dwellings per annum (dpa). However, there are clear reasons to suggest that it is reasonable to explore growth scenarios that would involve setting the housing requirement at a figure below LHN (and thus export unmet housing need). Key reasons are:
  - The southern plan area (which comprises Chichester, the wider ‘east-west corridor’ and the Manhood Peninsula) is highly constrained by capacity on the A27. Detailed discussions with National Highways and West Sussex County Council, over the course of 2019-2022, have led to a resolution that there is capacity for no more than 535 dpa in this area.
  - There are wide-ranging planning reasons to suggest that the northeast plan area is not suited to providing for the resulting shortfall (638 – 535 = 103 dpa, or 1,854 in total), including relating to the rurality of the area and the fact that the entire area falls within a constrained water resource zone.
  - Whilst discussions with neighbourhood local authorities, under the Duty to Cooperate, have not served to identify any clear options for providing for unmet needs from Chichester (at reasonably suitable locations), there is the *potential* for unmet needs across the sub-region to be addressed through a forthcoming Local Strategy Statement (LSS) prepared by the Coastal West Sussex and Greater Brighton Planning Board (this will be version 3, with version 2 having been published in 2016).
- **Broad distribution** – the main report presents a lengthy review under a series of thematic headings, beginning with a discussion of three crucially important issues – A27 capacity (southern plan area), nutrient neutrality (southern plan area) and water neutrality (northeast plan area) – before going on to discuss other key issues with a bearing on how growth should be broadly distributed between and within the two plan areas, and also different ‘growth typologies’ that might be supported, e.g. local plan allocations (which might be strategic or more modest in scale) versus ‘parish allocations’ (i.e. the approach of assigning a housing target to a parish council, with formal allocations then made through a subsequent neighbourhood plan). In summary, the review aims to:

- Expand on reasons why there is a 535 dpa supply ‘cap’ for the southern plan area (also arguments for considering lower growth scenarios, and arguments against identifying a supply buffer).<sup>1</sup>
- Present arguments against a high growth strategy for the northeast plan area (which would be necessary to enable the local plan housing requirement to be set at LHN), including water neutrality.
- Identify headline factors with a bearing on distribution and site selection within both sub plan areas, including:
  - The settlement hierarchy and, more generally, a need to direct growth to the most accessible and best-connected locations, including villages with good public and active transport options.
  - A27 junction capacity issues / upgrade potential, which serves as an argument against a focus of growth on the Manhood Peninsula, and potentially weighting growth to the west of Chichester.
  - Nutrient neutrality, which is a major constraint to the west of Chichester (albeit somewhat a matter of timing / phasing, i.e. to allow for wastewater treatment upgrades) and a viability consideration.
  - Flood risk, which is a key constraint at the two settlement hubs on the Manhood Peninsula.
  - Landscape capacity and two emerging designations (strategic wildlife corridors and landscape gaps; although it is important to be clear that the local plan is not aiming to designate landscape gaps, but instead this will be left to the Site Allocations Plan and/or neighbourhood plans).

Section 5.3 of the report then gives ‘bottom up’ consideration to the pool of **site options** available and hence in contention for allocation. The starting point is a list of 193 sites identified by the Council’s Housing and Economic Land Availability Assessment (HELAA, 2021) as both ‘uncommitted’ and ‘developable’.

Section 5.4 of the report then draws upon the preceding two stages of work to consider growth scenarios for all of the parishes intersecting the plan area. Parishes intersecting the southern plan area are considered first, followed by parishes intersecting the northeast plan area.

For the **southern plan area**, the conclusion is that:

- For nine parishes (N.B. the focus is only on those parishes that include a settlement hub or service village) there is judged to be only one reasonable growth scenario. Equally, there is only one reasonable growth scenario involving an expansion of Chichester City into a surrounding parish.
- For five parishes there are two reasonable growth scenarios, namely Southbourne, Chidham and Hambrook, Westhampnett, Hunston and North Mundham (two parishes that warrant being considered together, as the service villages are very closely linked) and Birdham.

For the **northeast plan area**, the conclusion is that there are three reasonable growth scenarios for each of the four parishes if the option of a new settlement at Crouchlands Farm is to be ruled out as unreasonable. There is a strong argument to suggest that this new settlement option is unreasonable; however, on balance, it is considered reasonable and appropriate to take the option forward for further consideration. The implication is that there is a fourth scenario for Plaistow and Ifold Parish.

Section 5.5 of the report then considers how to combine the parish / settlement scenarios in order to form reasonable growth scenarios for the plan-area as a whole. At this stage, it became apparent that it would be more appropriate to define two sets of reasonable growth scenarios: one for the southern plan area; and one for the northeast plan area. This led to the two sets of reasonable alternative growth scenarios shown below.

By way of further introduction:

- ‘Completions’ are new homes that have been delivered since the start of the plan period (2021); ‘commitments’ are new homes with a planning permission or an existing allocation that can be carried forward; windfall sites are non-allocated sites that come forward in line with policy, typically in urban areas.
- It is important to be clear that the ‘new supply’ is homes over-and-above completions and commitments.
- The distinction between local plan vs. parish allocations is explained by asterisks (\*).
- ‘New supply’ figures are rounded to the nearest 50.

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<sup>1</sup> A ‘supply buffer’ is the difference between the total identified ‘supply’ and the number of homes that needs to be delivered. There can always be unforeseen issues with delivering the identified supply in practice (e.g. issues that arise at the development management / planning application stage), hence there is an argument for a ‘supply buffer’ to ensure that the number of homes that needs to be delivered is delivered. However, for the Chichester southern plan area, there is a clear argument against identifying a supply buffer, because a key objective is ensuring that the 535 dpa ‘cap’ is not breached in practice.

Table A: The RA growth scenarios for the south (constants greyed-out; higher parish scenarios in red)

Supply component		Scenario	1	2	3	4	5	6	7	
Completions			658	658	658	658	658	658	658	
Commitments (Dec 2022)			5476	5476	5476	5476	5476	5476	5476	
Windfall			595	595	595	595	595	595	595	
New supply	Chichester	Parish****	450	450	450	450	450	450	450	
		Extension into Oving Parish*	700	700	700	700	700	700	700	
	Settlement hubs	Southbourne*	1050	1050	1050	1050	1500	1500	1500	
		Selsey	0	0	0	0	0	0	0	
		Tangmere	0	0	0	0	0	0	0	
		East Wittering & Bracklesham	0	0	0	0	0	0	0	
	Service villages	East	Westhampnett*	0	0	250	250	0	0	250
			Boxgrove**	50	50	50	50	50	50	50
		West	Fishbourne**	50	50	50	50	50	50	50
			Bosham (Broadbridge)*	250	250	250	250	250	250	250
			Chidham and Hambrook**	150	250	150	250	150	250	150
			Westbourne**	50	50	50	50	50	50	50
		South	Hunston and North Mundham**	0	50	0	50	0	50	0
			Birdham**	0	50	0	50	0	50	0
Total			9,479	9,679	9,729	9,929	9,929	10,129	10,179	
Per annum			527	538	541	552	552	563	566	
% under/over 535*****			-2%	1%	1%	3%	3%	5%	6%	

\* local plan allocation

\*\* parish allocation

\*\*\* broad location for development<sup>2</sup>

\*\*\*\* both a local plan allocation and a parish allocation<sup>3</sup>

\*\*\*\*\* the amber shading aims to highlight a more significant departure from the 535 dpa target figure / 'cap'.

<sup>2</sup> Southbourne is a broad location for development (see NPPF paragraph 68) with an allocation to be made either through a subsequent neighbourhood plan prepared by the parish council or a site allocations plan prepared by CDC.

<sup>3</sup> Southern Gateway is an allocation for 180 homes, plus there is a parish allocation of 270 homes.

**Table B: The RA growth scenarios for the northeast plan area**

Supply component		Scenario	1	1a	2	2a	3
Completions			54		54		54
Commitments (December 2022)			198		198		198
Windfall			62		62		62
New supply*	Kirdford		50		150		300
	Loxwood		75		450		1,050
	Plaistow and Ifold		25		150		175
	Wisborough Green		50		75		125
	Crouchlands Farm new settlement		0	600	0	600	0
<b>Total homes</b>			<b>514</b>	<b>1,114</b>	<b>1,139</b>	<b>1,514</b>	<b>1,964</b>
<b>Per annum</b>			<b>29</b>	<b>62</b>	<b>63</b>	<b>84</b>	<b>109</b>

\* With regards to the distinction between local plan vs. parish allocations, the assumption is that there would be reliance on parish allocations, other than in respect of Crouchlands Farm and highest growth at Loxwood.

## Appraising growth scenarios

Section 6 of the report presents an appraisal of the two sets of RA growth scenarios, and summary appraisal findings are presented below, in the form of two appraisal matrices.

Within each of the appraisal matrices, within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to:

- rank the scenarios by performance, where one (highlighted by a gold star) is best performing; and then
- categorise the performance of each scenario in terms of 'significant effects', using **red** (significant negative effect), **amber** (moderate or uncertain negative effect), **no colour** (no significant effect), **light green** (moderate or uncertain positive effect) and **dark green** (significant positive effect).

## Southern plan area

In summary, the growth scenarios are as follows:

- Scenario 1 – Supply from completions, commitments, windfall and constant allocations only
- Scenario 2 – Scenario 1 plus higher growth at select service villages (SVs)
- Scenario 3 – Scenario 1 plus higher growth at Westhampnett
- Scenario 4 – Scenario 1 plus higher growth at select SVs and Westhampnett
- Scenario 5 – Scenario 1 plus higher growth at Southbourne
- Scenario 6 – Scenario 1 plus higher growth at Southbourne and select SVs
- Scenario 7 – Scenario 1 plus higher growth at Southbourne and Westhampnett

Table C: Appraisal of the southern plan area reasonable growth scenarios

Completions, commitments, windfall + constant allocations + growth / higher growth at...	Scenario 1 -	Scenario 2 SVs	Scenario 3 W'nett	Scenario 4 SVs W'nett	Scenario 5 S'bourne	Scenario 6 S'bourne SVs	Scenario 7 S'bourne W'nett
SA topic	Rank of preference and categorisation of effects						
Accessibility	2	3	2	3	★1	3	★1
Air / env quality	4	2	★1	2	★1	4	3
Biodiversity	2	3	★1	3	3	4	3
CC adaptation	=	=	=	=	=	=	=
CC mitigation	3	2	2	2	★1	★1	★1
Communities and health	2	2	2	3	★1	2	2
Economy, employment	=	=	=	=	=	=	=
Historic env	2	★1	2	2	★1	★1	2
Housing	5	4	3	2	2	★1	★1
Land, soils, resources	★1	2	3	4	5	6	7
Landscape	2	2	★1	2	★1	3	★1
Transport	2	3	★1	5	2	5	4
Water	2	2	★1	2	4	5	4

A detailed commentary is presented in the main report, but key summary points are:

- Scenarios 3 and 5 are shown to perform well under a relatively high number of topic headings, and to perform poorly under relatively few topic headings. This is an indication that these scenarios perform well overall, however, this conclusion cannot be taken from the appraisal with any certainty. This is because the appraisal is undertaken without any assumptions made regarding the degree of importance, or 'weight', that should be assigned to each topic heading in the decision-making process. In short, the appraisal does not aim to reach an overall conclusion on each scenario.
- Scenario 1 (low growth) is shown to perform relatively poorly under most topic headings. This reflects an assumption that low growth in the southern plan area would lead to increased pressure on the northeast plan area and/or unmet housing need that would then need to be met elsewhere within a constrained sub-region. The locations where unmet need would be met are not known, but that in and of itself serves as a reason for proactively planning to meet Chichester District's housing needs in full through the local plan, as far as possible.

N.B. 'Land' is an exception, reflecting an understanding that the Chichester southern plan area is associated with an extensive resource of Grade 1 quality agricultural land.

- All of the scenarios are associated with pros and cons. It is for the Council, as decision-maker (not SA), to weigh-up the pros and cons in order to reach a conclusion on which best represents sustainable development on balance.



### Northeast plan area

In summary, the growth scenarios involve supply from completions, commitments, windfall plus...

- Scenario 1 – **Lower** growth scenario across all parishes
  - Scenario 1a – plus Crouchlands Farm New Settlement
- Scenario 2 – **Higher** growth scenario across all parishes
  - Scenario 2a – plus Crouchlands Farm New Settlement
- Scenario 3 – **Highest** growth scenario across all parishes

Table D: Appraisal of the northeast plan area reasonable growth scenarios

	Scenario 1 Low	Scenario 1a Low Crouchlands	Scenario 2 Higher	Scenario 2a Higher Crouchlands	Scenario 3 Highest
SA topic	Rank of preference and categorisation of effects				
Accessibility	2	★1	4	3	5
Air / env quality	=	=	=	=	=
Biodiversity	?	?	?	?	?
CC adaptation	=	=	=	=	=
CC mitigation	?	?	?	?	?
Communities and health	2	★1	4	3	5
Economy, employment	=	=	=	=	=
Historic env	2	★1	4	3	5
Housing	6	5	4	3	2
Land, soils, resources	=	=	=	=	=
Landscape	2	★1	4	3	5
Transport	★1	2	3	4	5
Water	★1	2	3	4	5

A detailed commentary is presented in the main report, but key summary points are:

- Lower growth – is judged preferable to higher growth under six topic headings, whilst higher growth is judged preferable to lower growth only in respect of 'housing'. However, it does not necessarily follow that the appraisal finds lower growth to be preferable, or 'most sustainable', overall (see discussion above).

- Unmet needs – is a key consideration, but it is difficult to draw conclusions on sustainability implications, other than in terms of ‘housing’, as it is not known where unmet needs would be met.
- Crouchlands Farm new settlement – is shown to perform well under several headings, primarily because: the location is relatively unconstrained in several environmental respects; and the proposal includes delivery of a primary school. However, there are significant drawbacks to the scheme.
- Uncertain effects – is the conclusion under two headings. In both cases there are important issues/impacts to consider, but it is not possible to reach a conclusion on an order of preference with any certainty, including once account is taken of the fact that lower growth would lead to unmet needs.
- No differential effects – is the conclusion under four headings. These topic headings are considered less central to the appraisal, but that is not to say that there are not a range of issues to consider.

## Selecting the preferred growth scenarios

### Southern plan area

The following statement gives officers’ reasons for supporting **Scenario 3** (completions, commitments, windfall and constant allocations plus an allocation at Westhampnett) in light of the appraisal.

“The appraisal shows Scenario 3 to perform well, with few drawbacks relative to the reasonable alternatives. Higher growth at Southbourne, in place of an allocation at Maudlin Farm, Westhampnett, may be identified as preferable in a number of respects; however, there are significant concerns with regard to deliverability of a higher quantum of housing. Due to the need for infrastructure upgrades to the wastewater treatment works at Thornham, development is unlikely to be deliverable in this area in the first five years of the plan period and further development here will lead to a greater proportion of the overall development proposed by the plan being delivered later in the plan period. Given the resultant late delivery of development, it is therefore unlikely that a greater number of dwellings that 1,050 will be deliverable within the lifetime of the plan. It should also be noted that there are minor variances in councils preferred distribution of development, most notably parish allocations of 30 dwellings at Fishbourne and Westbourne, instead of 50 (as assumed above).”

### Northeast plan area

The following statement explains CDC officers’ reasons for supporting a blend between **Scenarios 1 and 2** (with an adjustment for Loxwood) in light of the appraisal. Specifically, there is support for: Lower growth at Kirdford and Plaistow and Ifold; and Higher growth at Loxwood (adjusted) and Wisborough Green.

“Meeting housing needs locally is a priority issue. However, the appraisal serves to highlight a wide range of drawbacks to supporting the highest levels of growth, including a number that are highly significant.

These drawbacks relate both to the unsuitability of the northeast plan area as a whole, as a location for significant growth, including around unsustainable travel patterns and risks to achieving water neutrality (at least under the highest growth scenario; this is also an issue for the timing of growth); and settlement and site-specific considerations, including at Kirdford, Wisborough Green and Crouchlands Farm. At all of these locations it is difficult to envisage the potential to justify the impacts that would result from significant growth, given assumed growth locations / sites, and knowledge of scheme proposals.

As the higher and highest growth scenarios at Loxwood may involve an expansion to the west of Loxwood, it has been necessary to consider this in more detail, notwithstanding that it would be for the neighbourhood plan to consider any site allocations. With regards to strategic expansion to the west of Loxwood, there are fewer constraints to growth here than is the case for the other villages. However, there is insufficient confidence regarding deliverability of the full (~1,000 home) scheme. Turning to the 400 home scheme assumed by the appraisal under a higher growth scenario, it is notable that latest information from the site promoters is that the site capacity is 325 homes. Furthermore, it is considered more reasonable for the neighbourhood plan to consider the potential for any allocation of this site to potentially include a first phase for around 150 homes, rather than supporting delivery of the site in its entirety in the plan period. This would address concerns regarding deliverability (market saturation) and will encourage a masterplanned approach for the site as a whole (which does form an obvious parcel, with clear boundaries). Finally, the capacity of smaller sites around the village is 70, which brings the total preferred parish allocation for Loxwood to 220 homes.

Having regard to the above, the preferred scenario provides a blend between Scenario 1 and Scenario 2 (as introduced above), with a downward adjustment for Loxwood (from the higher scenario).”

# Appraisal of the Local Plan

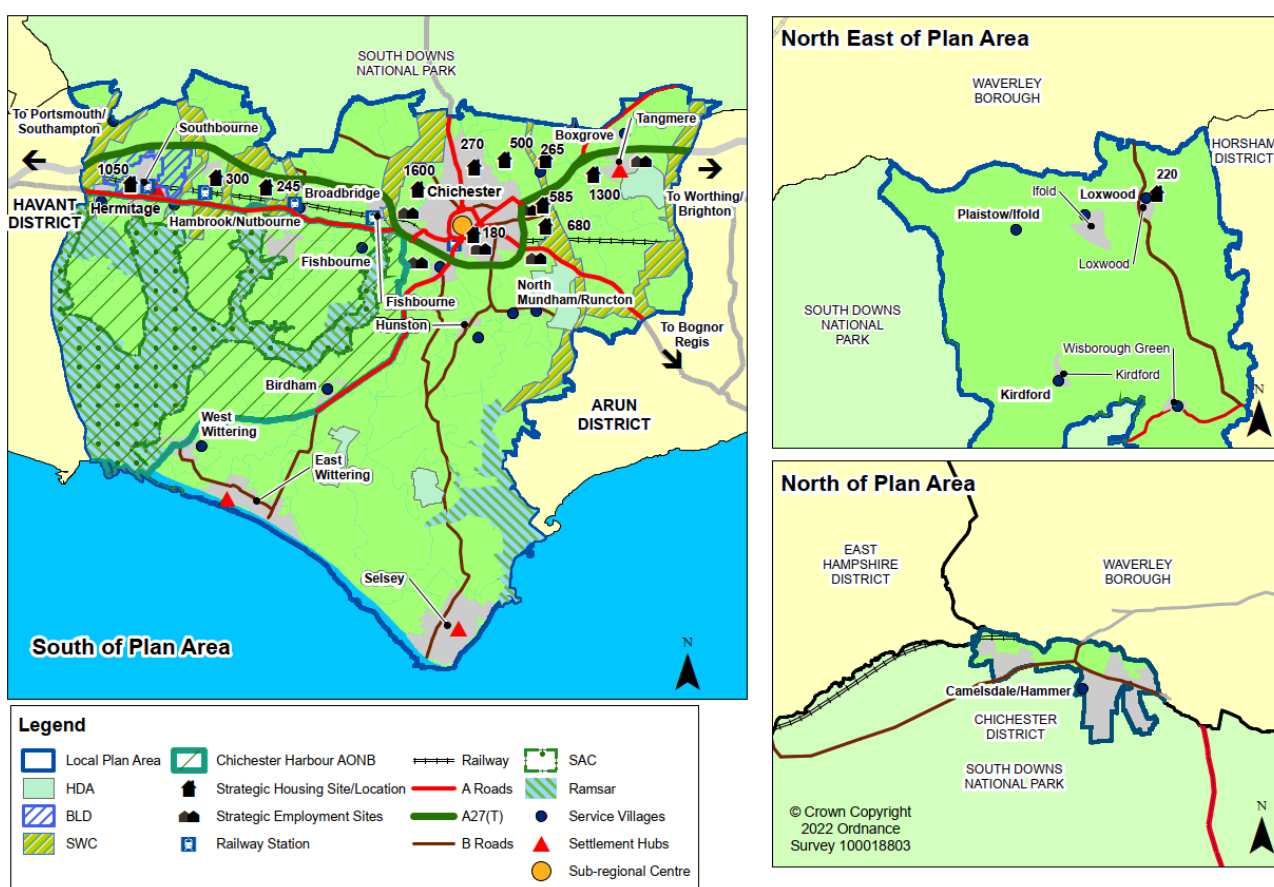
Part 2 of the SA Report answers the question “what are appraisal findings at this stage” by presenting an appraisal of the current ‘proposed submission’ version of the local plan as a whole. The appraisal takes the form of 13 narrative discussions – one for each of the topics that together comprise the SA framework.

In practice, the appraisal builds upon the appraisal of preferred growth scenarios presented / discussed above, with additional consideration given to: supply components that are a ‘constant’ across the growth scenarios; and thematic policies (both plan area wide and site-specific ).

The appraisal focuses on the spatial strategy and, in particular, the package of new proposed supply components (allocations, parish allocations and a broad location for development) that are proposed in order to meet development needs (as far as possible) and wider plan objectives.

The spatial strategy is reflected in a key diagram, which is reproduced below.

Figure B: The key diagram



The appraisal predicts mixed effects (as is typically the case with local plans). In summary:

- Positive effects are predicted under four topic headings, and in three cases it is possible to conclude that positive effects will be ‘significant’.
- Negative effects are predicted under three topic headings, and in two cases it is possible to conclude that negative effects will be ‘significant’.
- Neutral effects are predicted under the remaining topic headings. In all cases there are a range of important issues and impacts to consider, but it is not possible to reach a clear conclusion in respect of overall effects, either positive or negative.

The following bullet points summarise the key predicted positive and negative effects:

- **Significant positive effects**
  - Economy and employment – objectively assessed needs for employment land are met in full.
  - Transport – addressing A27 capacity issues, and transport-related constraints to growth in the rural northeast plan area, are both key factors that have influenced the plan-making process.
  - Water – addressing both the nutrient neutrality constraint in the southern plan area, and the water neutrality constraint in the northeast plan area, has also been a primary focus of plan-making.
- **Moderate or uncertain positive effects**
  - Communities – the plan seeks to partly delegate the task of allocating sites for development to neighbourhood plans, which is supported. Also, the proposal is to direct a good proportion of growth to locations where there the effect will be to support new and/or upgraded community infrastructure, potentially supporting ‘planning gain’ to the benefit of existing communities.
- **Moderate or uncertain negative effects**
  - Climate change mitigation – the plan will have a positive effect on the baseline (which is a scenario whereby housing growth continues to come forward, but in a relatively unplanned way), but it is not clear that the positive effect is of a magnitude reflective of the level of ambition that is required, given the urgency of climate change mitigation / decarbonisation / achieving net zero.
- **Significant negative effects**
  - Homes – the plan housing requirement is set at a level below local housing needs (LHN), such that the effect of the plan will be to generate unmet housing needs, and it is difficult to suggest where and when unmet needs will be met, given existing issues of unmet housing needs across the sub-region. However, it is recognised that this is a decision reached on balance, weighing-up competing objectives.
  - Land and soils – proposed locations for growth will lead to significant loss of best and most versatile (BMV) agricultural land, and this is likely to include land that is Grade 1 quality. In turn, it is appropriate to ‘flag’ a significant negative effect. However, it is recognised that there would likely be a similar rate of BMV agricultural land loss under the baseline (no plan) scenario.

## Next steps

### Submission, examination and adoption

Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed ‘sound’. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.

At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications, then these will be prepared and published for consultation (alongside SA if necessary).

Once found to be ‘sound’ the Local Plan can be adopted by the Council. At that time an ‘SA Adoption Statement’ must be published that sets out certain information including on monitoring indicators.

### Monitoring

The SA Report must present “measures envisaged concerning monitoring”, and there is an increased focus on monitoring nationally, in light of the proposal to reform plan-making to ensuring a clearer focus on achieving clear ‘outcomes’. As such, Section 11 of the report makes a number of suggestions, in respect of what might be the focus of monitoring efforts. However, it is recognised that it is for the Council to make a decision on an appropriate monitoring framework in light of practical considerations around available resources. The current approach to monitoring is set out at: [www.chichester.gov.uk/localplanmonitoring](http://www.chichester.gov.uk/localplanmonitoring).

Suggestions include: agricultural land (there is a need for a clearer evidence-base); biodiversity (the new net gain regime presents an opportunity for innovation); decarbonisation (the proportion of homes that achieve standards that go beyond the requirements set out in Building Regulations); employment land requirements (and commuting patterns), transport (innovative approaches to monitoring travel patterns) and water (this is a very technical area, but one that is of great interest to local communities and highly relevant to local plan-making, and so efforts must be made to communicate the issues / opportunities as clearly as possible).