

Sustainability Appraisal (SA of the Chichester Local Plan

SA Report Addendum

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Quality information

Prepared by

Checked by

Approved by

Mark Fessey
Associate Director

Prepared for:

Chichester District Council

Prepared by:

AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com

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Non-technical summary

This report presents an appraisal of the proposed Main Modifications (MMs) to the Chichester Local Plan (as submitted in May 2024) that are currently published for consultation.

The focus of the report is on: A) introducing the proposed MMs (Section 2); and then B) presenting an appraisal (Section 4). Also, consideration is given to the possibility of defining / appraising reasonable alternatives (Section 3), but the conclusion reached is that there are no reasonable alternatives at the current time.

It is important to be clear that this is an “addendum” report and does not aim to supersede the SA Report (2024). However, Appendix I of this report does present some targeted information aimed at supplementing the SA Report.

The appraisal presented in Section 4 concludes as follows:

The key consideration is the proposal to increase the housing requirement without identifying specific new supply (at this stage; i.e. specific new supply will be identified through a subsequent Site Allocations DPD or a new Local Plan) and in the context of an adjusted approach to A27 mitigation. A secondary issue is then the proposal to delete text quantifying the extent to which the spatial strategy is focused on the southern plan area. These proposed changes are supported from a perspective of supporting ‘homes’ objectives but give rise to a modest degree of tension in wider respects, most notably in terms of ‘transport’ objectives. This serves to highlight the importance of ongoing monitoring and work to monitor and manage transport impacts.

1 Introduction

- 1.1.1 AECOM is leading on the Sustainability Appraisal (SA) process that is being undertaken alongside preparation of the Chichester Local Plan 2021-2039 (“the Local Plan”).
- 1.1.2 The formally required SA Report was published alongside the final draft (‘proposed submission’) version of the Local Plan in 2023 under Regulation 19 of the Local Planning Regulations.
- 1.1.3 The aim of the SA Report, in accordance with Regulations, was essentially to present an appraisal of “the plan and reasonable alternatives” and “an outline of the reasons for selecting the alternatives”.
- 1.1.4 The Local Plan was then submitted to the Government for Examination in Public in May 2024 alongside the SA Report and all representations received at the preceding Regulation 19 publication stage.
- 1.1.5 The appointed Planning Inspectors then oversaw Examination Hearings, followed by publication of a Post Hearings Letter on 15th January 2025, which set out the following in respect of next steps:

“On the evidence we have read and heard to date, all of the main modifications set out in this letter are necessary for the Plan to be sound. We should be grateful if the Council would prepare a final set of main modifications for our review prior to consultation on them. The main modifications should be subject to Sustainability Appraisal and/or Habitats Regulations Appraisal as appropriate.”

- 1.1.6 The aim of this report is essentially to present an appraisal of the proposed main modifications (MMs) and reasonable alternatives (just as the fundamental requirement of the SA Report was to present an appraisal of the draft plan and reasonable alternatives, as discussed above).
- 1.1.7 The aim is to inform the current consultation which – it is important to be clear – is focused only on MMs. In turn, this report is an ‘Addendum’ to the SA Report (2022).
- 1.1.8 This report is structured as follows:
 - **Section 2** – presents a summary of the proposed main modifications.
 - **Section 3** – considers the question of reasonable alternatives.
 - **Section 4** – presents an appraisal of the proposed main modifications.

Supplementing the SA Report

- 1.1.9 As discussed, this is an addendum report with a specific purpose and does not aim to re-present information from the SA Report (2023) that is of little or no relevance to the current consultation on MMs.
- 1.1.10 However, **Appendix 1** does present information to supplement Section 5 of the SA Report in order to reflect the following advice provided by the Inspectors in their Post Hearings Letter to the Council:

“... we advise that the sustainability appraisal is organised and presented in such a way that it may readily be ascertained, without any paper chase being required, what strategic and other policy options were considered in earlier stages and why they had been rejected.”
- 1.1.11 Section 5 of the SA Report (2023) explained a process over time that led to the definition of reasonable alternatives that were then a focus of the appraisal presented in Section 6. The primary aim of Section 5 was to present “an outline of the reasons for selecting the alternatives”, and in doing so a secondary aim was to present ‘policy relevant’ information of use to those making representations on the Local Plan.
- 1.1.12 The aim was not to present an audit trail of past work, given there is no requirement to do so and because presenting an audit trail risks a lengthy SA Report with the reader distracted by information that is not entirely policy relevant or even entirely out-of-date. The latter is an important consideration, given the context of a recent Government consultation having described SA as “... a nightmare... unintelligible...”
- 1.1.13 We feel it is important not to unduly set a precedent but equally are more than happy to bolster “outline reasons” (Section 5 of the SA Report) by presenting additional information on past SA work undertaken (voluntarily) at the two Regulation 18 consultation stages in 2017 and 2018. See Appendix I.

2 The proposed main modifications

2.1 Introduction

- 2.1.1 The aim here is to introduce and ‘screen’ the proposed main modifications (MMs) in order to enable targeted discussion / appraisal in the subsequent two sections.
- 2.1.2 The context is that the focus of appraisal must be on the MMs as a whole (just as the focus of appraisal within the SA Report, 2023, was the Local Plan as a whole) and that SA must focus on ‘significant effects’ where significance is understood in the context of the Local Plan as a whole.
- 2.1.3 Within the SA Report this understanding translated into a strong focus on what might be loosely termed the ‘spatial strategy’, but which might more precisely be defined as the key diagram and the associated strategic and parish allocations with a direct bearing on the quantum, location and timing of growth.
- 2.1.4 Given this context, it might be suggested that the scope of MMs that need be a focus of SA is very limited, because the MMs clearly have limited if any significant implications for the spatial strategy (as discussed below), and it might even be suggested that MMs-focused SA work is not needed.
- 2.1.5 However, regardless of considerations around significant effects, this report is an opportunity to focus attention on, and explore issues and impacts around, those MMs that stand-out as *more significant*.

2.2 Screening the main modifications

- 2.2.1 The Inspectors’ post hearings letter provides a very helpful starting point. From the letter it is readily apparent that a key proposal relates to a decision to increase the housing requirement, i.e. the number of homes that the local plan commits to delivering over the plan period in the knowledge that under-delivery (as understood on the basis of monitoring)¹ could lead to issues in respect of the District being subject to the presumption in favour of sustainable development (NPPF paragraph 11).
- 2.2.2 The Inspectors’ Post Hearing Letter explains:

“Whilst we have found that the evidence base in regard to transport is sufficiently up to date, adequate and proportionate, we have not been convinced that it justifies a housing requirement below Local Housing Need (LHN). There is not the clear evidence before us that any significant impacts from housing development, at development levels up to the LHN as calculated for the Plan, on the transport network (in terms of capacity and congestion), or on highway safety, cannot be cost effectively mitigated to an acceptable degree, nor are we convinced that such a level of development would give rise to unacceptable impacts on highway safety, or that the residual cumulative impacts on the road network would be severe...

Consequently, we do not find that there would be adverse transport impacts arising from meeting objectively assessed needs (OAN) which would significantly and demonstrably outweigh the benefits of meeting housing OAN in full. Or put another way, the evidence before us does not persuade us that a housing requirement of 90% of LHN is justified, whilst one at 100% would not be. Therefore, we do not accept that the application of NPPF11 b ii justifies a housing requirement below LHN.

Policy H1 should be amended so that the minimum housing requirement for the full plan period is a minimum of 11,484 dwellings, not 10,350 dwellings as per the submitted Plan...”
- 2.2.3 This is an important change, given growth-related constraints / issues locally, as explored through the plan-making / SA process prior to submission. Transport is a key constraint locally, as discussed in detail in the Inspectors’ Post Hearings Letter, but there are also wider constraints to growth.
- 2.2.4 Given the constraints to growth, a decision to increase the housing requirement has the potential to generate significant effects on the face of things. However, concerns are allayed by the fact that the proposal is to boost the housing requirement only in the latter years of the plan, specifically from 2030/31.

¹ Under the NPPF housing supply is monitored and evaluated both looking backwards (the Housing Delivery Test) and looking forward (with a requirement to maintain a rolling five year housing land supply, plus an appropriate buffer).

2.2.5 The Post Hearings Letter explains:

“The annualised housing requirement for the years 2021/22 to 2029/30 should therefore be 575 dpa [as per the Submission Plan]. This figure is derived from the net completions to date, and net completions likely to arise from the identified five-year housing land supply... That would ensure that there would be a marginal five-year supply of housing on adoption of the plan, including a 5% buffer. For the years 2030/31 to 2038/39 the annualised requirement should be 701 dpa to reflect the higher level of completions anticipated in the latter part of the plan period in the housing trajectory.”

2.2.6 The other key point to note is that the proposal is not to identify further supply in order to provide for the boost to the housing requirement, but rather to commit to identifying further supply through a Site Allocations DPD (i.e. a ‘daughter’ plan) or a new Local Plan. Boosting the housing requirement without identifying specific sites (or even a spatial distribution; parallels can be drawn with parish allocations) leads to an element of uncertainty, such that it is difficult to accurately predict effects. However, any concerns in this regard should not be overstated as the number of homes in question is fairly modest. Specifically, over the plan period the difference between the identified supply and the housing requirement is ~600 homes, such that the task of a Site Allocations DPD would be to allocate sites to deliver at least 600 homes (i.e. it might look to identify supply amounting 600 homes plus a ‘supply buffer’).² This 600 homes figure can also be described as relatively modest in the knowledge that the latest standard method LHN figure for the District – which would need to be taken into account should the District decide to proceed with a new Local Plan rather than a Site Allocations DPD – is significantly higher than the equivalent figure that is used for the basis of preparing the current plan.

2.2.7 With regards to the ‘spatial strategy’ there are then two further key proposed modifications to note.

2.2.8 Firstly, with regards to the distribution of growth between the southern plan area and the northern plan area (i.e. the relatively rural area to the north of the South Downs National Park), the Inspectors explain:

“Paragraph 5.2 of the submitted Plan refers to 535 dpa applying in the southern plan area, and 40 dpa applying in the northern plan area. These figures have not been justified, and given they are not included in Policy H1 of the submitted Plan, would not be effective in this regard. A main modification should be made to delete these figures with consequential changes made as necessary.”

2.2.9 The effect is to clarify a pre-existing position whereby there was some ambiguity as to whether the plan would have a single housing requirement (against which supply would then be monitored) or two housing requirements, namely one for each of the two plan areas.

2.2.10 As such, it is difficult to suggest any substantive implications that should be a focus of appraisal (i.e. which might give rise to significant effects). However, on the other hand, it is simply the case that removing a clear reference in the plan to a spatial strategy that focuses growth overwhelmingly in the southern plan area could feasibly have some bearing. In particular, there could be implications for work to prepare a Site Allocations DPD. Also, there is a need to consider a possible future scenario whereby the District is (or is at risk of being) subject to the presumption in favour of sustainable development such that there is a need to consider supporting significant greenfield planning applications Local Plan allocations.³

2.2.11 Secondly, there is a need to consider the following paragraphs from the Inspectors’ Letter regarding ‘A27 Chichester Bypass Mitigation’:

“Through the examination, the Council has suggested a number of main modifications to Policy T1 (SD10.04). These include the definition of charging sectors and apportionment and averaging factors to be applied to the Target Contribution Level of £8,000 per dwelling (average) for development to contribute to the transport mitigation funding requirement in the south of the plan area. This has not been subject to consultation, and the views of interested parties on this are not therefore available to us.

² This is the difference between identified supply over the plan period and the new proposed housing requirement (11,484 homes), where identified supply comprises: A) completions and permissions as of 31st January 2025; B) a windfall assumption; and C) new strategic and parish allocations identified in the Local Plan. The figure would be higher if completions and permissions were counted only up to a cut-off date of 31st March 2022, as per the Submission Local Plan, reflecting the fact that numerous sites have unexpectedly gained planning permission between 31st March 2022 and 31st January 2025.

³ It should be noted that the District has been subject to ‘the presumption’ over recent years, and that five year housing land supply is ‘marginal’ at the point of plan adoption and over the early years of the plan period.

The transport modelling undertaken for the Plan has been used to inform the cost apportionments, along with 2021 Census data and DfT National Trip End Model Car Ownership Forecasts. It is clear to us that the transport modelling is reaching the end of its useful life, and it is intended that it will be replaced by a new model in the short term. Consequently, the apportionment and averaging factors would need to be reconsidered in the context of the new model and the development of the monitor and manage approach. So, we do not find that the proposed inclusion in the Plan at this stage of the charging sectors and apportionment and averaging factors to be justified and nor are they necessary for soundness, and we do not intend to recommend a main modification to that effect. Furthermore, to do so would unnecessarily delay the adoption of the Plan.”

2.2.12 The situation is complicated because main modification-making has been an ongoing process post submission / over the course of the Examination. However, the simple fact is that A27 mitigation is a key consideration that must factor into the appraisal of the proposed new higher housing requirement.

2.2.13 Other than matters relating to the spatial strategy, the Inspectors' Letter also discusses:

- Strategic Flood Risk Assessment – *“We have now considered the additional documents in relation to the SFRA and the responses received to our Inspector led consultation. At this point we are not minded to recommend any Main Modifications arising from these, or request that further work is undertaken. The Council should secure the formal views of the Environment Agency on these documents for our consideration prior to the main modifications being finalised.”* The Environment Agency have now been consulted and are content, such that there are no MMs, but this another contextual matter (as per the matter of A27 mitigation) that warrants further consideration below, as part of the appraisal.
- Habitats Regulations Assessment – *“The latest position in respect of the mitigation of the potential effects of ammonia deposition on the Mens SAC is set out in CDC18. Whilst it would appear that a breach of the critical threshold for ammonia is not expected to occur until towards the end of the plan period, it nevertheless is expected to occur within the lifetime of the Plan before us. Appropriate mitigation should therefore be made through this Plan to address this issue. We invite the Council to provide us with the wording of a main modification to address this matter.”* New policy wording is now proposed as a MM and so must be considered further through the appraisal, plus there is a need to consider any implications for proposed MMs in respect of the spatial strategy.
- Self-build and custom housing – *“Submitted Policy H6 includes that new sites over 200 units which are allocated in the Local Plan will be required to provide self and custom build serviced plots as set out in the relevant site-specific allocation policies, and in all other instances 2% of market units provided on strategic scale housing sites should be self-build and custom housing. The Council has suggested main modifications to increase this to 5%... The Council's Self and Custom Build Note (H13) identifies that demand for self-build and custom build homes is up to 53 dwellings per annum. It also identifies that windfall provision accounts for around 28 dwellings per annum on average. In principle, this justifies the Plan seeking to secure provision of custom and/or self build plots through sites of over 200 dwellings and the strategic scale housing allocations. Given that the requirements of Policy H6 would apply only to large and strategic scale sites which do not yet have planning permission, and having regard to the amount of new dwellings anticipated to come forward from those sources, the 2% requirement set out in the submission local plan would have little effect on meeting the residual need beyond that arising from windfall sites. Therefore, we are content that the proposed figure of 5% as set out by the Council is justified. In reaching this view we have taken into account the policy requirement for marketing such plots and that they can revert to conventional market housing if unsold after 12 months.”*
- Horticultural Development – *“Further to the discussion at the hearing and receipt of the statement of common ground on 27 November 2024 (PS/SC15/16a), we are broadly content with the Council's suggested main modifications [to Policy E4] as amended.”*
- Strategic Wildlife Corridors – *“In respect of Policy NE4, we note that modifications are proposed to remove reference to the sequential test and support this approach... We acknowledge that there is some inconsistency between the approach of the Council and the Parish Councils in respect of the exact definition of strategic wildlife corridors, with particular regard to the width and size of the identified corridors, and the acceptability of development within proximity to the corridors. It should be made clear within the Plan whether the approach to strategic wildlife corridors is a strategic approach, which would allow other planning documents to refine exact boundaries, or whether the boundaries set out in the local plan are intended to be strictly interpreted for the purposes of directing development.”* The latest proposal is for the boundaries to be strictly interpreted.

- Chidham and Hambrook – *“In respect of Policy A12, it was discussed at the hearing sessions whether the wording of the policy should be amended to recognise that the development within that policy is largely committed, and to provide clarity as to the further extent of housing which should be brought forward. As submitted the Policy is not justified or effective as it purports to require land to be allocated when the level of such housing has in effect been met... We appreciate the comments made that the policy would be necessary should the committed development fail to come forward in full... However, the Policy and explanatory text should be amended to make it clear that sufficient land has already been committed to meet the 300 dwelling allocation, and that the policy would apply in the event that different schemes were to come forward rather than those committed.”*
- Southbourne Broad Location for Development – *“Similar to Policy A12, Policy A13 should be amended to make clear the residual number of dwellings which should be planned for in the Southbourne Allocation Development Plan Document to ensure that the policy is effective and factually correct.”*

2.3 Screening conclusion

- 2.3.1 The conclusion of the discussion above is that attention focuses on the proposal to increase the housing requirement, and that this must be appraised in the context of latest understanding in respect of A27 mitigation. A secondary issue is then the proposal to delete text quantifying the extent to which the spatial strategy is focused on the southern plan area (as opposed to the northern plan area). Beyond this, the other discrete matters covered within the Inspectors' Post Hearings Letter do warrant consideration through the appraisal, but it is difficult to envisage any significant effects. Finally, there are a number of other proposed MMs not referenced within the Inspectors' Letter that can be referenced within the appraisal, albeit there is clearly no potential to reach conclusions on significant effects.

3 Reasonable alternatives

3.1 Introduction

- 3.1.1 In light of the discussion above – which aims to present an overview of the proposed MMs with the potential to give rise to ‘significant effects’ (alone or in-combination) – there is a need to make a decision regarding whether or not there is a need to formally define and appraise reasonable alternatives (RAs).
- 3.1.2 By way of context, the SA Report (2023) focused attention on RA ‘growth scenarios’, essentially in the form of alternative key diagrams. In practice, two sets of RA growth scenarios were defined (Section 5 of the SA Report) and then appraised (Section 6 of the report), namely one for each of the plan areas.
- 3.1.3 It is reasonable to focus attention on RA growth scenarios for two reasons: A) this ensures a focus on a matter at the very heart of the plan which aligns with the legal requirement to define RAs “taking into account the objectives and geographical scope of the plan”; and B) it guarantees a focus on RAs for which meaningful conclusions can then be drawn in terms of differential ‘significant effects’ through the appraisal.
- 3.1.4 In turn, the question is whether there are any reasonable growth scenarios at the current time, in light of latest evidence and understanding, including understanding generated through the EiP to date.
- 3.1.5 More specifically, the question is whether there are any alternative approaches that might be taken (relative to the latest proposed approach, as introduced in Section 2) involving: lower growth; higher growth; or an alternative approach to distributing the preferred growth quantum.

3.2 Lower growth?

- 3.2.1 There is no reasonable need to explore the possibility of reducing supply from the proposed strategic and parish allocations at this stage. However, there is potentially the option of reducing the housing requirement such that it aligns with the identified supply over the plan period. The effect would be that the Local Plan generates unmet need, and this understanding could then, in theory, feed-into plan-making elsewhere across the sub-region. However, in practice there is no confidence that unmet need would or even could be provided for, such that a better strategy is to set a requirement that serves as a motivation for Chichester District to boost supply at the earliest opportunity.

3.3 Higher growth?

- 3.3.1 Unmet need across the sub-region was recognised as an issue at the time of preparing the Local Plan ahead of submission, and the situation has certainly not improved since that time. The theoretical possibility of a housing requirement set above LHN in order to make provision for unmet need from elsewhere (and/or to more fully providing for affordable housing needs) was considered in Section 5.2 of the SA Report but ruled out with relative ease. This was primarily on the basis of an understanding of: A) A27 capacity / potential for mitigation (including potential junction upgrades) in the southern plan area; and B) limited capacity for growth in the northern plan area (which is distinctly rural); however, there was also the context of well-understood wider constraints to growth (e.g. paras 5.2.18 to 5.2.59 of the report).
- 3.3.2 Focusing on transport constraints, and as discussed, the Inspectors' Post Hearings Letter concludes that the resultant impacts are not severe enough to warrant a housing requirement set below LHN, as per the proposal within the Submission Local Plan. However, equally the Letter is clear that transport constraints do exist and serve as a clear reason for not setting the housing requirement at a figure above LHN:
- "Equally, there is not the evidence to demonstrate that a specific level of housing development above LHN would also be acceptable in transport terms."*
- 3.3.3 This is strong evidence upon which to base a decision to rule out a housing requirement > LHN as unreasonable at the current stage in the plan-making process.
- 3.3.4 Furthermore, there is the context of the discussion in Section 2 regarding the current proposal to boost the housing requirement (such that the requirement = LHN) without identifying specific new supply. This is not necessarily problematic, as discussed above, but a *further* boost to the housing requirement without identifying specific new supply could lead to challenges. Amongst other things, it would require close collaborative working between authorities within the Transport Infrastructure Management Group (TIMG) to ensure that appropriate infrastructure can be realised in sufficient time so as to provide confidence in the council's ability to deliver on the housing requirement. In turn, the question is whether it is reasonable to explore boosting supply at this current stage, but the possibility of doing so is discussed in the Inspectors Post Hearings Letter and ultimately not supported. This is essentially because the effect would be to significantly delay plan adoption, when a better approach is to adopt the Local Plan and then commence work on a Site Allocations DPD or a new Local Plan.

3.4 An alternative approach to distribution?

- 3.4.1 The Inspectors' Post Hearings Letter does not flag any of the strategic and parish allocations within the Submission Local Plan as more challenging or contentious, such that there is no case at the current time for reducing supply from allocations and replacing it with new supply from elsewhere (i.e. by introducing one or more omission sites, by introducing a new parish allocation or by boosting supply from one or more of the current strategic and parish allocations).

3.5 Conclusion

- 3.5.1 In conclusion, there are currently no reasonable alternatives.

4 Appraisal of proposed Main Mods

4.1 Introduction

- 4.1.1 The primary aim of this section is to present an appraisal of the proposed MMs, as introduced above, under the SA Framework (see Section 3 of the SA Report), at the core of which is a list of 13 topics.
- 4.1.2 The aim is not to discuss every MM systematically under each element of the SA framework, but rather to present a targeted discussion guided by the screening work in Section 2.
- 4.1.3 A secondary aim is then to consider the ('cumulative') effect of the proposed MMs in combination with those aspects of the Submission Plan not proposed to be modified and, in doing so, update the conclusions on the Submission Plan reached within the SA Report (2023).

4.2 Accessibility

4.2.1 By way of context, the SA Report (2023) concluded as follows:

“In conclusion, the plan directs a good level of growth to locations with the potential to deliver new / upgraded community infrastructure alongside housing, but does also distribute growth across eight parish allocations, including: 220 homes to Loxwood; 156 homes to Chidham and Hambrook; and 50 homes to Kirdford (where there is no primary school). N.B. all figures relate to supply over-and-above completions, commitments and windfall. In each case there are no significant concerns regarding community infrastructure capacity, but there is still a need to be mindful of alternative strategies with a greater focus on directing housing growth so as to secure new/upgraded strategic community infrastructure.

Another factor is a degree of uncertainty regarding precisely what will be delivered at / achieved through strategic expansion of Southbourne, although this is inevitable, because a broad location (instead of a detailed allocation) is a practical necessity, and appropriate as growth here will be later in the plan period.

*The proposed suite of development management policies is strong, and it is noted that the plan has been subject to viability testing, such that there are no concerns regarding development viability proving to be a barrier to delivering new / upgraded community infrastructure. Overall, there are arguments for predicting positive effects, recognising that the baseline situation is one whereby development continues to come forward in a relatively unplanned way (in line with recent experiences across the plan area); however, on balance, **neutral effects** are predicted.”*

4.2.2 As discussed in Section 2, at the current MMs stage attention focuses on the proposal to increase the housing requirement, and that this must be appraised in the context of latest understanding in respect of A27 mitigation. A secondary issue is then the proposal to delete text quantifying the extent to which the spatial strategy is focused on the southern plan area (as opposed to the northern plan area).

4.2.3 It is not possible to predict any significant concerns regarding access to community infrastructure. On the one hand, a preferable approach would be to boost the housing requirement with certainty regarding which sites will deliver the additional homes, or at least how the additional homes will be distributed, including recognising that the northern plan area is associated with relatively low levels of accessibility. However, on the other hand, Policy S1 (Spatial Development Strategy) would apply for the purposes of preparing a Site Allocations DPD, and constraints to growth affecting the northern plan area are well understood. Also, there is the context of latest evidence/understanding in respect of the extent to which A27 capacity issues act as a constraint to growth in the southern plan area (albeit understanding is subject to change).

4.2.4 None of the other proposed MMs give rise to significant implications for accessibility objectives, either alone or in combination. The proposal is to clarify residual housing numbers at Southbourne and within Chidham and Hambrook Parish, and these are both growth locations where close consideration has been given to community infrastructure issues and opportunities over the course of the plan-making / SA process, but as clarifications the proposed MMs do not give rise to any substantive implications.

4.2.5 In conclusion, the proposed MMs do not give rise to any significant implications and the conclusion reached in the SA Report broadly still holds true for the Submission Local Plan plus MMs.

4.3 Air / environmental quality

4.3.1 By way of context, the SA Report (2023) concluded as follows:

“In conclusion, whilst traffic congestion – particularly at A27 junctions – is a key consideration for the local plan, and is discussed further below, even severe traffic congestion would not necessarily translate into significant concerns in respect of air quality, being mindful of the timing of growth relative to the national switch-over to electric vehicles. Aside from air pollution, an important consideration is the proposal to direct a significant proportion of growth to locations adjacent to the A27 or a railway line, and there is a need to highlight the need for remediation of contaminated land (former landfill) at Land east of Chichester.

*The proposed suite of development management policies is strong, including clear requirements for noise attenuation measures, air quality impact assessments (to identify required mitigation measures) and requirements around ‘sustainable transport’ infrastructure upgrades alongside new homes, although there is a need to be mindful of the cost / development viability implications of all such measures. **Neutral effects** are predicted overall.”*

4.3.2 At the current time there is a clear need to focus on the proposal to increase the housing requirement, and that this must be appraised in the context of latest understanding in respect of A27 mitigation.

4.3.3 Also, by way of further context the following from the SA Report is of note:

“Southern plan area - the preferred strategy (supply totalling the agreed 537.5 dpa, so slightly above the 535 dpa ‘cap’ agreed with National Highways) is associated with a degree of risk in terms of junction capacity, given the proposed ‘monitor and manage’ strategy (see Section 5.2). There is just one small air quality management area (AQMA) in the centre of Chichester; however, severe traffic congestion at A27 junctions – were this to arise – could potentially lead to problematic localised air pollution.”

4.3.4 Overall, the key consideration is perhaps proposed amendments to A27 mitigation, more so than the proposal to boost the housing requirement, as the boost only applies later in the plan period (as discussed in Section 2). Specifically, the proposal is twofold:

- **MM62** – seeks to ensure a clear and strong focus on a ‘monitor and manage’ approach – this approach is considered firmly justified, as summarised by new proposed supporting text: *“Since the original A27 schemes were developed the political, social, and economic environment has dramatically changed... Given the unaffordability of the full mitigation package, a change in national policy to increase modal choice and reduce reliance on the need to travel by car and a need to ensure that the mitigation delivered is most appropriate at that time, the actual schemes to be delivered on the A27 and elsewhere will now be determined from updated evidence as part of the monitor and manage process... This represents a shift away from the previous approach of ‘predict and provide’ which forecasts the predicted growth in traffic and provides mitigation based on the forecast growth.”*

- **MM63** – deletes a proposed formula for calculating the level of A27 mitigation financial contributions that should be made by planning applicants, on the basis that a method for determining contributions will need to be arrived at following new modelling work as part of the monitor and manage process (as discussed in Section 2). The context is also that the Council had proposed to amend / improve the formula post submission, recognising its considerable importance.

The effect of deleting the formula from the Submission Local Plan / not accepting the new and improved formula proposed by the Council post submission does allow for a more informed approach long term, as to funding requirements of required mitigation, but may introduce greater uncertainty in the short term. This issue is manageable within the development management process (as evidenced by the experience of recent years), allowing for development to continue without significant delay, although it will be important to account for consultation responses received on this matter.

4.3.5 None of the other proposed MMs give rise to significant implications for accessibility objectives, either alone or in combination. The matter of ammonia deposition on the Mens SAC is discussed below.

4.3.6 In conclusion, the proposed MMs give rise to some notable implications for A27 mitigation and also potentially maintenance of a five year housing land supply. However, there is little reason to suggest that the effect is to generate significant concerns in terms of air / environmental quality objectives.

4.3.7 With regards to the conclusion reached in the SA Report, namely a conclusion that the plan gives rise to a ‘neutral effect’, this is considered broadly to hold true for the Submission Local Plan plus MMs.

4.4 Biodiversity

4.4.1 By way of context, the SA Report (2023) concluded as follows:

“In conclusion, biodiversity has clearly been a major factor influencing spatial strategy / site selection. Growth is mostly directed to locations with limited biodiversity sensitivity; the nutrient neutrality constraint has been a key influence on the strategy for the southern plan area; and the quantum of growth in the northeast plan area is well below the level assumed by the recent Water Neutrality Mitigation Strategy.

*Also, the approach of designating strategic wildlife corridors is considered highly proactive. However: the proposal is to require only 10% biodiversity net gain; the possibility of adding more detail to site and area-specific policy might be envisaged (to increase confidence around avoiding/mitigating impacts and realising opportunities); and the strategy of relying on parish allocations inevitably gives rise to a degree of uncertainty (as specific site allocations are not known). On balance, **neutral effects** are predicted.”*

- 4.4.2 The key matter currently relates to the Mens SAC, as introduced in the Inspectors' Post Hearings Letter:

"The latest position in respect of the mitigation of the potential effects of ammonia deposition on the Mens SAC is set out in CDC18. Whilst it would appear that a breach of the critical threshold for ammonia is not expected to occur until towards the end of the plan period... Appropriate mitigation should... be made through this Plan to address this issue. We invite the Council to provide us with the wording of a main modification to address this matter."

- 4.4.3 A new policy is now proposed as **MM14**, as follows:

Policy NEXX – The Mens SAC and Air Quality

The council will undertake monitoring of traffic and the proportion of petrol and hybrid vehicles and ULEVs on the A272, passing The Mens SAC, as part of a review of the Plan within 5 years of adoption or any earlier review.

If the outcome of monitoring (in 1.) identifies that the trajectory of the combined petrol and hybrid vehicle trips on the A272 passing The Mens SAC is likely to be higher than 14% of total trips by March 2039, then any development proposals in the North of the Plan Area for a net increase in housing/dwellings must demonstrate they will not, from the outcome of the monitoring onwards, contribute to any cumulative increase in ammonia arising in the Mens SAC that would result in an in-combination effect above the 1% critical level threshold from the base date of 2022. In such cases planning permission will only be granted where a suitable mitigation strategy can be identified and secured (through planning obligations or such other appropriate and enforceable planning mechanisms) to avoid an in-combination effect of ammonia deposition on The Mens SAC above the 1% critical level threshold from development.

- 4.4.4 This policy is considered robust. With regards to the wider matter of boosting the housing requirement / adjusting wording relating to spatial strategy, it is not possible to suggest any specific concerns regarding growth in the northern plan area, where the Mens SAC acts as a constraint, as discussed above.
- 4.4.5 Finally, there is also a need to briefly consider Strategic Wildlife Corridors, as covered by **MM11** and several other MMs. The key consideration is a proposal to delete a requirement for a 'sequential approach' (specifically, previous text which stated: *"Within the corridors it will be necessary to demonstrate that no land outside the corridor is available for development"*); however, this does not generate major concern.
- 4.4.6 In conclusion, the MMs give rise to a degree of tension with biodiversity objectives, but there is no reason to suggest concerns of any particular significance. The conclusion reached in the SA Report broadly still holds true for the Submission Local Plan plus MMs.

4.5 Climate change adaptation

- 4.5.1 By way of context, the SA Report (2023) concluded as follows:

"In conclusion, work in respect of spatial strategy and site selection has had a clear focus on accounting for flood risk, which is a primary climate change adaptation consideration, and a very significant issue across the southern plan area, most notably on the Manhood Peninsula. The Southern Gateway Regeneration Area is the key proposed allocation subject to flood risk, with the key issue being the proposal to support development on the greenfield Police Field part of the site. However, there will be good potential to take steps to avoid and mitigate flood risk, and residual flood risk must be balanced against the wide-ranging benefits of the regeneration scheme, e.g. noting nearby Chichester train station.

*The proposed suite of thematic development management policies is strong, although the possibility of setting more detailed requirements in respect of 'sustainable design' (notably with an increased focus on avoiding overheating risk, which is a key climate change adaptation consideration) might be envisaged. Policies also assist with ensuring a clear framework under which further work might be undertaken in respect of long term planning for those parts of the Manhood Peninsula that are protected by coastal defences. Overall **neutral effects** are predicted."*

- 4.5.2 At the current time, there are no concerns of note in respect of the housing requirement, spatial strategy or A27 mitigation, hence attention focuses on the following from the Inspectors Post Hearings Letter:

“We have now considered the additional documents in relation to the [Strategic Flood Risk Assessment, SFRA] and the responses received to our Inspector led consultation. At this point we are not minded to recommend any Main Modifications arising from these, or request that further work is undertaken. The Council should secure the formal views of the Environment Agency on these documents for our consideration prior to the main modifications being finalised.”

- 4.5.3 The Environment Agency have now been consulted and are content, such that there are no MMs. A key consideration will be ensuring that clear understanding of flood risk affecting the Manhood Peninsula, accounting for coastal defences/management now and in the future, feeds into future work on a Site Allocations DPD or a new Local Plan (recalling that a new Local Plan would have to be prepared in the context of a standard method LHN figure that is significantly higher than the figure used as the basis for the Local Plan currently being examined).
- 4.5.4 In conclusion, the proposed MMs give do not give rise to any notable implications for flood risk or wider climate change adaptation objectives, and the conclusion reached in the SA Report broadly still holds true for the Submission Local Plan plus MMs.

4.6 Climate change mitigation

- 4.6.1 By way of context, the SA Report (2023) concluded as follows:

*“In conclusion, there is a need to flag **moderate or uncertain negative effects**, mindful of the urgency of the issue (albeit on the other hand, Chichester District has not set a net zero target date ahead of the national 2050 target date; also, climate change is a global issue such that the significance of local actions is inherently limited). This largely reflects the decision not to set requirements on new development, in respect of built environment decarbonisation, that go beyond the requirement of Building Regulations (albeit it is recognised that there are quite clear arguments in support of this approach, particularly in the Chichester context, given competing funding priorities). However, it is also the case that it is difficult to pinpoint particular ways in which the preferred spatial strategy will help to ensure that built environment decarbonisation opportunities are fully realised (although performance in respect of transport decarbonisation is overall quite strong). Also, the plan says little on a host of built environment decarbonisation issues / opportunities that are often a major focus of local plans, potentially leading to an opportunity missed in respect of communicating the issues and education.”*

- 4.6.2 This conclusion broadly still holds true for the Submission Local Plan plus MMs, and it is very difficult to suggest that the proposed MMs give rise to any implications of note. There is also the wider national context of the policy environment in respect of setting net zero development requirements through local plans (subject to development viability considerations) has moved on considerably since the time of preparing the SA Report. This will likely be a factor with a bearing on the question of whether to prepare a Site Allocations DPD or a new Local Plan.

4.7 Communities and health

- 4.7.1 By way of context, the SA Report (2023) concluded as follows:

*“In conclusion, one of the key defining features of the proposed submission local plan is its strong emphasis on delegating the responsibility for making formal allocations to neighbourhood plans, building on the experience of implementing the adopted local plan (2015). This approach is broadly supported, from a communities’ perspective, albeit there can also be strong ‘communities’ arguments for making allocations through local plans, with a view to ensuring that issues are addressed and opportunities realised. The Southern Gateway Regeneration Area proposal is also strongly supported, from a communities’ perspective, and the proposed suite of thematic development management policies is strong. Overall **‘moderate or uncertain positive effects’** are predicted.”*

- 4.7.2 This conclusion broadly still holds true for the Submission Local Plan plus MMs, and it is very difficult to suggest that the proposed MMs give rise to any implications of note. One matter is clarifying parish allocations such that there is a focus on residual housing required (i.e. total housing required over the plan period minus existing supply from completions and commitments), which is clearly of assistance to neighbourhood planning (albeit residual figures will change annually in light of monitoring data updating completions/commitments), but it is not possible to suggest and substantive implications for communities and health objectives. Finally, it should be noted that there are links to ‘homes’ objectives (see below).

4.8 Economy and employment

4.8.1 By way of context, the SA Report (2023) concluded as follows:

“In conclusion, the plan should lead to significant positive effects on the baseline (which, it is important to recall, is a situation whereby development continues to come forward, but in a less planned way). The key consideration is the proposal to meet objectively assessed development needs through allocation of a new strategic site that judged to perform strongly, from an economy and employment perspective, although it will be important to account for views of Arun District, as received through consultation.”

4.8.2 This conclusion broadly still holds true for the Submission Local Plan plus MMs, and it is very difficult to suggest that the proposed MMs give rise to any implications of note. A27 congestion and mitigation is a consideration, but it is not possible to suggest any clear links with economy/employment objectives.

4.8.3 The only other consideration is Horticultural Development, as covered by MM58 (also a statement of common ground; PS/SC15/16a), but there are modest overall implications. Specifically, the new focus within Horticultural Development Areas (HDAs) is on horticultural and “functionally linked” uses as opposed to horticultural and “ancillary” uses. The implication is that there is greater clarity for the horticultural industry regarding what types of development will be supported within HDAs (including, but not limited to, storage and distribution facilities, food processing and packaging, research and development and the production of renewable energy/provision of energy hubs). Proposed supporting text also explains:

“In order for a proposal to be considered as functionally-linked development, the planning application will need to evidence demonstrable benefits of co-location within the HDA (i.e. the contribution to local synergies and/or the reduction in food miles and in carbon emissions).”

4.9 Historic environment

4.9.1 By way of context, the SA Report (2023) concluded as follows:

*“In conclusion, there is a degree of tension with historic environment objectives, which is fairly inevitable in the context of local plan-making, but there is a need to recall the baseline situation, which is one whereby development continues to come forward in a relatively unplanned manner. Taking account of the proposed suite of site specific and plan area-wide thematic development management policies, **neutral effects** are predicted on balance. However, Historic England will wish to comment further, noting significant changes to the proposed strategy / package of supply components since consultation in 2018.”*

4.9.2 At the current time, there are no particular concerns in respect of the housing requirement, spatial strategy or A27 mitigation, albeit the possibility of a modest degree of increased pressure for growth in the northern plan area is of note. It is also noted that there are a range of changes proposed to the development management (DM) policy, but this is only with a view to bring the policy into line with the NPPF, such that there are no substantive implications (also in the context of forthcoming National DM Policies).

4.9.3 In conclusion, the proposed MMs give do not give rise to any notable implications for historic environment objectives, and the conclusion reached in the SA Report broadly still holds true for the Submission Local Plan plus MMs.

4.10 Homes

4.10.1 By way of context, the SA Report (2023) concluded as follows:

*“In conclusion, there is a clear need to predict **significant negative effects**, given the proposal to generate significant unmet needs, and given that there are clear challenges in respect of meeting unmet needs. However, it is important to be clear that it is difficult to envisage a reasonable alternative strategy that performs significantly better, in terms of meeting housing needs, without giving rise to significant drawbacks in respect of other plan and wider sustainability objectives. In other respects the plan performs well, including an approach to meeting Gypsy and Traveller accommodation needs that is on balance considered proactive (albeit there are delivery risks, and overall some risk of unmet needs).”*

- 4.10.2 The effect of the MMs is clearly significant, and overall it is considered appropriate to 'boost' the conclusion to one of an overall **neutral effect**. Specifically, the proposal to boost the housing requirement is clearly supported although, as discussed in Section 2, the housing requirement is boosted only in the latter years of the plan period (i.e. there is a 'stepped requirement'), the proposal is not to identify specific supply. There is also the matter of the 'supply buffer', i.e. the difference between the identified supply and the housing requirement, which is a particular consideration in the early years of the plan period where the buffer is "marginal", but it is difficult to suggest any concerns from a 'housing' perspective, because if the Council loses its five year housing land supply, then the presumption in favour of sustainable development would come into force.
- 4.10.3 The other matter is self-build and custom housing, with the proposed MM described in detail in the Inspectors Post Hearings Letter and also above, in Section 2 of this report. Overall, there is strong support for the MM from a 'homes' perspective, as self-build and custom housing is an important means of enabling households to meet their housing needs, and there is no reason to suggest any implications for development viability or otherwise implications for bringing forward development sites in a timely manner.

4.11 Land, soils, resources

- 4.11.1 By way of context, the SA Report (2023) concluded as follows:

*"In conclusion, there is a need to predict **significant negative effects**, given the likely scale of loss of high quality BMV agricultural land, likely to include land of grade 1 quality. However, it is important to note that it is difficult to envisage a reasonable alternative strategy, given a clear need to plan for 535 dpa in the southern plan area and focus growth along the east-west corridor. Ideally further consideration might be given to how best to avoid highest quality agricultural land through detailed site selection, but the available evidence is very limited. Aside from agricultural land, minerals safeguarding areas are an extensive constraint across the southern plan area, but it seems unlikely that there will be a requirement to extract minerals ahead of development at any of the proposed allocations."*

- 4.11.2 This conclusion broadly still holds true for the Submission Local Plan plus MMs, and it is very difficult to suggest that the proposed MMs give rise to any implications of note. Moving forward it will be important to ensure clarity regarding how / the extent to which grade 1 agricultural land feeds into spatial strategy and site selection (also work to decide a new housing requirement, if and when the Council prepares a new Local Plan).

4.12 Landscape

- 4.12.1 By way of context, the SA Report (2023) concluded as follows:

*"In conclusion, there is a degree of tension with landscape objectives, which is fairly inevitable in the context of local plan-making, but there is a need to recall the baseline situation, which is one whereby development continues to come forward in a relatively unplanned manner. The Landscape Capacity Study (2019) provides a valuable source of evidence (also the Landscape Gaps Study, 2019) and has clearly had a key influence on spatial strategy / site selection, with the main issue potentially relating to allocation of Highgrove Farm (although it is important to recall that this site has merit in other respects, notably walking distance of a train station). The proposed suite of site-specific and plan area-wide thematic development management policies is strong, and so overall **neutral effects** are predicted."*

- 4.12.2 Again it is the case that there is a degree of tension on account of the proposal to boost the housing requirement without identifying specific new supply, but it is not possible to conclude a significant concern. Within the southern plan area a key issue is maintaining settlement gaps / distinct settlement character, and in the northern plan area there are also sensitivities given a characteristic rural landscape.

4.13 Transport

4.13.1 By way of context, the SA Report (2023) concluded as follows:

*“In conclusion, transport objectives have had a key influence on spatial strategy and site selection, and, from a transport perspective, it is crucial to adopt a local plan as soon as possible, in order to avoid a situation whereby there is continued problematic unplanned growth. Key considerations relate to: A) whether it is appropriate to identify supply in the southern plan area amounting to precisely 535 dpa (9,630 homes in total) or alternatively 535 dpa plus a modest supply buffer; and B) the number of homes that should be directed to the northeast plan area, mindful that whilst this area is poorly connected in transport terms, the implication of lower growth is increased unmet needs, which is also problematic in transport terms; and C) the distribution of housing growth, e.g. directing growth to locations with best ‘sustainable transport’ connectivity, including the ability to walk or cycle to a train station. In all three respects the plan is judged to perform suitably well, and so **significant positive effects** are predicted.”*

4.13.2 As discussed, there is now a new perspective on A27 capacity issues and the approach to ensuring effective mitigation, with it ultimately being the case that latest understanding of the evidence serves to reduce concerns. However, on the other hand, the proposal to boost the housing requirement and to rely on site-by-site negotiations for financial contributions towards A27 mitigation gives rise to a degree of tension with transport objectives. Overall, for the Local Plan plus MMs, it is considered appropriate to downgrade the conclusion from the SA Report to a **‘moderate or uncertain’ positive effect**.

4.14 Water

4.14.1 By way of context, the SA Report (2023) concluded as follows:

*“In conclusion, ‘water’ considerations have been another key driver of spatial strategy and site selection and, from a water perspective, it is crucial to adopt a local plan as soon as possible, in order to avoid a situation whereby there is continued problematic unplanned growth. As such, the local plan should lead to **significant positive effects** on the baseline.”*

4.14.2 This conclusion still broadly holds true, as it is difficult to suggest that the proposed approach to boosting the housing requirement (without identifying specific new supply) gives rise to any concern.

4.15 Overall conclusion

4.15.1 The key consideration is the proposal to increase the housing requirement without identifying specific new supply (at this stage; i.e. specific new supply will be identified through a subsequent Site Allocations DPD or a new Local Plan) and in the context of an adjusted approach to A27 mitigation. A secondary issue is then the proposal to delete text quantifying the extent to which the spatial strategy is focused on the southern plan area. These proposed changes are supported from a perspective of supporting ‘homes’ objectives but give rise to a modest degree of tension in wider respects, most notably in terms of ‘transport’ objectives. This serves to highlight the importance of ongoing monitoring and work to monitor and manage transport impacts.

Appendix I: Supplementing the SAR

Introduction

This appendix presents additional information regarding past work to explore reasonable alternatives at the time of the two Regulation 18 consultations held in 2017 and 2018/19. As discussed in Section 1, the aim is not to present information on reasonable alternatives (because the work discussed below is very dated) but rather to bolster the “outline reasons” for selecting the reasonable alternatives that were a focus of the SA Report (SAR) in 2023.

As discussed in Section 1, the context is a recommendation from the Inspectors as follows:

“... we advise that the sustainability appraisal is organised and presented in such a way that it may readily be ascertained, without any paper chase being required, what strategic and other policy options were considered in earlier stages and why they had been rejected.”

A high level response to this recommendation is presented in Section 1, but more specifically our view on actioning this recommendation is as follows:

- The SA Report was organised and presented in the way described. Specifically, Section 6 presented an appraisal of reasonable alternatives and then Section 7 explained the Council’s response to the appraisal and, in turn, the Council’s reasons for supporting/rejecting options.
- There is no requirement to present an audit trail of past work within the SA Report beyond this. However, there is a requirement to present “an outline of the reasons for selecting the alternatives dealt with” and, as part of this, there is invariably, in the context of local plan-making, a need to explain a ‘story over time’.
- Section 5 of the SA Report aimed to present a ‘story’ as part of the explanation of “outline reasons”.
- As part of this ‘story’ it can and typically is appropriate to refer to any past appraisal work (recalling what is and is not required under Regulation 18 of the Local Planning Regulations, 2012).
- However, there is a need for caution in respect of reporting past appraisal work, where the work supported early stages of plan-making, given the latest evidence and understanding which has moved on over time.
- This applies strongly in the Chichester Local Plan context, with the plan-making process having been anything but a simple linear process, i.e. such that a straight line can be drawn between work at the Issues and Options stage (2017) work at the Preferred Approach stage (2018/19) and work in 2022/23 when finalising the plan.
- Nonetheless, we are more than happy to present further information on work from the two Regulation 18 stages (2017 and 2018/19) in order to bolster the “outline reasons” presented in Section 5 of the SA Report (2023).

Issues and Options (2017)

The Council took the voluntary step of consulting on Issues and Options in 2017 and also chose to publish an Interim SA (ISA) Report for consultation alongside.

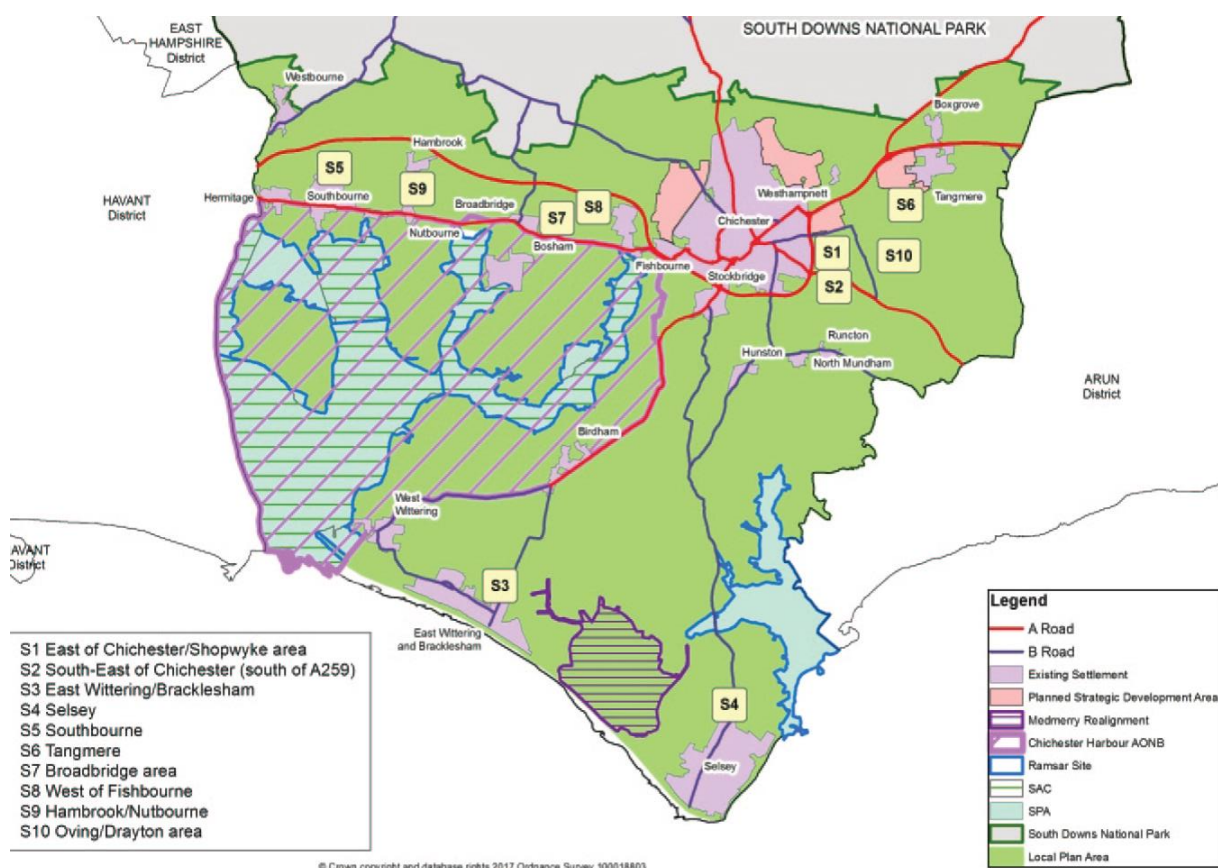
A focus of the consultation was ten areas of search for strategic growth (500+homes) and, in turn, the ISA Report presented an appraisal of each under the SA framework. Additionally, the ISA Report presented an appraisal of all other feasible locations for growth, i.e. locations that would be supported by non-strategic growth (33 in total).

It is important to emphasise that the work was high level, with no assumptions made regarding specific sites. Also, no work was undertaken at this stage to consider how sites might be delivered in combination.

Evidence from the appraisal and consultation fed into work to define reasonable alternative (RA) growth scenarios in 2022, as reported in the SA Report (2023), specifically within Section 4 (which introduced the matter of RAs) and Section 5 (which explained a process to define RAs in the form of ‘growth scenarios’). In particular, Section 5.4 of the SA Report signposted to Appendix V of the report, where growth options were considered for all parishes within the District in turn, accounting for latest understanding of strategic factors (Section 5.2; most notably latest understanding of A27 issues)⁴ and site options (Section 5.3 including HELAA work from 2021).

⁴ Paragraph 5.2.20 presented a chronology of events in respect of how understanding of A27 issues and options evolved over between 2017 and 2023. It begun by explaining: “The Issues and Options consultation document explained that A27 capacity was a key reason why the adopted local plan “was not able to meet the full identified housing need for the area.” The accompanying SA report gave close consideration to the potential impacts of site options on the A27.”

Figure A: Potential locations for strategic growth (500+ homes) that were a focus of the Issues and Options stage



Also, the Housing Distribution Background Paper (2023) summarised work from 2017 as follows:

“The locations identified for consideration continued the development strategy in the adopted Local Plan, with the emphasis placed on the east-west corridor and larger settlements, i.e. around Chichester city and the settlement hubs of East Wittering and Bracklesham, Selsey, Southbourne and Tangmere...”

The consultation responses indicated particular support for development being focused on sites around Chichester city (both strategic and non-strategic locations) and Tangmere, and the east-west corridor, especially Southbourne and Hambrook/Nutbourne, but more limited support for development being directed to locations on the Manhood Peninsula and within Oving/Drayton.

In addition to the above, the consultation sought views on the spatial principles that should inform the Local Plan development strategy. The response received demonstrated a clear preference for focusing development on brownfield land, in locations with the best accessibility to employment opportunities and facilities/services. Ensuring the character of the existing settlements was retained was also highlighted as a key issue.”

A particular concern raised by at least one objector during the Local Plan Hearing Sessions (2024) is that work at the Issues and Options stage was narrow in its focus, and that this narrow focus then unduly permeated through to influence subsequent work and ultimately the Submission Local Plan. In particular, the suggestion is that there was a narrow focus in 2017 on the basis of an understanding that the plan period would run only to 2034,⁵ whilst it then transpired that the plan period was extended to 2039. Moreover, the suggestion is that this understanding in 2017 led to large strategic site options being unduly ruled out as unreasonable.

However, this concern is unfounded, as evidenced by Section 5 of the SA Report (2023). In particular:

⁵ Concerns were mainly raised by Henry Adams Planning on behalf of Barratts, Martin Grant Homes & Crownhall Estates Limited under Matter 1 of the Hearings. It should be noted, however, that the Hearing Statement refers to work at the Issues and Options stage assuming a plan period running to 2029, which is incorrect. The plan period was expected to be to 2034. Also, and in any case, the plan period has limited bearing on consideration of strategic site options because it is common practice to allocate strategic sites that begin delivering late in the plan period and then mainly delivery beyond the plan period.

- Section 5.2 (Strategic factors) – paragraph 5.2.28 explains the merits of supporting strategic growth locations, particularly from a transport perspective, given the importance of achieving modal shift in light of A27 issues. Para 5.2.77 then explains that there is limited strategic argument for pursuing any such option, but that is not to say that the effect is in any way to rule out any such option as unreasonable.
- Section 5.3 (Site options) – the Council was open to all submitted site options, with no sites ruled out on the basis of being too large.
- Section 5.4 (Sub-area scenarios) – numerous strategic growth options are considered. Some are ruled out with relative ease on their merits, after having accounted for both strategic factors (Section 5.2) and site-specific factors (Section 5.3), but none are ruled out ‘as a rule’ on the basis of being too large in a way that might suggest any concern regarding an undue influence of earlier work from 2017 permeating through.
- Section 5.5 (Reasonable growth scenarios) – one new settlement option features in the RA growth scenarios, namely Crouchlands Farm between Kirdford and Plaistow / Ifold, although this option was then not supported for allocation, in light of the appraisal. Also, the appraisal explored the merits of two strategic approaches to growth at Southbourne, namely 1,050 homes versus 1,500 homes, with the former approach then supported.

Preferred Approach stage (2018/19)

The Council took the voluntary step of consulting on a Preferred Approach in 2018/19 and also chose to publish an ISA Report for consultation alongside.

The ISA Report presented an appraisal of three growth quanta alternatives, each associated with an assumed broad distribution, and also three alternative approaches to distributing the preferred growth quantum.

The preferred approach was to set the housing requirement at 650 dwellings per annum (dpa) in order to provide for Local Housing Need (LHN) in full plus a proportion of the unmet need arising from the South Downs National Park. As such, it is accurate to say that the preferred approach at this stage involved higher growth relative to the quantum of growth supported across the reasonable growth scenario in 2022/23, as reported in the SA Report. Furthermore, as well as this preferred growth quantum the ISA Report (2018) presented an appraisal of two higher growth scenarios, involving a housing requirement set at 800 dpa and 1,000 dpa respectively.

A key question, therefore, is why higher growth scenarios were rejected as unreasonable in 2022/23, when exploring reasonable growth scenarios ahead of Regulation 19, as reported in the SA Report (2023).

In short, the approach taken in 2022/23 reflected the latest evidence, including evidence gathered through the Preferred Approach consultation in 2018/19 plus subsequent informal consultation, stakeholder engagement and technical evidence-gathering, not least in respect of A27 capacity.

The SA Report (2023) aimed to explain key considerations across Section 5 (Defining growth scenarios), particularly within Section 5.2 (Strategic factors) and Section 5.4 / Appendix V (Sub-area scenarios). However, it was challenging to report given a lengthy and complex process with numerous steps (including backwards steps), as discussed in Section 5.4. It should also be recalled that the aim was to explain matters in ‘outline’ terms.

Additionally, the ‘story’ over time was reported in the Housing Distribution Background Paper (2023) and, on balance, it is considered appropriate to represent that discussion in full here – see **Appendix II**.

One key point to note is that increasing understanding of constraints to growth in the southern plan area on the basis of evidence gathered through and subsequent to the Preferred Approach consultation led to further consideration being given to the possibility of much higher growth in the northern plan area (relative to the Preferred Approach stage). Specifically, work was undertaken to explore this possibility from 2019 onwards, as reported in the SA Report at para 5.2.20. The strategic case for higher/high growth in the northern plan area fed in quite strongly to the process of defining RA growth scenarios in 2022/23, although equally strategic arguments *against* taking this approach were also recognised (e.g. given relating to the settlement hierarchy and poor transport connectivity), plus settlement and site-specific factors fed in (as explored in Appendix V of the SA Report).

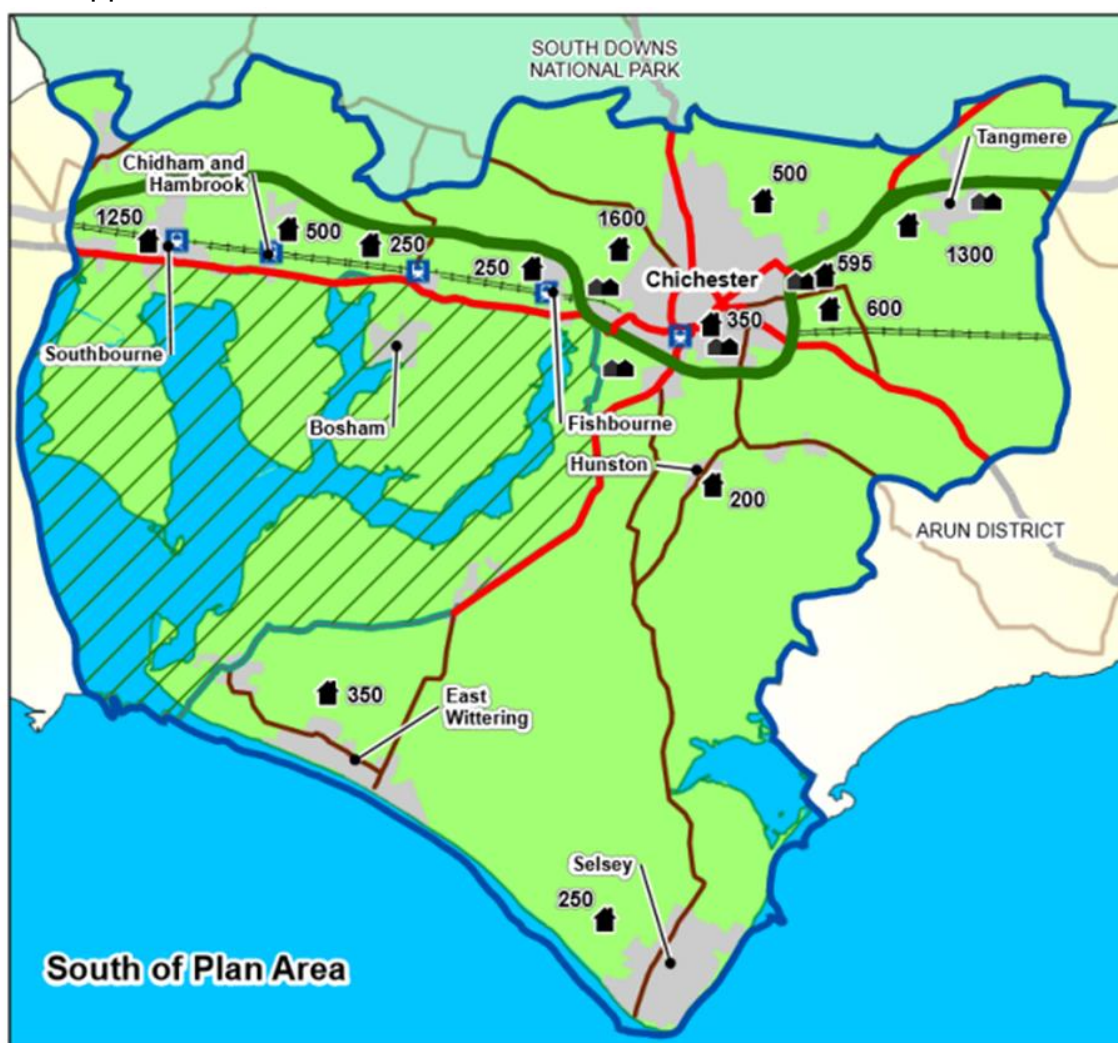
Appendix II: Extract from the Housing Distribution Background Paper

Introduction

This appendix supplements Appendix I by presenting an extract from the Housing Distribution Background Paper. Specifically, the extract below covers work at the Preferred Approach stage and subsequent work stages.

Preferred Approach (PA) Consultation/Regulation 18 (December 2018 – February 2019)

- 4.5 Following the Issues and Options stage, the approach to the distribution of housing development was refined in order to distribute the required housing number (at the time 650 dwellings per annum (dpa)⁵) between a range of strategic sites and/or locations (SSLs) (comprising specific site allocations and also strategic scale housing requirements assigned to particular parishes to deliver via neighbourhood planning) and smaller scale parish housing numbers. SSLs comprised sites or locations that could typically deliver 200 or more dwellings; housing requirements for less than 200 units were addressed by the parish numbers policy (Policy S5 within the PA). Figure 4 illustrates the approach.



⁵ This was the OAN (609dpa) plus an allowance for unmet need in that part of Chichester District falling within the South Downs National Park.

Figure 4: Map showing the proposed distribution of housing development within the Preferred Approach⁶

- 4.6 Housing development was very much focused on the southern plan area. The northern plan area settlements were all assigned non-strategic levels of development via parish numbers to be delivered via neighbourhood planning (as per Policy S5).
- 4.7 The housing distribution options were explored via the SA process⁷, which considered a number of different scenarios:
- Scenario 1 - focus on settlement hubs and east-west corridor
 - Scenario 1A - focus on settlement hubs and east-west corridor, with reduced numbers on the Manhood Peninsula
 - Scenario 2 - focus on the east-west corridor
 - Scenario 3 - focus on the area around Chichester city
 - Scenario 4 - minimise development on the Manhood Peninsula
 - Scenario 5 - dispersed (evenly spread) distribution

This is set out in sections 4.4 – 4.7 within the SA for the PA.

- 4.8 The preferred scenario taken forward to Preferred Approach was Scenario 1A, which entailed:
- Consolidating and enhancing the role of Chichester city as the plan's main area, while also developing the role of key settlements to its east and west.
 - Protecting and enhancing the special qualities and environment of the Manhood Peninsula, requiring a selective and sensitive approach to its development.
 - Placing the emphasis on maintaining the rural character of existing villages in the northern part of the plan area but recognising Loxwood as a settlement having greater development potential.
- 4.9 This reflected the findings within the SA that higher numbers on the Manhood Peninsula gave rise to the potential for negative impacts on protected coastal habitat sites, land drainage management and landscape (paragraph 4.6.2). The additional housing which would have been provided on the Manhood Peninsula was redistributed to Southbourne, Hunston and Tangmere, as these are locations which are considered more sustainable, being located closer to

⁶ Supporting text to Policy S19 within the Preferred Approach (paras 4.127-4.132) explains the constrained growth proposed in the northern plan area.

⁷ [Sustainability Appraisal for Reg 18 Preferred Approach .pdf \(chichester.gov.uk\)](#)

Chichester and/or with good access to a railway station (paragraph 4.6.4). This approach also allowed for some growth of smaller settlements.

- 4.10 In terms of the identification of SSLs within the PA, several of the adopted Local Plan SDLs were carried forward/retained (West of Chichester – AL1; Land at Shopwhyke - AL2; Land at Westhampnett – AL4) as they were still being built out and/or progressing through the planning process. New site-specific SSLs were identified at Land East of Chichester (AL3), Southern Gateway (AL5), South-West of Chichester (AL6), Bosham (AL7) and Selsey (AL12).
- 4.11 In addition to site-specific SSLs the PA identified East Wittering (AL8), Fishbourne (AL9), Chidham and Hambrook (AL10), Hunston (AL11) and Southbourne (AL13) as SSLs which would identify sites to provide for 2,550 dwellings via the neighbourhood planning process. Consideration had been given to assigning an SSL to Tangmere for 300 units to be delivered via neighbourhood planning, but development of the masterplan for the existing SDL at Tangmere demonstrated that there was the potential to increase the density of the existing SDL in order to deliver the additional 300 dwellings: this was reflected in an amended site allocation policy for Tangmere (AL14).
- 4.12 This approach to the identification of SSLs builds on the approach in the SA at the Issues and Options stage, which identified that sites in and around Chichester city were the most sustainable options in relative terms, followed by Southbourne and Tangmere. The other options/locations were more challenging in sustainability terms.
- 4.13 The SA of the housing distribution options undertaken at the Issues and Options stage was revised and updated for the Preferred Approach iteration of the SA⁸. This included a specific SA appraisal of each SSL option (section 5 refers), which was revised and updated vis-à-vis the Issues and Options version of the SA.
- 4.14 In the responses received to the consultation undertaken on the Preferred Approach, various key themes can be identified in the comments made regarding the distribution of development, primarily the need to focus development on Chichester city as the main settlement. There was also considerable concern raised regarding additional development on the Manhood Peninsula and concern about the amount of development on the east-west corridor creating a continuous urban form.

⁸ [Sustainability Appraisal for Reg 18 Preferred Approach .pdf \(chichester.gov.uk\)](#)

- 4.15 A large number of objections were received to the parish numbers proposed at that stage. These tended to be local communities expressing concern regarding the amount of housing assigned to their area, raising concerns regarding the relevant constraints, and often suggesting alternative locations, along with site promoters promoting a higher number of housing units and/or inclusion of their site.
- 4.16 In terms of the SSLs, the Land East of Chichester site (AL3) received very limited negative comment (3 objections), and most of the responses regarding this site related to matters of detail. The Southern Gateway (AL5) allocation did receive a moderate number of objections (19). However, the points raised did not relate to the principle of development, as such; rather, they reflected the complicated nature of the site, particularly in relation to transport related issues, but also with respect to the environment and heritage. The proposed allocation at South-West of Chichester (AL6) received a very large number of objections (149). This reflected the wide array of environmental and delivery constraints pertaining to that site. Representations from the promoters of proposed allocations at Land East of Chichester (AL3) and South-West of Chichester (AL6) suggested that the capacity of both sites were capable of being increased, subject to the completion of further technical work.
- 4.17 In terms of other site-specific SSLs, Highgrove Farm, Bosham (AL7) received a considerable number of objections (65) citing concerns regarding a wide range of issues such as impact on education provision and open space, landscape impact and wastewater. At that time there was also an SSL for Selsey at Land North of Park Farm (AL12), which received a limited number of objections (16), citing issues such as impacts on the Pagham Harbour Special Protection Area (SPA) and Brent Geese, along with issues such as flood risk and various infrastructure issues.
- 4.18 With respect to SSLs to be delivered via neighbourhood planning, the largest of these related to Southbourne Parish (AL13), for 1,250 dwellings, which received a moderate number of objections (41), raising issues related to infrastructure and transport, along with landscape and environmental impacts.
- 4.19 East Wittering Parish was assigned 350 dwellings (AL8), and this received a moderate number of objections (30), primarily based on environmental impacts and infrastructure. The council response at that time noted that the parish council had by then decided not to bring forward a neighbourhood plan (which would have delivered the housing requirement for the parish).
- 4.20 Fishbourne Parish was assigned a neighbourhood plan requirement amounting to 250 dwellings (AL9). This received twice as many objections as the housing

assigned to East Wittering Parish, with these objections (61) covering a broad range of issues. The issues raised included the appropriateness of the housing number itself, along with a range of other matters such as environmental, landscape and infrastructure considerations. The response provided by the council noted that further consideration was needed regarding the capacity to accommodate this level of development, particularly with regards to landscape capacity and the proposed strategic wildlife corridor.

- 4.21 Chidham and Hambrook Parish (AL10) was assigned a housing number of 500 units, which received a similar number of objections as was the case with East Wittering (33). Comments received raised similar matters to those referred to above and, as with Fishbourne, the council response concluded that further consideration was needed regarding the capacity to accommodate this level of development, particularly with regards to landscape capacity and proximity to the sensitive environment of the AONB.
- 4.22 Hunston Parish had a proposed housing number of 200 units (AL11), but this received a significant number of objections (120), significantly more than any of the others. A number of transport-related concerns were raised, but a wide range of other matters were also cited in representations, including numerous environmental and landscape factors.

Between Preferred Approach (Reg.18) and Proposed Submission Local Plan (Reg. 19)⁹

- 4.23 The bulk of the principles underpinning the housing distribution appear to be well-established in light of the PA consultation, primarily the focus on Chichester and the east-west corridor. However, some of the SSLs required further consideration, in some cases in terms of whether they were acceptable in principle (AL6), but generally more in terms of whether the scale of development proposed was appropriate. Several other technical issues flowing from the outcomes of the PA consultation also required further investigation, which also had implications for the housing distribution (e.g. transport).
- 4.24 Consequently, during the period between the PA and Regulation 19 consultations a considerable amount of further scenario testing was undertaken based on the SA, additional evidence (particularly in relation to transport issues) and in light of consultation with key technical consultees (such as the County Council and National Highways) and stakeholders (such as parish councils). This sought to respond to issues raised through the PA consultation and explain the council's evolving understanding of the severity and implications of certain

⁹ Please note, some policy numbers change in the Regulation 19 version of the Local Plan.

constraints. The key matters that arose for consideration during this period are summarised as follows:

- Transport impacts and associated infrastructure delivery/upgrades were the subject of further scenario testing, with the scenarios focused on mitigating the transport impacts as effectively as possible, while still meeting the full housing need requirement derived from the Standard Method.
- Housing delivery options were reappraised via a HELAA¹⁰ update. The methodology was revisited in order to ensure that all suitable options for housing delivery were considered. This involved consideration as to whether more brownfield land could be utilised.
- Additional land was promoted in the northern plan area, suggesting that higher housing numbers were potentially deliverable there.
- More consideration was given to the wastewater constraints and associated infrastructure upgrades which would be necessary, and consequently the need to guide development to the least constrained areas. This issue also had implications for the delivery timescales of development.
- The evidence relating to flooding constraints evolved considerably, particularly when accounting for climate change, significantly increasing the level of flood risk in the vicinity of the Manhood Peninsula coastline.
- West Sussex County Council, as the local education authority, advised that the housing development proposed within Hunston and North Mundham parishes could not be served by the existing primary schools in the area and further school capacity would be required to accommodate the extent of housing development proposed.
- In light of advice from the Planning Advisory Service (PAS), it was also necessary to give consideration to the amount of emphasis being placed on neighbourhood plans as a mechanism for delivery of housing. PAS suggested that too much emphasis was being placed on neighbourhood plans at that stage.

4.25 In relation to the SSLs themselves, issues considered during this period included:

- Whether the capacity of the Land East of Chichester site (AL3) could be increased. The site promoters favoured increasing it, but this needed to be balanced against the need to ensure the various site constraints could be addressed successfully, including the relocation of the proposed Strategic Wildlife Corridor (SWC) from its initial position to the east of Drayton Lane to the west, thereby crossing the site and reducing the area of land available for development.

¹⁰ [Housing and economic land availability assessment - Chichester District Council](#)

- The concerns regarding the availability and deliverability of the Land South-West of Chichester (AL6) site also needed to be explored in more detail.
 - Fishbourne Parish (AL9) - there was a need to consider the level of development which could be accommodated within the parish in light of the proposal for a SWC to the east of Fishbourne. Site availability was also a key consideration in this parish, with the available land now markedly reduced.
 - Chidham and Hambrook Parish (AL10) – further consideration was undertaken of the landscape capacity of the parish and the impacts of housing development on the Area of Outstanding Natural Beauty (AONB).
- 4.26 During this period a range of different distribution options were devised based on meeting the full housing requirement derived from the Standard Method. However, further transport modelling was carried out to understand the highway improvements necessary to mitigate the impacts of the proposed growth and the timing of the identified mitigation. The Transport Background Paper (BP14) details the work undertaken and the outcome of that process, but in essence it was determined that it would not be possible to secure the full funding necessary to mitigate adequately the transport effects of the full level of housing development required by the Standard Method.
- 4.27 In light of the identified funding constraints and the lack of certainty regarding the deliverability of the required A27 highway improvements, Full Council resolved to explore an ‘infrastructure constrained’ approach to the level of housing delivery, based on a housing number below the housing requirement derived from the Standard Method. This was discussed with the highway authorities to seek an agreed basis for determining how much development could be accommodated based on a reduced package of infrastructure improvements informed by the viability constraints.
- 4.28 Mindful of the implications of the Local Plan providing less housing than would be derived from the Standard Method, a Planning Inspectorate (PINS) advisory visit was then held in July 2021 to explore the relevant issues in more detail¹¹. This highlighted that before concluding that the housing needs could not be met the council would need to determine three issues:
1. What level of housing could be achieved based on the required improvements to the A27 without undermining viability, and thus deliverability;
 2. Whether the full housing needs could be met in another way, to include taking a step back and reassessing the spatial strategy and distribution of development in other parts of the local plan area; and

¹¹ [Local Plan Update - Appendix 3 - Note of PINS Advisory Visit 12.07.21.pdf \(moderngov.co.uk\)](#)

3. If not, whether housing needs could be met elsewhere through constructive, active and on-going engagement as part of the Duty to Cooperate.
- 4.29 In light of the above, the council revisited the distribution again, this time lowering the amount of development in the southern plan area, in recognition of the highways constraints. However, to seek to get as close as possible to the housing number derived from the Standard Method, the council explored options to increase the amount of housing assigned to the northern plan area. This process was undertaken on the basis of more SA scenario testing and is set out in detail within the SA submitted in support of the Local Plan¹². Further technical work and consultation with technical consultees in relation to key issues such as transport, water neutrality, infrastructure and environmental impacts (particularly air quality) accompanied this process. The testing of the options in the northern plan area involved some very ambitious options, including options which would have met the full housing requirement derived from the Standard Method. However, the council has sought to ensure that the final proposal is sustainable and reasonable.
- 4.30 Another important development was that in April 2022, Southbourne Parish Council decided, following the receipt of the Examiner's Report, to withdraw the Southbourne Parish Neighbourhood Plan Review 2019-2037, which had sought to make provision for the SSL requirement of 1,250 units proposed in the PA. The Examiner had concluded that the neighbourhood plan was not in sufficient conformity with the strategic policies of the adopted Chichester Local Plan at that stage¹³. The parish council subsequently advised of their intention to 'hand back' their housing assignment to the council. This meant that the development would need to come forward via a mechanism other than neighbourhood planning, such as a site-specific allocation.
- 4.31 The situation with respect to Southbourne did not change the assessment of the overall housing distribution, and a full explanation of the situation is set out in the updated Southbourne Broad Location for Development Background Paper (May 2024, BP12). As that background paper explains, the Southbourne requirement was integrated into the Local Plan as a Broad Location for Development (BLD) as opposed to a specific site allocation to ensure that the progression of the Local Plan was not further delayed. The BLD area is shown on the key diagram. A specific allocation for the amount of development specified in policy AL13 is to come forward via a subsequent DPD. BLDs are an option specifically allowed for in the NPPF¹⁴. The council has already initiated work on the Southbourne Allocation Development Plan Document (the

¹² [Sustainability Appraisal - January 2023.pdf \(chichester.gov.uk\)](#)

¹³ [Southbourne Neighbourhood Plan Examiners Report - CLM QC - March 2022](#)

¹⁴ NPPF, para 68 b) refers to 'specific, developable sites or broad locations for growth, for years 6- 10 and where possible, for years 11 – 15 of the plan; [emphasis added]

‘Southbourne Allocation DPD’), which is following along closely behind the Local Plan. This work will support the timely achievement of the latest housing trajectory within the ‘Council’s suggested modifications schedule’ (April 2024, SD10.01). The Southbourne Allocation DPD is being prepared by specialist consultants Tibbalds and will include a site allocation and masterplanning process based on a ‘place-led’ approach. The programme for the Southbourne Allocation DPD is based on it being submitted for examination as soon as the Local Plan is adopted. The programme for the DPD is set out in the council’s LDS¹⁵.

Changes Made in Light of the PA Consultation and Further Technical Work

- 4.32 The main change to the specific site SSLs since the PA is that the South-West of Chichester site (AL6 in the PA) was removed, primarily owing to the lack of available funding for the Stockbridge link road, along with the environmental constraints associated with the site. It was replaced with a newly promoted site, Land at Maudlin Farm (Policy A10 in the Reg.19 version of the Local Plan¹⁶), which is within Westhampnett parish, but next to Chichester city, meaning this allocation allowed for a continuation of the approach of focusing new housing development as close as possible to Chichester city.
- 4.33 The number of units assigned to the Land East of Chichester site (now Policy A8, previously A6 in the PA) has been increased from 600 to 680. Primarily, this is a reflection of some of the housing numbers previously assigned to Hunston and North Mundham needing to be re-assigned in light of the education constraints pertaining to those parishes. This re-distribution also aligns with the position of the site promoters as set out via the PA consultation that the site could take more units than was indicated at that stage. Discussions with the site promoters have been ongoing as the plan has progressed with a view to ensuring that relevant issues are addressed in order that the site progresses effectively following the adoption of the Local Plan.
- 4.34 The number of units assigned to the Southern Gateway area (now policy numbers A3, A4, A5, previously just A5 in the PA) have been reduced as the process has evolved. This is not a reflection of spatial planning considerations, as the use of this area for housing is consistent with the council’s key goal of seeking to focus development on the most sustainable locations and on

¹⁵ The LDS is in the process of being updated (to be considered at Cabinet 15th July 2024 and Full Council 16 July 2024). The latest version will be made available here ([Timetable - Local Development Scheme - Chichester District Council](#)).

¹⁶ Please note, the policy number in the Submission Local Plan have been revised somewhat as part of the process of amending the PA.

brownfield land. Rather, the reductions are necessary in the interests of deliverability, noting that the largely brownfield land is in multiple ownerships and subject to constraints. The council considers that it has now struck the appropriate balance between being ambitious in maximising the opportunities to utilise this highly sustainable area, but also realistic in relation to what is achievable within the plan period based on the current situation. A key issue is that a number of the key land parcels are not currently available for development. Therefore, the site allocation policies now focus on the land where housing is most likely to be delivered, while also supporting the regeneration of the rest of the site in a more flexible manner.

- 4.35 The approach to Selsey has also been revised as the process has evolved. The site proposed for allocation at PA stage was removed as it was established to be at risk of flooding. Replacing it with an alternative allocation in Selsey was considered but was not ultimately taken forward owing to the significant transport and flood risk constraints in that area (SA January 2023 Appendix V refers).
- 4.36 The housing numbers assigned to particular parishes have also been significantly reduced. In particular, the requirement for East Wittering was removed entirely. This reflects the significant constraints in that area, including transport connectivity, but particularly in relation to flood risk, with extensive tidal flood risk (under climate change scenarios) across the area identified within the most recent Strategic Flood Risk Assessment 2023 (SFRA). The extent of the flood risk constraint is disputed by site promoters, and a significant application is currently at appeal at a site known as Stubcroft to the north of East Wittering (22/02214/FULEIA), which is likely to resolve the question of the full extent and effect of the flood risks pertaining to the area. In any event, as is set out below, housing supply in the area has come forward via speculative applications which pre-dated the new SFRA. The SA concludes that, in light of the latest flood risk evidence, the only reasonable scenario for East Wittering involves completions, commitments and windfall only i.e. the SA agrees that allocations in this area should not be considered (SA Jan 23 Appendix V refers).
- 4.37 The housing number for Chidham and Hambrook Parish (now policy A12, previously A10 in the PA) was reduced between the two consultations, from 500 at the PA stage down to 300 by the Reg.19 stage. Nevertheless, this reduced figure has already been exceeded by the number of units consented in that parish via speculative applications.
- 4.38 The housing number for Fishbourne Parish (previously an SSL as per PA Policy AL9) has also been significantly reduced to a non-strategic parish housing figure as identified in Policy H3. This is largely due to the location of the strategic

wildlife corridors now proposed within the Local Plan, combined with a key, relatively large, site no longer being available. The SA also identifies transport connectivity, future urban sprawl and wastewater treatment capacity as constraints to significant growth in the parish (Appendix V refers).

5. Impact of Planning Applications

5.1 Given the length of time which it has taken to progress the Local Plan, combined with not having a 5-year housing land supply for significant periods of that time, the result has been that speculative applications have had a significant impact on how the housing distribution has evolved in a practical sense, particularly in recent years. This is summarised below:

- Land at Highgrove Farm, Bosham: this proposed site allocation now has planning permission (21/00571/FUL), which confirms its position as part of the housing distribution. The permission is for 300 dwellings. This is reflective of the 250 proposed via the SSL within the PA, coupled with a pre-existing allocation for the part of the site not covered by the proposed allocation in the Reg.19 Local Plan (that area was allocated via Policy BO1 of the adopted Site Allocation DPD 2014 - 2029 for 50 dwellings).
- Southbourne: There have been a number of speculative applications granted permission within the BLD area, which has reduced the specific housing allocation figure down from 1,250 at the time of the Preferred Approach Plan, initially to 1,050 in the Reg.19 Local Plan, and now down to a residual figure of 823 as per the latest housing trajectory as set out in Appendix 6 of the 'Council's Suggested Modifications Schedule - Appendices 1-7' – SD10.02).
- Chidham and Hambrook Parish: As has been referred to above, the neighbourhood plan allocation has already been 'met' by speculative applications now permitted. There are currently 374 dwellings within the housing land supply within the parish, which exceeds the 300 allocated to the parish in the Reg.19 Local Plan (Policy A12).
- North Mundham Parish: As has been explained above, the housing requirements assigned to North Mundham and Hunston were reduced and partially re-assigned to Land East of Chichester in the period between the PA and 19 consultations. However, three speculative applications have been permitted in the parish, at Former Lowlands Nursery (20/01686/FUL) for 39 dwellings, Land South of Lowlands (20/02989/FUL) for 66 dwellings and Charmans field (22/02191/OUT) for 94 dwellings. This substantially exceeds the allocation figure in the Reg.19 version of the Local Plan (50 dwellings).
- Birdham Parish: A large speculative application for 150 dwellings has recently been permitted in the parish (ref: 21/01830/OUT). This is obviously a significant change from the distribution within the Reg.19 version of the Local Plan, where

no allocation for housing was made, and is also above the initial figure in PA version of the Plan, which was 125 dwellings.

- Manhood Peninsula coastal area: Within the PA version of the Local Plan there were effectively 600 dwellings allocated to the Manhood Peninsula coastal areas, with 350 assigned to East Wittering and 250 to Selsey. As has been referred to above, both allocations have been removed in the period between PA and Reg.19. However, some housing has still been provided in that area via speculative housing in the neighbouring parishes, with 70 consented in West Wittering and 130 in Earnley. As has been referred to above, a significant application for 280 dwellings in this location is currently at appeal (22/02214/FULEIA).

5.2 This summary illustrates that the housing distribution has remained largely intact in light of speculative applications as the Local Plan process has evolved, though it has been distorted somewhat. The following themes can be drawn from the progression of planning applications during this period:

- The east-west corridor is a key growth area with a significant amount of additional housing already permitted in this area, particularly in the Chidham and Hambrook and Southbourne parishes. However, this inevitably puts a lot of pressure on those areas in terms of infrastructure and hence the need for proper planning of the area is paramount, underlining the purpose of the new Local Plan and the Southbourne Allocation DPD.
- The Manhood Peninsula is a complicated area in planning terms, with consented planning applications distorting the approach envisaged in the Reg.19 version of the Local Plan, but still resulting in less development than set out in the PA. However, overall, this is considered broadly consistent with the overall approach of looking to subtly shift development patterns away from the Manhood Peninsula towards the more sustainable and relatively less constrained east-west corridor.

6. Conclusion

6.1 An iterative approach has been taken to housing distribution during the process of preparing the Local Plan, underpinned throughout by the SA process. The council has responded positively and proactively to the issues raised at the various stages of the process and has been flexible its approach to the various challenges faced.

6.2 The key considerations that underpin the housing distribution are as follows:

- The spatial strategy, particularly the east-west corridor, with Chichester city the key focal point for development along that corridor. This is a continuation of the approach in the adopted Local Plan.
- Sustainability, i.e. focusing development on the most sustainable locations.
- Responding to the significant environmental constraints, most notably the Chichester Harbour Area of Outstanding Natural Beauty (AONB), strategic wildlife corridors, nutrient neutrality, water neutrality (in the northern plan area only), European designated wildlife sites and flood risk.
- Infrastructure, primarily highways and wastewater infrastructure, both of which are significant constraints in the plan area.

6.3 Some of these constraints have a significant impact on the number of sites which are suitable for housing development, while others impact on the amount of housing development which is achievable in particular locations. Some constraints are also more relevant to the timescales within which development can come forward, such as wastewater infrastructure. More information about these issues is set out in the council's evidence base, and clearly the SA plays a key role in explaining how these various constraints have been taken into account as the housing distribution and site selection process has evolved.

6.4 The outcome has been to focus development on sites in and around Chichester city, with other housing generally focused on the east-west corridor. While the settlement hierarchy would indicate that a notable amount of housing should be directed towards the Manhood Peninsula, there are significant transport and environmental constraints in that area which mean that the most sustainable option is to focus more on the east-west corridor.

6.5 Similarly, owing to the transport constraints in the southern plan area, the council has sought to moderately increase the relative housing levels assigned to the northern plan area in order to get as close as possible to the Standard Method housing figure, but in a manner which still ensures that the level of development assigned to that area is sustainable.