

Chichester District Council Local Plan Review Preferred Approach Consultation

Regulation 18 consultation December – February 2019

West Sussex County Council Officer Level Response

Introduction

The Chichester Local Plan Review Preferred Approach sets out how the future development in the District will be shaped, excluding the area within the South Downs National Park, up to 2035. It includes the overall development strategy as well as relevant strategic policies to meet the future needs of the area and development management policies to help guide development over the plan period. The Local Plan helps to:

- choose where the development goes;
- protect the character and beauty of the area;
- provide job and housing opportunities so that children can continue to work and live locally;
- support and help to boost the local economy;
- help residents to maintain healthy and active lifestyles; and,
- make sure that there is adequate services, travel options and community facilities.

The Chichester Local Plan was adopted in July 2015. At that time, the Local Plan was approved, but the Government Inspector said that it had to be reviewed again within five years, to make sure that sufficient housing was planned to meet the needs of the area.

The first part of the review process was carried out in June 2017 with an Issues and Options consultation, in which comments were invited regarding the overall development strategy and possible development locations. The Local Plan Review: Preferred Approach is the second stage of the process. It sets out the proposed development strategy and policies for the area to meet future needs.

West Sussex County Council Officer Level Comments

This note sets out West Sussex County Council's (WSSC) officer response to the consultation on the draft Chichester Local Plan Review Preferred Approach. It highlights key issues and suggested changes to which Chichester District Council (CDC) is requested to give consideration. We will continue to work with CDC in preparation of the Local Plan Review and the Infrastructure Delivery Plan regarding WSSC service requirements in order to mitigate planned development.

Minerals and Waste

A steady and adequate supply of minerals and the achievement of sustainable waste management can help to achieve a District or Borough Council's goals in relation to the economy, housing, transport, communications, strategic infrastructure and the environment. Therefore, District and Borough Local Plans should recognise the importance of minerals and waste issues as relevant to the scope of their overall strategies.

We welcome the reference to the adopted Minerals and Waste Local Plans and safeguarding in the document and the requirements in policies where a site is located within a minerals safeguarding area, or near to a safeguarded waste site. There are some missing references to safeguarding of minerals and waste sites for some of the proposed allocations, set out below and request that these references are added. It is also requested that 'Joint' is added into the references for the Joint Minerals Local Plan through the document.

Policy W23 of the Waste Local Plan applies to all Districts & Boroughs, regarding waste management within development and should be referenced in the Chichester Local Plan Review.

AL3 East of Chichester

The site is to the north of the Fuel Depot site allocation in the Waste Local Plan (Policy W10) for a built waste facility as part of a comprehensive redevelopment of the site (including complimentary non-waste uses). The East of Chichester allocation is the land to the north, bisected by the railway line, of the Fuel Depot. Reference should be made to giving consideration to the allocation, and therefore its safeguarding.

AL4 Westhampnett/North East Chichester

Reference should be made to minerals safeguarding, for consistency with other allocations, as within the sharp sand and gravel safeguarding area.

AL5 Southern Gateway

Reference should be made to the mineral infrastructure safeguarding policy M10 as within 200m of the Chichester Railhead.

AL6 South-West of Chichester

Reference should be made to the mineral infrastructure safeguarding policy M10 as within 300m of the Chichester Railhead.

AL7 Highgrove Farm Bosham

Remove reference to minerals safeguarding as the site is not within the safeguarding or consultation area.

AL12 Park Farm Selsey

Reference should be made to minerals safeguarding as site is within the sharp sand and gravel safeguarding area.

Neighbourhood plan allocations

Sites are yet to be allocated through neighbourhood plans. It is considered that the Joint Minerals Local Plan and Waste Local Plan are referenced, particularly with regards to safeguarding policies (M9, M10 and W2) and these documents and policies are given detailed consideration when allocating sites. Development at, adjacent or proximal to existing waste or mineral sites / infrastructure should be the subject to consultation with WSCC.

Connectivity and Sustainable Travel

The County council has worked with the District Council on the preparation of the transport evidence base study undertaken by Peter Brett Associates for the

District Council. The recommended transport mitigation strategy, as assessed using the Chichester Area Transport Model has been demonstrated to be capable in principle to prevent the development from resulting in severe residual cumulative impacts on the highways and transport network. However, the recommended strategy has several risks to deliverability and acceptability associated with it, which require further work to be undertaken to demonstrate that the strategy can be implemented in its current form to provide the forecasted mitigation to travel conditions.

There are three locations where new highway alignments are proposed outside of existing highways boundaries. Two of these may include significant earthworks or structures to be delivered, being Stockbridge Link Road and Terminus Road diversion. The cost of the mitigation strategy exceeds a figure which could reasonably be supported by the value of the proposed development developer contributions alone, therefore the delivery of the strategy will depend upon securing of external grant funding to top up developer contributions. WSCC will work with the District Council in supporting and or applying for funding, the District Council needing to secure Highways England to support funding applications for A27 improvements. The proposed junction designs for the A27 Stockbridge and Whyke roundabouts include bans to well used right turn movements off the Chichester A27 bypass which result in significant forecast changes to traffic flows on local roads in the south of Chichester and on the Manhood Peninsular.

There is a need to ensure the land outside the highway boundary is available and the plan should set out how this land will be acquired to deliver the measures, it may be that a commitment to use, if required, and therefore reference to CPO be made in the policy.

Funding for the mitigation strategy is uncertain. It is considered that the Plan should set out how it will deal with this uncertainty. This could include trigger points in the monitoring framework to trigger a change of approach or alternative options to deliver the required development.

These factors mean that feasibility work is necessary to be undertaken prior to Plan submission, to reduce as far as practicable risks to costs, land take, impacts and deliverability of the proposed transport strategy in order to show that the strategy can be implemented within the plan period and that the funding strategy will be sufficient to meet the design requirements. In particular the following will need to be addressed:

- Statutory undertakers equipment under the roads junctions to be impacted.
- Extent of earthworks required to create a vertical and horizontal alignment compliant with design standards. Design audit to identify any required departures from standard.
- Designing for drainage and flooding issues, including compliance with the WSCC LLFA Policy for the Management of Surface Water, November 2018.
- Designs for structures to cross watercourses – Stockbridge Link Road
- Design should include suitable provision for rights of way and footway crossings

- Scoping for whether and at what level further Environmental Impact Assessment will be required.
- Stage 1 Road safety Audit, designers response report and resulting amendments to designs.
- Land take required after feasibility level designs have been developed and availability of required land.
- Wophams Lane – impacts of forecast changes to flow patterns to take B2201 southbound traffic on requirements for highway width, alignment, footway provision and junctions with A286 Birdham Road and B2201 Selsey Road; design solution required.
- Quarry Lane, Kingsham Avenue /Road, Terminus Road; impacts of forecast flow changes on highway users, residential and commercial frontagers and measures to manage through traffic whilst maintaining local access

Sustainable transport measures will also be required to mitigate planned development. These will be identified through more detailed assessments of sites including pre-application consideration. Funding will need to be identified through development and other sources as well in some cases.

Public Rights of Way

There is support for the Local Plan Review's approach to Public Rights Of Way (PROW), not just for the potential to impact on existing public off-road access but also the opportunity it brings to enhance this access for the benefit of future residents, communities and visitors. PROW deliver benefits for personal health and wellbeing; sustainable transport; reduction of air pollution and road congestion; are able to support local economies; and they connect communities. WSCC PROW welcomes several aspects of the Vision statement, which give support to the protection and enhancement of the PROW network, and provision of safe and convenient off-road access opportunities for residents and visitors:

- Pursue a healthy lifestyle and benefit from a sense of well-being supported by good access to education, health, leisure, open space and nature, sports and other essential facilities;
- Live in sustainable neighbourhoods supported by necessary infrastructure and facilities;
- Move around safely and conveniently with opportunities to choose alternatives to car travel.

The Local Plan Strategic Objectives offer further support to enhance off-road access, particularly to 'Encourage healthy and active lifestyles for all, developing accessible health and leisure facilities and linked green spaces'. However, the objective to 'Achieve a sustainable and integrated transport system through improved cycling networks and links to public transport' should recognise walking also as an important mode for many people; some strategic enhancements will significantly improve walkers' safety and convenience.

It is considered that West of Chichester the A259 could act as a corridor for increased volumes of non-motorised access, particularly cycling. Improvement of the existing on-road facility and development of a various 'feeder' routes to connect with the many settlements, perhaps using quiet lanes in places, would encourage cycling particularly to be a natural alternative to vehicle use. Policy

S18: Integrated Coastal Zone Management for the Manhood Peninsula, gives regard to such an ambition in stating it will 'Improve infrastructure to support sustainable modes of transport, especially cycle ways, bridleways and footpaths, including the National Coastal Footpath'.

The National Planning Policy Framework (NPPF) Open Space and Recreation, para 97b) states:

the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

The NPPF para 98 also states:

Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.'

There is support for Policy S20: Design, that recognises these requirements in stating development 'is well connected to provide safe and convenient ease of movement by all users, prioritising pedestrian and cycle movements both within the scheme and neighbouring areas and ensuring that the needs of vehicular traffic does not dominate at the expense of other modes of transport, or undermine the resulting quality of places' and 'incorporates and/or links to high quality Green Infrastructure and landscaping to enhance biodiversity and meet recreational needs, including public rights of way'.

Education

As the local education authority, WSCC has the statutory duty to ensure that there is a sufficient supply of suitable school places to meet statutory requirements for early years, primary, secondary and sixth form provision (including up to age 25 for those with special educational needs and/or disabilities). Education infrastructure, or contributions to provide infrastructure, will be required in order to mitigate proposed development. We will continue to work with CDC in preparation of the Local Plan Review and the Infrastructure Delivery Plan regarding education and other service requirements in order to mitigate planned development.

The table below sets out the primary, secondary school and sixth form requirements to mitigate proposed development.

Strategic Site Allocations	Proposed housing numbers (subject to change)
AL1 Land West of Chichester It should be noted that phase one of this development will provide	1,600 up to 1250 within the current

<p>the primary school with the core of the building being built to the specification for a 2 form entry (FE) school and 1FE teaching accommodation. Phase 2 as per 6.10 on page 93 should include expansion of the primary school for the further 1FE of teaching accommodation.</p>	<p>local plan period and a further 350 post 2029.</p>
<p>AL2 Land at Shopwhyke (Oving Parish)</p> <p>No update to original response for this allocation is required.</p>	<p>585</p>
<p>AL3 Land East of Chichester – previously South of Shopwhyke</p> <p>At the current time pupil place planning indicates that there is insufficient space within the primary schools that serve this proposed development. Further capacity would be required to accommodate the development. Land for a 1 FE expandable to 2FE and pro rata share of the build costs would be required.</p> <p>If numbers were to increase on the east side of the city, education provision will need to be reviewed, potentially a further 1FE may be required including land provision, this could be in the form of an expansion or a new school being built capable of expansion to 3FE.</p> <p>At the current time pupil place planning indicates that there would be expansion capacity to accommodate the child product from this proposed development for secondary aged pupils. Contributions would be required for expansion of secondary schools if feasible and required.</p> <p>At the current time pupil place planning indicates that there would be expansion capacity to accommodate the child product from this proposed development for sixth form pupils. Contributions would be required for expansion of the provision if feasible and required.</p>	<p>600</p>
<p>AL4 Land at Westhampnett / North East Chichester</p> <p>The remaining 200 dwellings will impact on the education provision in the area, financial contributions towards expansion of existing or pro rata costs towards the expansion of the school within AL3.</p> <p>At the current time pupil place planning indicates that there would be expansion capacity to accommodate the child product from this proposed development for secondary aged pupils. Contributions would be required for expansion of secondary schools if feasible and required.</p> <p>At the current time pupil place planning indicates that there would be expansion capacity to accommodate the child product from this proposed development for sixth form pupils. Contributions would</p>	<p>500 , 300 granted permission in June 2016</p>

<p>be required for expansion of the provision if feasible and required.</p>	
<p>AL5 Southern Gateway</p> <p>At the current time pupil place planning indicates that there would be sufficient space or expansion capacity to accommodate the child product from the strategic allocation of 350 dwellings in the Southern Gateway. However, consideration should be given to the cumulative impact of housing in the area Land South West of Chichester (AL6) to allocate land within the area for a 1FE expandable to 2FE primary school. Pro rata financial contributions towards the build costs would be sought from developers to mitigate their impact.</p> <p>At the current time pupil place planning indicates that there would be expansion capacity to accommodate the child product from this proposed development for secondary aged pupils. Contributions would be required for expansion of secondary schools if feasible and required.</p> <p>At the current time pupil place planning indicates that there would be expansion capacity to accommodate the child product from this proposed development for sixth form pupils. Contributions would be required for expansion of the provision if feasible and required.</p>	<p>350</p>
<p>AL6 Land South West of Chichester (Apuldram & Donnington Parishes)</p> <p>It should be noted that the primary education provision in this area is either in Chichester City Centre which means crossing the main A27 or by travelling south towards the peninsula. Consideration should be given to the cumulative impact of further housing in the area along with the Southern Gateway allocation (AL5) to allocate land within the strategic allocation site for a 1FE expandable to 2FE primary school. Pro rata financial contributions towards the build costs would be sought from developers to mitigate their impact.</p> <p>At the current time pupil place planning indicates that there would be expansion capacity to accommodate the child product from this proposed development for secondary aged pupils. Contributions would be required for expansion of secondary schools if feasible and required.</p> <p>At the current time pupil place planning indicates that there would be expansion capacity to accommodate the child product from this proposed development for sixth form pupils. Contributions would be required for expansion of the provision if feasible and required.</p>	<p>Min. 100</p>
<p>AL7 Bosham</p>	<p>250</p>

<p>The current primary provision serving the area is at capacity, expansion of the school on its existing site is not possible. As part of the strategic allocation, it is proposed that land for a 2FE primary school be provided. The strategic allocation of 250 dwellings in isolation does not require a new school to be built. Certainty over the land allocation and sufficient funding will be key drivers in realising this proposal.</p> <p>AL7, AL10 and AL13 are all within the same school planning area, the cumulative total of the strategic allocations brings forward a requirement for c3 forms of entry additional school places. The Local Plan, as currently drafted, indicates an oversupply of school places which could affect the viability of all the schools in the planning area.</p> <p>Expansion of the secondary school may be possible. Contributions would be required for expansion of secondary schools if feasible and required.</p>	
<p>AL9 Fishbourne</p> <p>The primary school serving the area is currently at capacity, expansion of the school may be possible, feasibility / options appraisals would need to be undertaken.</p> <p>At the current time pupil place planning indicates that there would be sufficient space or expansion capacity to accommodate the child product from this proposed development for secondary aged pupils. Contributions would be required for expansion of primary and secondary schools and sixth form if feasible and required.</p>	250
<p>AL8 East Wittering</p> <p>At the current time pupil place planning indicates that there would be sufficient space or expansion capacity to accommodate the child product from this proposed development.</p> <p>Contributions would be required for expansion of primary and secondary schools if feasible and required.</p>	350
<p>AL10 Chidham and Hambrook area</p> <p>The current primary provision serving the area is at capacity, expansion of the school on its existing site is not possible. As part of the strategic allocation, it is proposed that land for a 2FE primary school be provided. Certainty over the land allocation and sufficient funding will be key drivers in realising this proposal.</p> <p>AL7, AL10 and AL13 are all within the same school planning area, the cumulative total of the strategic allocations brings forward a requirement for c3 forms of entry additional school places. The</p>	500

<p>Local Plan, as currently drafted, indicates an oversupply of school places which could affect the viability of all the schools in the planning area.</p> <p>Expansion of the secondary school may be possible. Contributions would be required for expansion of secondary schools if feasible and required.</p>	
<p>AL11 Hunston</p> <p>Any development within this area cannot currently be accommodated in the existing primary school at North Mundham. Further capacity would be required to accommodate the development, CDC will need to work with WSCC to determine how additional capacity in the area could be accommodated if land is to be allocated.</p> <p>At the current time pupil place planning indicates that there would be sufficient space or expansion capacity to accommodate the child product from this proposed development for secondary aged pupils. Contributions would be required for expansion of secondary schools and sixth form if feasible and required.</p>	200
<p>AL12 Selsey</p> <p>Further capacity would be required to accommodate the development. Contributions (and possibly land if required) would be sought to meet the pupil product from the development in the most appropriate form once this can be clarified.</p> <p>At the current time pupil place planning indicates that there would be sufficient space to accommodate the child product from this proposed development for secondary aged pupils. Contributions would be required for expansion of secondary schools if feasible and required.</p>	250
<p>AL13 Southbourne</p> <p>At the current time pupil place planning indicates that there is insufficient space within the primary schools that serve this proposed development. Further capacity would be required to accommodate the development. Land for a 2form entry expandable to 3FE primary school and pro rata share of the build costs would be required.</p> <p>AL7, AL10 and AL13 are all within the same school planning area, the cumulative total of the strategic allocations brings forward a requirement for c3 forms of entry additional school places. The Local Plan, as currently drafted, indicates an oversupply of school places which could affect the viability of all the schools in the planning area.</p>	1,250

Expansion of the secondary school may be possible. Contributions would be required for expansion of secondary schools if feasible and required.	
AL14 Tangmere The current allocation of 1,300 dwellings will bring forward the requirement for land for a 1FE expandable to 2FE and financial contributions would be sought to meet the pupil product from the development in the most appropriate form once this can be clarified. At the current time pupil place planning indicates that there would be sufficient space or expansion capacity to accommodate the child product from this proposed development for secondary aged pupils. Contributions would be required for expansion of secondary schools and sixth form if feasible and required.	1,300
Total	4,350

Footnote: - if all of the proposed sites were to come forward the secondary school and sixth form provision would be full in the Chichester Planning Area. Expansion of the secondary schools in the Chichester Planning Area to cater for the increased demand would need to be sought from the academy sponsors, where appropriate and the Local Authority.

Lead Local Flood Authority

The Lead Local Flood Authority (LLFA) is concerned about the approach being taken with regard to ensuring potential wastewater treatment for proposed new sustainable development.

Paragraph 8 of the NPPF states:

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) An economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

Paragraph 20 of the NPPF states:

20. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

In the LLFAs view, the Local Plan Review is not setting out an overall strategy for the pattern, scale and quality of development in relation to arrangements for wastewater management. The LLFA considers that CDC needs to go further in incorporating within the Local Plan Review how this provision is being made.

Additional Policy Comments

Policy S12: Infrastructure Provision

Support the requirement that all development must provide or fund new infrastructure, facilities and services required, both on and off-site (including full fibre communications infrastructure) as a consequence of the proposal. The explicit reference to full fibre communications infrastructure is supported as this will provide gigabit-capable and future-proofed services to all development, existing and new. The reference to provision of facilities and services on and off-site is also supported as in the case of broadband for example, all development will be adequately equipped with the necessary infrastructure installed for the purposes of connecting to full fibre gigabit-capable broadband services. This policy supports the County Council's aim for increased digital infrastructure that will provide for gigabit-capable broadband and future technologies such as 5G.

Support the reference to safeguarding educational facilities under section 3 of the policy.

The policy includes the requirement to 'Facilitate accessibility to facilities and services by a range of transport modes'. PROW can offer vital access means for walkers and cyclists, such as for employment land use (e.g. commuting by bicycle) and in support of the high street, both for employees and customers. It is considered that this Policy, also Policy S13: Chichester City Development Principles, should aim to encourage such access to be the natural and preferred modes of access, thereby helping achieve the benefits previously described. It is noted Policy S14: Chichester City Transport Strategy, does acknowledge cycling and walking and lends support to their improvement.

The supporting text, paragraph 4.81 makes reference to the Strategic Infrastructure Package (SIP). It is requested that this wording is removed and replaced with West Sussex County Council identifies service infrastructure requirements necessary to support new and existing communities, where strategic development and growth is proposed in Local Plans. These are required to deliver the County Council's statutory responsibilities, strategic objectives and current policy and feed into the preparation of the Infrastructure Delivery Plan.

Policy S13: Chichester City Development Principles

This policy, like policy S12, it is considered should aim to encourage such access to be the natural and preferred modes of access, thereby helping achieve the benefits previously described. It is noted Policy S14: Chichester City Transport Strategy, does acknowledge cycling and walking and lends support to their improvement.

Policy S23: Transport and Accessibility

The policy and supporting text paragraphs 5.15 – 5.33 refer to Transport Infrastructure. Understandably much consideration is given to the A27 around Chichester; however, in addition to seeking new infrastructure from new development, it is recommended support in principle is given to maximising the value of existing infrastructure so as to facilitate off-road user modes accessing either side of the A27.

S24: Countryside

Supporting text paragraphs 5.34 – 5.43, acknowledges 'it is necessary to provide for the social and economic needs of small rural communities, and enable those who manage, live and work in the countryside to continue to do so'. It is recognised in para 7.205, supporting text to policy SM35 Equestrian Development, the high numbers of liveried and stabled horses. A considerable network of businesses are supported by such a high equine population, and in addition to financial value within the local community there is considerable benefit in terms of health and wellbeing of individuals. It is suggested that Policy S24: Countryside, could recognise this specifically.

S27: Flood Risk Management

Supporting text paragraph 5.54, requested amendments underlined - as a consequence of the rise in sea levels and storm surges, parts of the plan area will be at increased risk from coastal erosion, groundwater, fluvial and/or tidal flooding. Hard defences may not be possible to maintain in the long term, therefore development needs to be strongly restricted in areas at risk to flooding and erosion, whilst ensuring that existing towns and villages are protected by sustainable means that make space for water in suitable areas. Development must take account of the policies of the relevant shoreline management plan

Supporting text paragraph 5.58, requested amendments underlined - Built development can lead to increased surface water run-off; therefore new development is encouraged to incorporate mitigation techniques in its design, such as permeable surfaces and Sustainable Drainage Systems (SuDS). Where appropriate, SuDS should be used as part of the linked green infrastructure network to provide multiple functions and benefits to landscape quality, recreation and biodiversity. This can be achieved through habitat creation, new open spaces and good design. SuDS should be designed to help cope with intense rainfall events and to overcome any deterioration in water quality status. In determining the suitability of SuDS for individual development sites, developers should refer to guidance published by the Lead Local Flood Authority (LLFA): West Sussex LLFA Policy for the Management of Surface Water: https://www.westsussex.gov.uk/media/12230/ws_llfa_policy_for_management_of_surface_water.pdf and, if necessary, seek further advice from the Lead Local Flood Authority LLFA.

S27 policy text requested amendments underlined for section 1 - a. through a sequential approach, taking into consideration all forms of flooding, it is located in the lowest appropriate flood risk location in accordance with the NPPF and the Chichester Strategic Flood Risk Assessment (SFRA); and

S27 policy text requested amendments underlined for section 2. Sustainable drainage systems (SuDS) will be required on major developments (10 or more dwellings or equivalent) and encouraged for smaller schemes. SuDS should be designed into the landscape of all new development and should be included as part of a District wide approach to improve water quality and provide flood mitigation. A site-specific Flood Risk Assessment will be required for sites within or adjacent to areas at risk of surface water flooding as identified in the SFRA. There should be no increase in either the volume or rate of surface water runoff leaving the site.

S27 policy text requested additional bullet point as number 4 - Clear management arrangements and funding for their ongoing maintenance over the lifetime of the development should be proposed. Planning conditions and / or obligations will be used to secure these arrangements.

S27 policy text requested amendments underlined for section 2, but would be section 5 - Development should not result in any property or highway, on or off site, being at greater risk of flooding ~~than the 1 in 100 year storm return period,~~ including an allowance for climate change.

Policy S29: Green Infrastructure

The Green Infrastructure policy is welcomed, including provision of new Green Infrastructure as an integral part of the development at Strategic Development Locations. It is recommended that measures are put in place to secure the long term management of such Green Infrastructure.

Policy S30: Strategic Wildlife Corridors

The identification of Strategic Wildlife Corridors and inclusion of a policy to safeguard them from development is welcomed. It is recommended that CDC promotes positive conservation management within these corridors to maximise their contribution to maintaining and enhancing biodiversity. As stated in Section 5.66, 'These corridors do not stop at the plan area boundaries.' Thus, it is recommended that CDC works in partnership with Chichester Harbour Conservancy and The South Downs National Park Authority to ensure that these Strategic Wildlife Corridors continue to provide effective corridors and connectivity across the wider landscape.

Section 5.66 refers to four Strategic Wildlife Corridors connecting Chichester Harbour with the South Downs National Park but it is noted that there is no mention of the Strategic Wildlife Corridors to the east of Chichester which connect Pagham Harbour with the South Downs National Park (as seen in Policy Map S30b). It is also noted that the maps referred to in Section 5.66, Maps 5.1 & 5.2 are missing.

WSCC and CDC promoted a Mitigated Northern Route for the A27 at Chichester as the preferred option, subject to the inclusion of important mitigation measures that are needed to make the scheme acceptable in environmental terms and the 'full southern route' as a reasonable alternative. Both routes could impact on the identified Strategic Wildlife Corridors. As currently drafted, Policy

S30 would seem to prevent a mitigated northern route from coming forward in the future. Therefore, the District Council should consider whether the policy is overly restrictive (for example should it refer to 'significant adverse impacts' or 'unacceptable adverse impacts?') and how it would be applied if a northern route for A27 were to come forward in the future.

Policy S31: Wastewater Management and Water Quality

S27 policy text requested amendments underlined for section 3, this - Where appropriate, development should contribute to the delivery of identified actions to deliver infiltration reduction across the catchment. Where appropriate development should contribute to the delivery of identified actions to deliver a reduction in the level of infiltration of groundwater into the sewer system.

Policy AL1: Land West of Chichester

AL1 policy text requested additional bullet point as number 8 - Increase capacity to attenuate surface water on site, thereby reducing the discharge flows off the site below current rates and reducing the risk of flooding to residential areas downstream.

AL1 policy text requested additional bullet point under 15 as 15 b- Provide mitigation for any loss of watercourse habitat resulting from culverting for highway provision in the development;

AL1 policy text in supporting 'improved cycle and pedestrian routes linking the site with the city, Fishbourne and the South Downs National Park', a new key link for cycling will be to Salthill Road, thereby enabling cyclists to benefit from the existing bridge crossing of the A27 for journeys to and from the west.

AL2: Land at Shopwyke (Oving Parish)

The policy acknowledges need 'for foot/cycle bridge across A27 to Coach Road'. There is also need for equestrian users to cross the A27 and WSCC PROW has received several enquiries seeking support for such infrastructure. Consideration could be given to the proposed bridge providing for all three modes.

AL3: East of Chichester (Oving Parish)

AL3 supporting text requested amendments underlined for paragraph 6.22 - The site is identified for 600 dwellings, however, there may be potential to deliver a large strategic development of 1000 dwellings, subject to further evidence, including the testing of additional growth on the local highway network and capacity of the site to provide flood risk attenuation for the increased housing density. The site should be master planned as a whole, and delivered through a phased development over a ten year period. Although the site is physically separated from the city by the A27 Chichester Bypass, the development should form a planned extension to the city, forming a new neighbourhood. This will involve opportunities to provide new facilities to serve the wider local community with good off-site access, particularly by walking and cycling to existing local facilities and facilities in the city.

AL3 policy requires exploring integrated green infrastructure with other strategic sites to the north east of the city, Tangmere and the wider countryside. It is considered that future residents will have expectations for provision of safe and convenient links towards Oving and also across the railway to link to the A259 cycle path and PROW south of the A259. It is considered that the policy should be strengthened to ensure such provision.

Policy AL4: Land at Westhampnett/North East Chichester

AL4 policy text requested amendments underlined for section 3 - Open space and green infrastructure, including a linear greenspace with public access along the Lavant Valley.

Taking into account the site-specific requirements, proposals for the site should satisfy the following requirements:

Policy AL4 policy, it is welcomed that 'provision should be made for green links to the South Downs National Park and Chichester City.' Safe and convenient walking and cycling to Lavant, from where people will access the South Downs, will provide for sustainable transport use.

Policy AL5 Southern Gateway

AL5 supporting text requested amendments underlined for paragraph 6.38 - The area has been identified as suitable for comprehensive regeneration with the aim being to make it a more attractive and welcoming gateway for the city, providing new housing, business and retail space and leisure and tourism facilities. Opportunities will be identified to improve transport links with a focus on cycling, walking and public transport and the removal of non-essential traffic from the area. There is also scope for significant public space enhancements and new landscaping incorporating blue / green infrastructure delivering multi-functional benefits.

AL5 policy text requested amendments underlined for section 5 - Provision of open space that:

- Is in accordance with Policy DM34, including retention of the existing playing pitch unless suitable re-provision is provided;
- Reinforces / enhances green and blue infrastructure consistent with Policy S29 and fully exploits the opportunities for sustainable drainage.

AL5 policy text requested amendments underlined for section 8 - Provision of both a surface and waste water management plan which demonstrates no net increase in flow to Apuldram Waste Water Treatment Works would result from this development, unless suitable alternative provision is agreed;

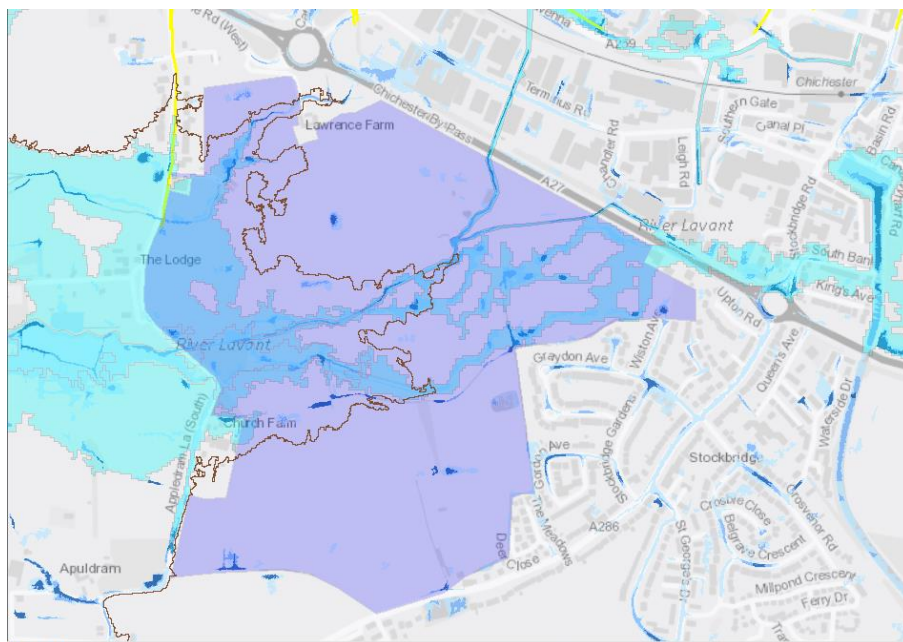
Policy AL6: Land South-West of Chichester (Apuldram and Donnington Parishes)



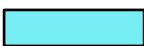

The LLFA has concerns regarding the lack of reference to flood risk constraints of the site in Policy AL6. There is reference to flood risk in paragraph 6.47. However, the policy itself makes no reference to these constraints. The constraints arise from a combination of the following:

- Current tidal /fluvial flood risk extending from Chichester harbour to the west and up the River Lavant floodplain; (Map 1)
- Future tidal /fluvial flood risk associated with climate change; (Map 1)
- Constraints on infiltration of surface water run off because of high seasonal groundwater levels (<0.025m below the surface) (Map 2); and
- Constraints on gravity outfalls because of the low relief and long-term reduction in tidal window for discharge.

The above limits the options for how the site can be effectively drained without a step change from typically employed methods to embrace more innovative and currently expensive options e.g. blue roofs and rainwater harvesting.

The LLFA recommends that the policy sets out both the above constraints and the type of innovative drainage that will be required to achieve the development objectives for the site.

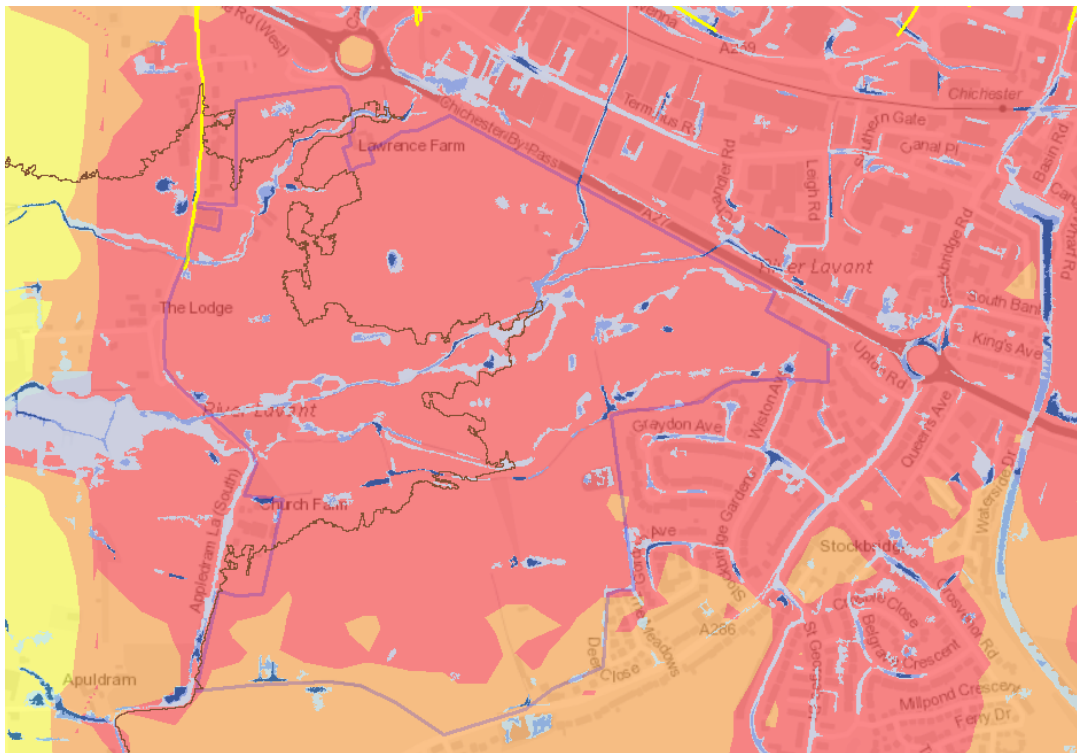


- Key:
-  Projected medium projection extent of SLR based upon 4m contour
 -  AL6 extent
 -  Current Flood Zone 3 extent.
 -  Current Areas of high (1:30) surface water flood risk

Map 1 Existing and projected Tidal and surface water flood risk for AL6.

Consistent with paragraph 3.2 of the SFRA, given the high risk of flooding both now and into the future for this site, it is recommended that CDC gives

consideration to the climate change maps to understand how the flood zones are predicted to change over the lifetime of the development.



Key:



AL6 boundary.



Groundwater levels are either at very near (within 0.025m of) the ground surface.



Groundwater levels are between 0.025m and 0.5m below the ground surface

Map 2 Groundwater flood risk JBA

Policy AL6 WSCC PROW considers 'necessary highway improvements to adequately mitigate the likely impacts on the highway network' to include a bridge crossing of the A27 for convenient walking and cycling access to the Terminus Road industrial estate and the city. There is an existing public footpath but, as this crosses the A27 at-grade, this will not provide the safest facility and not encourage people to minimise use of vehicles for local access. Provision of a bridge and access through the site could also establish a valuable link to the popular Salterns Way walking and cycle path. An additional link to Salterns Way should also be provided off the A286 for the benefit of Stockbridge residents as a safer alternative to the A286.

AL 7 Highgrove Farm, Bosham

The LLFA notes that the above site has the potential for a moderate risk of groundwater flooding. It is likely that this is perched groundwater draining from higher ground / springs to the north that lies in the superficial mixed sediments underlain by Lambeth Clay.

Policy AL8: East Wittering Parish

Due to no information on where housing is going to be located so the LLFA is not in a position to comment on proposed housing allocation sites at this stage.

The policy requires 'Opportunities ... for the expansion and provision of green infrastructure into the wider countryside including between settlements and facilities'. Existing and future residents and the local visitor economy would benefit by delivery of an off-road route for walkers, cyclists and horse riders to and from the Medmerry development and towards Selsey. It is considered that Policy AL8 should aim to deliver this enhancement specifically.

Policy AL9: Fishbourne Parish

Due to no information on where housing is going to be located so the LLFA is not in a position to comment on proposed housing allocation sites at this stage.

It is considered that off-road cycling links to land West of Chichester (off Salthill Road) and to Bosham (off Park Lane) would benefit this community with enhanced sustainable connectivity.

Policy AL10: Chidham and Hambrook Parish

Due to no information on where housing is going to be located so the LLFA is not in a position to comment on proposed housing allocation sites at this stage.

The policy requires 'opportunities' to develop green infrastructure and links to other communities. An opportunity, in conjunction with Highways England, exists to maximise the value of existing infrastructure by creating a new bridleway (for walkers, cyclists and horse riders) on a path using an existing A27 overbridge.

Policy AL11: Hunston Parish

Due to no information on where housing is going to be located so the LLFA is not in a position to comment on proposed housing allocation sites at this stage.

The village is already well connected for walkers to access the surrounding countryside but there are presently no local cycling or horse riding facilities on the PROW network. A bridleway link to South Mundham (with the potential for future cycle links to Pagham and towards Bognor Regis) and to Sidlesham via the golf course and Brimfast Lane would provide residents and visitors with improved access to the countryside and services.

Policy AL12: Land North of Park Farm, Selsey

It is unclear why the policy map shows the proposed strategic allocation lies outside of the Neighbourhood Plan proposed settlement boundary. Some explanation for this anomaly would be helpful in the text.



Groundwater flood risk as depicted by JBA mapping (Brown = seasonal groundwater level lies between 0.025 and 0.5m below the surface).

The principle concern that the LLFA wishes to highlight is the need to ensure that the necessary foul sewerage infrastructure to support development is in place. It is the LLFA understanding that the Siddlesham WWTW experiences capacity issues currently, in part exacerbated by groundwater infiltration. While Policy AL12 states: *Development proposals will need to demonstrate that sufficient capacity will be available within the sewer network, including waste water treatment works, to accommodate the proposed development in accordance with Policy S31.*

The policy proposes only to provide 'pedestrian links between the site and new development south of Park Lane'. It is considered that cycling links should also be provided.

Policy DM8: Transport, Accessibility and Parking

The PROW network can provide vital means for communities to interact and encourage sustainable local access. The policy requirement to create 'links between new development and existing pedestrian, cycle and public transport networks' is welcomed. However, establishing links into surrounding existing development should not be overlooked also – the greater the permeability, the greater the use.

Policy DM10: New Employment Sites

Whilst mentioned earlier in the Plan in respect of a number of specific sites, this policy should specifically aim to provide, as a matter of course, suitable walking and cycling infrastructure to encourage local sustainable access. This infrastructure may need to extend outside a site boundary so as to provide safe

and convenient connection to existing infrastructure. This principle should apply also to Policy **DM13: Built Tourist and Leisure Development** and Policy **DM14: Caravan and Camping Sites**.

Policy DM32: Green Infrastructure

Whilst it is recognised the policy proposes support subject to not 'dissect[ing] ... the linear network of cycle ways, public rights of way, bridleways ...', the policy could lend support to establishing new routes as part of the Green Infrastructure network itself.

Policy DM35: Equestrian Development

It is appreciated why the Plan would wish to require future equine development to be 'well related to or has improved links to the existing bridleway network'. However, this will add to the pressure of use on the existing bridleway network, which is not extensive outside of the South Downs, so will increase degradation of paths. Future developments must, therefore, accept to contribute in some way, acceptable to the local highway authority, to mitigate the additional impact to be created so all lawful users are not disadvantaged.

Policy DM29: Biodiversity

The measures to safeguard and enhance the biodiversity value of development sites are welcomed, including seeking net biodiversity gain.

Schedule of proposed changes to the policies map

S30a West of City Corridors –suggest title should be West of City Strategic Wildlife Corridors (to match S30b: East of City Strategic Wildlife Corridors. The Strategic Wildlife Corridors are depicted in different colour patterns on the two plans which is somewhat confusing.

Strategic Wildlife Corridors Local Plan Review Background Paper Proposed Hermitage to Westbourne Strategic Wildlife Corridor

A large area depicted as Biodiversity Opportunity Area (BOA) in Fig. 1 (immediately to the south of the Rivers Ems & Meadows Local Wildlife Site, Westbourne) is in fact housing and forms part of the settlement of Westbourne. You should consider if this land should be included as having potential for biodiversity enhancement.

Glossary

Includes Sites of Nature Conservation Importance (SNCIs) but not Local Wildlife Sites (LWSs). SNCIs are now known as LWSs.