

## **Chichester Local Plan: Main Modifications Consultation**

### **West Sussex County Council Officers Response – May 2025**

As part of the Local Plan Main Modification Consultation, officers at West Sussex County Council make the following representations:

#### **General Comments on Minerals and Waste wording**

**Para. 1.31 of the Local Plan:** In WSCC Regulation 19 ‘informal comments’, CDC were asked to update the reference to the Mineral and Waste Safeguarding Guidance (currently referred to as ‘Minerals Consultation Area guidance’) which has not been made. For accuracy this should be amended and included throughout the Plan where relevant.

#### **New Policy (NExx) for The Mens SAC and Air Quality**

**MM14:** This policy includes provisions for using “Automatic Number Plate Recognition (ANPR) monitoring on the A272 to determine the uptake of ultra-low emission vehicles (ULEVs) over time” to warn against possible adverse effects “in relation to atmospheric pollution specifically the levels of ammonia”. The text refers in three places to “petrol and hybrid vehicles” or “petrol and hybrid cars and vans”. This seems to exclude diesel vehicles which can also contribute to production of emissions containing ammonia as modern catalytic converters for diesel engines produce ammonia as by product of reducing NOX. On this basis the county council suggests that references to “petrol” should be replaced by “ICE” (Internal Combustion Engine) so that emissions from diesel and petrol vehicles are considered together.

#### **Policy A8 Land East of Chichester**

**MM73 –** Para 10.35 2nd bullet reference refers to a requirement for land for a two-form entry primary school – this is not in line with the 3<sup>rd</sup> bullet point of the policy which also states the requirement for ‘early years/childcare and special educational needs and disability’. ‘Early years/childcare and special educational needs and disability’ should also be added to the text in the supporting text of the policy regarding land requirements.

Criterion 12. There has been no evidence of a requirement and feasibility work undertaken to determine what is achievable in terms of walking and cycling improvements as set out in Policy A8 Criterion 12. However, WSCC are supportive of improved active travel including walking and cycling links from Oving and Tangmere to Chichester. To allow flexibility through master planning of the site and viable and deliverable options of infrastructure we suggest the modification is amended to read

**12. Provide for improved sustainable travel options and new or improved cycle and pedestrian facilities (that could include public rights of way) to provide linkages with Chichester, Westhampnett, Tangmere and Oving, subject to feasibility**

#### **Policy A20 Land South of Bognor Road**

**MM83 – Criterion 12** - reference has been removed which refers to considering the safeguarding of minerals against Policy M9 of the West Sussex Joint Minerals Local Plan (or updated version). WSCC require this to be retained and considered as part of a planning application as it is an area of sharp sand and gravel.

#### **Policy A21 Land East of Rolls-Royce**

**MM84 – Criterion 8** - The wording relating to Minerals and Waste Safeguarding Guidance is not consistent with other parts of the plan and only refers to the Guidance rather than the minerals safeguarding policy. Amendments should be made to refer to policy, as elsewhere in the plan.

#### **Appendix F: Monitoring Framework**

**MM86:** Chapter 8 Transport and accessibility - Policies: T1 and T2

The proposed amendment to the “Monitoring Indicators” column: “Travel patterns across Local Plan area/ forecasts of future transport needs” is vague while the reference to forecasting will require using consultants at some expense to update forecasts regularly through the Plan period. The county council suggests that indicators can be taken or adapted from those already used in the county council’s West Sussex Transport Plan (WSTP) Annual Monitoring Report which includes traffic and cycle count cordons in Chichester. Some further datasets which the WSTP considers at a county-wide level are also available at Chichester District Level. This includes the Sport England active lives survey, which sits alongside active travel in monitoring how many people integrate regular exercise into their weekly routine, although it covers a wider range of physical activity. Use of already existing indicators for which data is available could help to reduce the extent to which the district council may need to commission its own questionnaire surveys into residents’ regular travel choices.