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Chichester Local Plan Examination statement

Matter 2: Vision, Objectives and the Overall Strategy

September 2014

Chichester Local Plan Examination statement

Matter 2: Vision, Objectives and the Overall Strategy

This statement has been produced as part of the examination of the Chichester Local Plan. It answers the Inspector's questions relating to matter 2.

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1. Do the vision and objectives address the key issues for the area?

- 1.1. Yes, section 3 of the Local Plan: Key Policies Pre-Submission (CD-01) sets out the Council's vision and spatial planning objectives for the Plan area. The Council believes that the vision and objectives address the key issues for the area, balancing sometimes conflicting consultation responses but also the conclusions of the Sustainable Community Strategy.
- 1.2. The vision set out the place specific features that the Council envisages can characterise the Plan area by the end point of the Plan in 2029. It is acknowledged that the vision should be both aspirational but based upon achievable aims. The vision is therefore about what the Council wants to achieve, and how the different places within the Plan area should be shaped.
- 1.3. The vision clearly addresses the key issues facing the area; it aspires to put residents' needs at the centre of the Plan. Its central theme is to achieve sustainable development by balancing social, economic and environmental issues. The vision acknowledges that some new development and change is necessary in order to meet the need for new homes and jobs set out in the Local Plan: Key Policies Pre-Submission (CD-01), but through good planning this can be achieved without compromising the District's unique character and environment. This will require close and integrated working by the Council, key stakeholders and all the local communities.
- 1.4. The core Strategic Objectives stem from the Council's Sustainable Community Strategy¹ which was the subject of consultation in 2009². The objectives show how the Council, through the Local Plan: Key Policies Pre-Submission (CD-01) intends to realise the vision, and these are further developed through the strategic policies of the Plan. The strategic policies will be monitored each year through the Authority's Monitoring Report (AMR), to see if they are working and helping to achieve the vision or whether they need reviewing.

2. Does the development strategy provide a robust framework for delivering the Plan's vision and objectives?

- 2.1 Yes, the development strategy of the Local Plan: Key Policies Pre-Submission (CD-01) provides a robust framework for delivering the Plan's vision and objectives. The development strategy has been developed from

¹ [Chichester – A Very Special Place](#)

² [Sustainable Community Strategy Consultation – February 2009](#)

the evidence base, consultation responses and the Council's existing strategies. The development strategy is therefore considered to be the logical result of this evidence.

2.2 The Local Plan: Key Policies Pre-Submission (CD-01) vision and objectives clearly address the issues facing the Plan area, such as the need for more housing, particularly affordable housing, without compromising the District's unique character and environment.

2.3 An example of how the vision and objectives are delivered through the strategy is the objective in the Local Plan: Key Policies Pre-Submission (CD-01) at paragraph 3.16 "a strong local economy where business can thrive and prosper". This is then reflected and will be delivered through the following policies:

- Policy 3, 'The economy and employment and provision'
- Policy 7 'Masterplanning'
- Policy 9 'Development and infrastructure provision'
- Policy 10 'Chichester city development principles'
- Policy 11 'Chichester city employment sites'
- Policy 14 'Development at Chichester city north'
- Policy 26 'Existing employment sites'
- Policy 27 'Chichester retail policy'
- Policy 28 'Edge and out of centre site – Chichester'
- Policy 29 'Settlement hubs and village centres'
- Policy 30 'Built tourist and leisure development'
- Policy 31 'Caravan and camping sites'
- Policy 32 Horticultural development areas'
- Policy 45 'Development in the countryside'.

2.4 The policies in the Local Plan: Key Policies Pre-Submission (CD-01) identify what development will happen and where it will be located. The Plan sets out as much that is reasonably possible as to when and how development will be delivered, taking into consideration the need for the Plan to be flexible to accommodate the changing economic and political environment over the Plan period.

2.5 The Council therefore considers that the Local Plan contains a clear and appropriate spatial vision for the District together with an agreed set of strategic planning objectives which are appropriate for the District. The policies set out within the Plan appropriately reflect the identified spatial vision and objectives as referred to.

3. Has the strategy been positively prepared and will it deliver sustainable development in accordance with policies in the National Planning Policy Framework (NPPF)?

- 3.1 Yes, it is considered that the spatial strategy of the Local Plan: Key Policies Pre-Submission (CD-01) will deliver development in a sustainable manner and is in accordance with National Planning Policy Framework (CD-62).
- 3.2 The Plan will deliver an increased rate of development over what has previously been achieved. Reference should be made to paragraph 2.1 and section 5 'Delivery of Development' of A Balanced Approach to Housing Provision (CD-09). Paragraph 2.1 outlines the proposed rate of 410 dwellings per annum to be delivered through the Local Plan. Section 5 sets out the housing completions and past delivery rates of the District, which for the period 2001-2013 has averaged as 346 net dwellings per year in the Plan area.
- 3.3 The four Strategic Development Locations (Shopwyke, West of Chichester, Westhampnett/NE Chichester and Tangmere) which will deliver the majority of housing are identified in the Local Plan: Key Policies Pre-Submission (CD-01) within the broad location of the East-West Corridor.
- 3.4 Compared to other parts of the Plan area, the East-West Corridor is considered to be the most sustainable location for development in line with the 'golden thread' running through the National Planning Policy Framework (CD-62) specifically paragraphs 14 and 17. Reference should also be made to proposed main modification **M60** which inserts a new introductory text to chapter 12 'the East-West Corridor'³. The proposed modification indicates that settlements in the East –West Corridor have the best transport connections and greater access to facilities. Chichester City is the Plan area's largest and most sustainable settlement and the Plan seeks to encourage new growth within and around the city. It is acknowledged that new development needs to be planned sensitively to respect the historic environment and its setting, while also addressing key infrastructure constraints i.e. wastewater treatment capacity and transport.

4. Is the strategy the most appropriate in the light of all the options and is it clear why other options were dismissed?

- 4.1 Yes, the Council considers that the strategy is the most appropriate for the Plan area over the period to 2029, as it the most sustainable and deliverable strategy, taking account of the identified needs of the area and the

³ [Schedule of Proposed Main Modifications to the Pre-submission Local Plan](#): Page 5

environmental and infrastructure constraints. The Plan strategy is based on comprehensive and robust evidence (see the response to Matter 2/5 below) and has been developed through extensive consultation with the statutory agencies, key service providers and local communities. A range of alternative options has been considered and consulted on during the Plan's preparation. The key stages in the Plan's preparation are set out in the Statement of Consultation (CD-06). All options considered have been appraised and where options have been dismissed, the reasons are set out in the Sustainability Appraisal (CD-03).

- 4.2 The strategy as proposed in the submission version of the Plan is summarised in paragraphs 4.7-4.10 of the Local Plan: Key Policies (CD-01 and CD-02) and is explained further in Chapter 2 of the Council's background paper, A Balanced Approach to Housing Provision (CD-09). The Plan strategy focuses the majority new development in the East-West Corridor, particularly in the area around Chichester city and at Tangmere, The four proposed strategic development locations (SDLs) are situated in this area. It is considered the most sustainable area for accommodating major new development in terms of accessibility to goods and services and the availability of more sustainable alternative modes of transport to the private car (i.e. walking, cycling, buses and trains). The evidence indicates that the landscape impact of new development will not be as severe in the East/West corridor as the other more remote parts of the Plan area, although the potential impact on the setting of the South Downs National Park is acknowledged.
- 4.3 The Manhood Peninsula is identified for only a limited amount of new development due a number of constraints. These include potential landscape impacts; the vulnerability of large areas to flooding; poor transport links and issues of traffic congestion leading to poor accessibility to higher order services and employment; and potential environmental impacts affecting Chichester Harbour, Pagham Harbour and the Medmerry realignment.
- 4.4 The north of the Plan area is similarly considered unsuitable for large scale development, due to its generally remote rural character, the potential landscape impact on the Low Weald and the setting of the South Downs National Park; the limited local employment, services and facilities requiring travel to other areas; and reliance on the private car as the only realistic mode of transport.
- 4.5 During the preparation of the Plan, the Council has explored a number of alternative development options. These have included:
- (i) Alternative locations for strategic housing development

- (ii) Higher levels of housing at the strategic development locations included in the Plan
 - (iii) Higher levels of housing at the settlement hubs
 - (iv) Higher levels of housing in other settlements (parish housing numbers)
- (i) Alternative locations for strategic housing development
- 4.6 The Focus on Strategic Growth Options (FoSGO) consultation (CD-41) consulted on potential strategic development locations South West of Chichester and at Fishbourne. These locations were not carried forward into the subsequent Housing Numbers and Locations consultation (CD-97). As indicated in the Sustainability Appraisal (SA) (CD-03), this reflected the lack of capacity at the Apuldram waste water treatment works and consequent impacts on Chichester Harbour Special Protection Area (SPA) and secondly recreational disturbance impacts on the SPA. The lack of facilities and infrastructure at Fishbourne was also highlighted as an issue.
- 4.7 Since the FoSGO consultation, further evidence has led to an identified mitigation strategy to address the potential recreational disturbance impacts, although the South West Chichester and Fishbourne locations are still considered likely to be too close to the Harbour for the strategic mitigation measures (identified through the Solent Disturbance and Mitigation Project) alone to be effective. However, in addition to the lack of capacity at Apuldram WwTW, there are still considered to be significant reasons for not favouring strategic development at either location. At South West Chichester, a large part of the site falls within the Environment Agency flood zones 2 and 3, whilst the proximity of the site to the AONB would be likely to result in significant visual impact. At Fishbourne, there are concerns over the impact of strategic development on the character of the village, the location of the site in the open countryside and the visual impact from the SDNP and the surrounding landscape.
- (ii) Higher levels of housing at the strategic development locations allocated in the Plan
- 4.8 West of Chichester – The FoSGO consultation identified the location as having potential for up to 2,000 homes. The SA assesses three options – 1,000 homes (the proposed Local Plan figure), Less than 1,000 (400-700 homes) and More than 1,000 (1,500+ homes) within the Plan period. The higher option is considered likely to result in benefits in terms of housing, employment and sustainable travel, but likely to create significant adverse impacts in terms of biodiversity loss, air pollution and traditional urban form. Overall, the SA indicates that 1,000 homes would bring significant benefits,

but have fewer potentially severe adverse impacts compared to a larger development.

- 4.9 The Local Plan allocates sufficient land to deliver 1,600 homes in total. However, due to the current wastewater treatment constraints, development is not expected to come forward until 2019 following the expansion of the Tangmere WwTW. This allows only a ten year build period up to the end of the Plan and the Council considers that planning for more than 1,000 homes within this timespan would be difficult to achieve, particularly in view of the need to mitigate the adverse impacts identified in the SA and phase delivery of key infrastructure in conjunction with housing development.
- 4.10 Westhampnett/North East Chichester – Higher levels of development were consulted on in both FoSGO (up to 1,500 homes) and Housing Numbers and Locations (up to 1,100 homes). The SA assesses two options – 500 homes (the proposed Local Plan figure) and More than 1,000 homes. The higher option is considered likely to generate more significant benefits for a number of indicators, such as housing need, modal shift and low carbon energy, but is likely to lead to significant negative impacts in terms of landscape conservation, traditional urban form and quality of life (this being due to noise impacts on the development from the Goodwood Motor Circuit). Overall, the SA analysis reinforces the Council's view that development should be limited to no more than 500 homes. The South Downs National Park Authority (SDNPA) has also indicated that it would be concerned if the scale of development at Westhampnett/North East Chichester were to increase above the current proposed level.
- 4.11 Tangmere - Both the FoSGO and Housing Numbers and Locations consultations identified Tangmere as having potential for up to 1,500 homes. The SA assesses options of Up to 1,000 homes (broadly equivalent to the level proposed in the Local Plan) and More than 1,000 homes (up to 2,000 – 2,500 homes). The higher option is considered likely to generate significant benefits in terms of addressing housing need and access to facilities, but overall shows slightly fewer positive impacts, with potentially negative effects in terms of resources and sustainable travel and consumption.
- 4.12 As at West of Chichester, a further consideration is that the current lack of wastewater capacity means that development is not expected to commence before 2019, and development of more than 1,000 homes over the following 10 years to 2029 is not considered likely to be deliverable.
- (i) Higher levels of housing at the settlement hubs

4.13 Southbourne - Options for higher levels of housing were included in the Housing Numbers and Locations consultation (up to 500 homes) and Parish Housing Numbers consultation (350-600 homes for the parish) (CD99a & CD99b). The SA (CD-03) assesses options of 250-500 homes (broadly equivalent to the Local Plan) and A lot more houses (700+ homes). The higher option shows significant positive benefits for a range of indicators, including housing need, sustainable transport and the economy, but also has potential to create severe adverse impacts on water and waste resources, biodiversity and urban form.

4.14 Selsey – Options for higher levels of housing were included in the Housing Numbers and Locations consultation (up to 200 homes) and Parish Housing Numbers consultation (150-250 homes for the parish). The SA assesses options of 150-200 homes (broadly equivalent to the Local Plan) and A lot more houses (350+ homes). Overall the SA shows potentially greater adverse compared to positive impacts for both options, but more severe for the higher housing option – mainly relating to adverse impacts related mainly to the environment (e.g. biodiversity loss, flood risk and adaption to climate change) and in terms of access to jobs and facilities.

4.15 East Wittering/Bracklesham – Options for higher levels of housing were included in the Housing Numbers and Locations consultation (up to 750 homes) and Parish Housing Numbers consultation (350-600 homes for the parish). The SA (CD-03) assesses three options – 50-100 homes (broadly equivalent to the Local Plan); 250-300 homes and Over 500 homes. The higher options, whilst having some positive impacts, generate significant negative impacts mainly relating to the environment, travel patterns and access to jobs.

(iii) Higher levels of housing for other settlements (parish housing numbers)

4.16 Local Plan Policy 5 provides for a total of 775 homes to be delivered through small scale housing sites identified in other settlements (including on brownfield sites within Chichester city). During preparation of the Local Plan, higher levels of provision were considered. The Housing Numbers and Locations consultation considered options of up to 800 homes on non-strategic sites in the South of the Plan area and up to 330 homes in the North of the Plan area. The Parish Housing Numbers consultation considered up to 1,340 homes on non-strategic sites in the south of the Plan area (excluding Southbourne, Selsey and East Wittering/Bracklesham) and up to 375 homes in the north.

4.17 The SA of Policy 5 (Parish Housing Sites) considers two options – Lower numbers (equivalent to the Local Plan) and Higher numbers (equivalent to

the upper end of the range proposed in the Parish Housing Numbers consultation). The higher option is considered likely to deliver greater benefit in terms of meeting housing need, achieving a sustainable mix of housing and assisting the rural economy, but leads to potential adverse impacts in terms of a wide range of criteria, including biodiversity, water resources, need to travel and traditional urban form.

5 Is the Plan justified by a robust and credible evidence base?

- 5.1 Yes, the Council considers that the plan evidence base is robust and credible, meeting the requirements set out in the National Planning Policy Framework (NPPF) (CD-62). NPPF Paragraph 158 indicates that local plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Subsequent paragraphs of the NPPF, together with the accompanying NPPG on Local Plans, specify further what evidence is required to underpin local plans.
- 5.2 The evidence base supporting the Local Plan is listed in full in the Core Documents List (CD-00)⁴, is referenced throughout the Local Plan: Key Policies document, and included as Appendix C of the Local Plan: Key Policies (CD-01). It is not possible here to reference all the evidence supporting the Plan, however, the paragraphs below summarise how the evidence base has informed the Plan in accordance with the NPPF requirements.
- 5.3 Housing – The Plan housing policies draw on evidence provided in the Coastal West Sussex Strategic Housing Market Assessment (SHMA) (CD-17a & CD-17b) which was commissioned jointly by the Council with the other coastal West Sussex authorities and the South Downs National Park Authority (SDNPA). The SHMA informs the policies for housing provision, as well as policies for residential development and affordable housing. Subsequent housing studies undertaken jointly across the housing market area have updated the assessment of objectively assessed needs (OAN) – these include the Housing Study (Duty to Cooperate) (CD-49a & CD-49b), Updated Demographic Projections (CD-87) and the Assessment of Housing Development Needs Study (CD-10).
- 5.4 The Council has also prepared a Strategic Housing Land Availability Assessment (SHLAA) (CD-16), which was first published in 2010 and has since been updated twice. The SHLAA has provided information on the potential availability of sites for development and this has informed both the

⁴ [Core Documents List \(CD-00\)](#)

overall Plan strategy and the level of housing provision proposed for different settlements and parishes in the Plan area.

- 5.5 The Settlement Capacity Profiles (CD-75) brings together evidence from a range of sources to assess the potential of different settlements to accommodate growth, particularly new housing. It is a key piece of evidence underpinning the settlement hierarchy and housing distribution set out in the Plan.
- 5.6 Employment – The Local Plan strategy for the economy and employment provision draws on evidence relating to existing business needs and likely changes in the market. It closely reflects the main priorities identified in the Economic Strategy for Chichester 2013-2019 (CD-36), which in turn reflects the key priorities of the Coast to Capital Local Enterprise Partnership (LEP)⁵ and the Economic Strategy for West Sussex (CD-83).
- 5.7 Local Plan Policy 3 and the other policies for new employment provision are based directly on the evidence provided in the Employment Land Review Update 2012 (CD-12). The ELR Update was undertaken in summer/autumn 2012, at the same time as the update of the Economic Development Strategy, and involved direct liaison with the local business community to understand their future needs. Assessment of the continuing suitability of existing employment sites had been previously undertaken in the 2009 Employment Land Review (CD-11).
- 5.8 The Plan has also been informed by other studies relating to specific employment sectors. Future retail requirements and town centre policy were reviewed through the Retail Study Update (CD-73) and policies for horticultural development draw on Growing Together - A Strategy for the West Sussex Growing Sector (CD-42).
- 5.9 Infrastructure – Throughout the Plan process, the Council has undertaken on-going liaison with the statutory agencies and key infrastructure providers. Through these discussions and detailed technical work, the Council and these partners have assessed the capacity of existing infrastructure to accommodate new development and identified necessary infrastructure improvements to support the Plan strategy. A key example is the work undertaken by the Council and other members of the Water Quality Group⁶ to identify solutions to mitigate environmental water quality constraints and ensure that wastewater infrastructure can be delivered. This has included commissioning the Strategic Growth Study – Wastewater Treatment

⁵ [Coast to Capital Local Enterprise Partnership](#)

⁶ The Water Quality Group comprises Chichester District Council, West Sussex County Council, Environment Agency, Natural England, Southern Water and Chichester Harbour Conservancy.

Options (CD-81a-c), preparing the Water Quality and Strategic Growth Background Paper (CD-89) and the Position Statement on Wastewater and Delivering Development (CD-15). This work has underpinned Southern Water's bid to Ofwat (as part of its 2015-2020 Business Plan) for a scheme to increase the capacity of Tangmere Wastewater Treatment Works (WwTW) to support the strategic housing development identified in the Plan, as well as their investment in upgrading the storm water discharge to release existing wastewater headroom at Apuldram WwTW.

- 5.10 A similar approach has been adopted with regard to roads and transport, where the Council, assisted by West Sussex County Council, the Highways Agency and strategic site promoters commissioned the Transport Study of Strategic Development Options (CD-18a & CD-18b). This has led to the inclusion in the Plan of an integrated strategic transport infrastructure package funded by development, which will mitigate traffic impacts on the A27 junctions and other routes in and around Chichester city.
- 5.11 The Plan is supported by an Infrastructure Delivery Plan (IDP) (CD-50), which has been prepared through on-going engagement with the infrastructure providers. Section B of the IDP provides details on broad strategic infrastructure provision and funding sources for the various infrastructure categories, and Section C sets out the infrastructure delivery schedules for each of the strategic development locations, and more general district-wide infrastructure delivery.
- 5.12 Environment – The Plan strategy has been strongly influenced by evidence relating to environmental constraints, reflecting the need to protect and conserve the environment and ensure that development impacts are avoided or mitigated. The Plan is supported by a Sustainability Appraisal (CD-03) (which meets the European Directive on strategic environmental assessment) and a Habitats Regulations Assessment (CD-04).
- 5.13 Detailed studies have been undertaken to assess the potential impacts of development on the internationally designated nature conservation sites at Chichester and Langstone Harbours, and Pagham Harbour. Following the conclusions of the Solent Recreational Disturbance and Mitigation Study (CD-77a-d), the Plan includes provision for a package of avoidance and mitigation measures to address the impact of recreational disturbance from new development. The Plan provides for a similar approach in relation to Pagham Harbour based on evidence from the Pagham Harbour Visitor Study (CD-67).
- 5.14 Evidence relating to flood risk has been drawn from the Strategic Flood Risk Assessment (CD-80a-g) and from the Environment Agency's flood maps

(CD-39 & CD-40). The Plan policies for the coastal areas have also been informed by the Beachy Head to Selsey Bill Shoreline Management Plan (CD-20), North Solent Shoreline Management Plan (CD-64) and the Coastal Defence Strategy (CD-30).

5.15 Landscape, character and heritage - the overall Plan development strategy reflects evidence relating to landscape sensitivity (particularly close to the boundary of the National Park and within and close to the Chichester Harbour AONB), as well as the character and heritage of the Plan area and the settlements within it. Evidence on landscape sensitivity is drawn from a number of studies including the Landscape Capacity Assessment (CD-52a-n), Landscape Capacity Assessment Extension (CD-53a-p), the Future Growth of Chichester study (CD84a & b) and the Chichester Harbour AONB Landscape Character Assessment (CD-26). Evidence on the historic environment includes the Historic Landscape Characterisation of Sussex (CD-47) and Conservation Area Character Appraisals (CD-32).

5.16 Health and well-being – The Council’s Open Space Study (CD-65a-f) provides the key evidence supporting Policy 54 (as amended by proposed main modification **M169**) which sets out policy and standards for new open space, sports and recreation facilities⁷.

5.17 Viability and deliverability – In developing the Plan strategy, the Council has worked closely with infrastructure providers and the strategic site promoters to assess the viability and deliverability of proposed development. The Council commissioned a Development Viability Assessment Study (CD-37) which assessed the cumulative viability and overall deliverability of the Plan strategy, taking account of development costs and potential funding requirements for infrastructure. This work has informed the Plan affordable housing policy, Infrastructure Delivery Plan (IDP) (CD-50), and the Council’s continuing work to prepare a Planning Obligations SPD and CIL Charging Schedule.

6 Does the Plan provide an effective monitoring framework, which identifies risks to delivery and provides contingencies/ triggers for action if progress is not made as planned?

6.1 Yes, Appendix G of the Local Plan (CD-01) provides a monitoring framework to assess the implementation of the policies contained in the Local Plan. Risks to delivery are identified in paragraphs 7.15 to 7.23 of the Local Plan. Risks and contingencies to housing delivery are also set out in Section 6 of the Housing Implementation Strategy (CD-48). This identifies

⁷ [Schedule of Proposed Main Modifications to the Pre-submission Local Plan](#): Page 24

risks relating to housing delivery on the strategic development locations, the parish housing sites and in general. The main identified risks are listed and in each case action either already taken, or proposed to address each issue, are identified.

- 6.2 The Authority's Monitoring Report will assess the implementation and effectiveness of Local Plan policies. This monitoring will indicate whether any amendments need to be considered if a policy is not working, or if the targets set out in the Local Plan monitoring framework are not being met. The forthcoming Site Allocation DPD will identify sites for development for employment and potentially housing if required because Neighbourhood Plans fail to identify suitable housing sites.

7 Does the Plan include flexibility to allow for changing circumstances, particularly with regard to the dependency of development in the SDLs on the provision of key infrastructure such as highway improvements and the upgrade to Tangmere WwTW?

- 7.1 Yes, the Plan provides some flexibility, although the scope for providing contingencies is restricted by the scale and nature of the environmental and infrastructure constraints affecting the Plan area. As referenced in the background paper, A Balanced Approach to Housing Provision (CD-09), the Council considers that there are few sustainable options for development within the Plan area and that, within the context of the identified constraints, the Plan strategy presents the most sustainable approach to delivering development in the area.
- 7.2 In these circumstances, the Council's general approach has been to seek to minimise potential risks to the delivery of the SDLs by working closely with site promoters, infrastructure/ service providers and statutory agencies during the plan preparation process, in order to identify all potentially critical constraints and infrastructure requirements in advance. The key infrastructure requirements linked to the SDLs are identified in Section C of the Infrastructure Delivery Plan (CD-50), which sets out the infrastructure delivery schedules for each of the strategic development locations. With the exception of the SDL at Shopwyke (most of which already has outline planning permission), it is intended that the phasing and delivery of infrastructure at the other three SDLs (West of Chichester, Westhampnett/North East Chichester and Tangmere) will be determined through the masterplanning process.
- 7.3 Work towards the delivery of the SDLs is now quite advanced. As noted above, most of the SDL at Shopwyke already has outline planning permission and an application for Reserved Matters is imminent. The

Council has undertaken work to prepare Concept Statements for the SDLs at West of Chichester and Westhampnett/North East Chichester, which set the parameters for masterplanning work. At Westhampnett/North East Chichester, the site promoters have already submitted an outline planning application for development of part of the site, whilst at West of Chichester, the site promoters are currently undertaking masterplanning work, with input from the Council, West Sussex County Council and local community. At Tangmere, the concept planning work is being led by the Parish Council (with support from Chichester District Council) and will be incorporated in the Neighbourhood Plan (the Parish Council is intending to consult on the pre-submission version of the Plan in September 2014).

- 7.4 The Council has also undertaken work to assess the viability of proposed development. The Council commissioned a Development Viability Assessment Study (CD-37) which assessed the cumulative viability and overall deliverability of the Plan strategy, taking account of development costs and potential funding requirements for infrastructure. This included assessing the viability and deliverability of the SDLs. Based on the work undertaken, the Council and the site promoters are confident that all infrastructure requirements identified for the SDLs can be delivered at a cost that is viable for development.
- 7.5 The most significant risk to delivery of the SDLs is their dependency on the planned expansion/ upgrade of the Tangmere WwTW to provide additional wastewater capacity. Southern Water has submitted a scheme for Tangmere WwTW to Ofwat (as part of its 2015-2020 Business Plan) and is confident that Ofwat approval will be secured. Subject to Ofwat approval, the expanded/upgraded Tangmere WwTW would be operational in 2019. For this reason, the Local Plan phases the SDLs at West of Chichester, Westhampnett/ North East Chichester, and Tangmere for delivery from 2019 onwards.
- 7.6 The current position of Southern Water and the Environment Agency is that the SDLs cannot come forward for development until the improvements at Tangmere WwTW have been carried out. However, the wording of Local Plan policies 15, 17 and 18 is not specific, stating that *“Development will be dependent on the provision of infrastructure for adequate wastewater conveyance and treatment to meet strict environmental standards”*. This allows flexibility for other wastewater solutions if these can be demonstrated. In the unlikely event of the expansion/upgrade of the Tangmere WwTW not being approved, the other SDLs may explore the feasibility of delivery of on-site solutions as a contingency, although this is not the Council’s favoured approach. However, the feasibility of on-site treatment has currently not been tested.

- 7.7 With regard to highways improvements, the Local Plan and IDP identify a package of strategic transport infrastructure to mitigate the potential traffic impacts of the planned developments, which will be funded from development contributions. This will involve both proposed improvements to the six junctions on the A27 Chichester Bypass and integrated measures to address congestion on the local road network in and around Chichester city. The highways and other transport improvements will be phased in line with the delivery of development through the IDP and the respective masterplans.
- 7.8 It should be noted that the A27 at Chichester has been identified as a priority for capital investment in the Government's June 2013 Spending Review. The A27 Chichester improvements are now included in the Highways Agency's work programme for 2015-2019 and the Agency is currently working to identify options, which are due to be announced in Spring 2015. The transport measures included in the Local Plan are not dependent on this process – they are intended to be funded from development and will provide effective mitigation independent of any wider A27 improvements. At the same time, it is recognised that there will be a need to coordinate the Local Plan transport measures with the proposed improvements to the A27 when these are finalised. Overall, the likelihood of Government funded improvements to the A27 early in the Plan period may allow additional flexibility with regard to transport planning in and around Chichester city.
- 7.9 Overall, the Council accepts that the Plan strategy relies on the delivery of the SDLs, which in turn depends on the provision of key infrastructure, particularly with regard to wastewater treatment and highways improvements. Ideally, a greater level of flexibility would be built into the Plan strategy, however the severity of the environmental and infrastructure constraints affecting the Plan area means that there is no realistic scope for bringing forward alternative development locations which are not subject to the same (or equivalent) infrastructure constraints. However, the work to bring forward development at the SDLs is now well advanced and the Council is confident that all the major risks to delivery of the SDLs have been identified and have been (or are in the process of being) addressed. The only potential "showstopper" relates to wastewater capacity, and the Council believes that its on-going work with Southern Water, the Environment Agency and the site promoters has reduced this risk to a minimum.

8 Does the Plan set out clearly which parts of the 1999 Chichester District Local Plan it will replace?

8.1 Paragraph 1.2 of the Local Plan (CD-01) states that the “Local Plan will replace those parts of the 1999 Chichester District Local Plan that currently apply”. The Schedule of Proposed Additional Modifications to the Pre-submission Local Plan (CD-02b) contains a proposed additional modification **M2** to remove this paragraph, as no parts of the 1999 Chichester District Local Plan will remain upon adoption of the Local Plan⁸.

⁸ [Schedule of Proposed Additional Modifications to the Pre-submission Local Plan](#): Page 1