



Chichester Local Plan Examination statement

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## **Evidence Audit – Housing Provision**

November 2014

# Chichester Local Plan Examination statement

## Evidence Audit

This statement has been produced as part of the examination of the Chichester Local Plan. It answers the Inspector's questions relating to the evidence base and the provision for housing.

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## 1. Introduction

- 1.1. During the examination hearing on 8th October the Inspector indicated that she had not seen up to date evidence to justify the District Council's proposed housing figure of 410 dwellings per annum (dpa) over the 17 year plan period. The Inspector asked whether the Council wished to initiate an audit of the evidence to demonstrate how constraints had led it to arrive at the 410 figure.
- 1.2. The Inspector clarified that the review of the evidence should consider all potential sites and all potential ways to deliver housing within the plan area and may involve updating or augmenting the evidence base, rather than just an audit. In particular the Inspector asked the Council to ensure that the link between the information in the Strategic Housing Land Availability Assessment (CD-16) and the Settlement Capacity Profiles (CD-75) is clear and to refresh the Settlement Capacity Profiles if necessary.
- 1.3. After due consideration the Council agreed that it would initiate an audit and review of the evidence and would attempt to carry this out as quickly as possible.
- 1.4. The statement incorporates:
  - An explanation and justification for the housing figure proposed in the Local Plan.
  - A commentary setting out the timing of changes to the calculation of objectively assessed need for housing.
  - A commentary on the existing transport evidence.
  - An update on the wastewater treatment capacity constraining development.
  - A review of the sites identified in the SHLAA (other than those identified as having no potential).
  - The identification of the potential to increase housing provision.

## 2. The Evidence

- 2.1. The Inspector has queried how the housing provision figure in the plan related to the changing estimates of the objectively assessed need (OAN) for housing. The table attached at **Appendix 1** draws together the different components of the evidence base and how the estimate of OAN has changed over time and relates this to the different stages of plan preparation.

- 2.2. In describing the Council's approach to determining the Local Plan overall housing number, it is relevant to consider the evolution of the plan. The Local Plan has been in the process of preparation for a number of years and clearly work began with the adoption of the South East Regional Plan housing figure (480dpa for the whole district). Following this a number of studies, consultations and considerations have led the Council to the conclusion that a figure of 410 dwellings per annum is acceptable for the plan area and can be delivered.
- 2.3. The report to Cabinet that recommended the Local Plan: Preferred Approach in March 2013 contained an appendix that provided an explanation and justification for the housing number in the plan. This is attached as **Appendix 2** to this statement.
- 2.4. It is worth noting that based upon the advice of the Development Plan Panel at the meeting on 23 July 2013, the Council resolved..... That the supporting text to Policy 4 at Paragraph 7.3 be amended to indicate that the housing target in the Draft Local Plan should be adjusted to 410 homes per year spread across the whole of the Local Plan period instead of 395 homes per year plus an initial 258 homes shortfall. The amended text will read:  
*'Based on this evidence, the Local Plan makes provision to deliver a total of 6,973 homes over the period to 2029. This equates to an average housing delivery of approximately 410 homes per year, comprising 390 homes per year in the Plan Area (South) and 20 homes per year in the Plan Area (North).'*

### **Meeting Objectively Assessed Need for Housing**

- 2.5. As can be seen from the table at **Appendix 1**, the Council was, at the point of consultation on the Local Plan Preferred Approach, planning to meet OAN towards the top of the range. As the calculation of OAN changed, the Council was then, during the further consultation on the preferred approach in July 2013, planning to meet the lower end of the range of OAN.
- 2.6. The point at which the Council was no longer proposing to plan to meet OAN was when the updated projections for the Sussex Coast HMA were published in August 2013 (CD-87). At this point in time the Council did not pause in the preparation of the plan to seek to plan for more homes but decided to press ahead with the plan which had been some three years in preparation. This was in the context of the fact that the plan already proposed a significant increase in housing development over past rates of

delivery<sup>1</sup> and a major expansion of Chichester and Tangmere through the identification of strategic development locations, contrary to the majority of views expressed through public consultation.

- 2.7. Had the Council decided to pause and carry out an additional further consultation to plan for a higher housing number it would have needed to:
- Identify the sites to deliver the housing (possibly with alternative options)
  - Re-evaluate and potentially refresh the evidence base (particularly with respect to transport and the Habitat Regulations Assessment)
  - Consider the outcome of the consultation before deciding whether to proceed with the proposals in the plan.
- 2.8. It is uncertain how long it would have taken the Council to decide which sites would deliver the housing provision and assemble sufficient evidence to ensure adequate mitigation for impacts of, and infrastructure provision for, the development.
- 2.9. Had this process taken place, the Council would have faced some difficulty since before it had been concluded the calculation of OAN changed again with the publication of the Assessment of Housing Development Needs Study (April 2014) (CD-10). If the Council had taken the decision to pause and review its position in August 2013, it is likely that the Council would have needed to repeat the actions in paragraph 2.7 above again in April 2014.
- 2.10. The estimate of OAN changed further in August 2014 with the publication of the Review of OAN in Light of 2014 SNPP (Appendix 5A to CDC statement on Matter 5). Had the Council decided to pause in its plan making to take account of the change in OAN in August 2013 and again in April 2014, it may then have wished to revise the plan again in the light of the latest evidence in August 2014.
- 2.11. The point that the Council wishes to emphasise is that the evidence base is constantly changing and there is a need at some point to complete the plan-making process. Consequently, and notwithstanding the changes to OAN, the Council decided in October 2013 to press ahead with the plan. This has provided certainty for infrastructure providers, investment decisions and the development of the CIL charging schedule. Were the plan to be paused and potentially reviewed whenever the evidence base changed it would make it extremely difficult to put a plan in place. Should the adoption of the plan be delayed, the introduction of CIL will be delayed

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<sup>1</sup> 410 dpa compared to 329 dpa 2006-13

with the effect of reducing the funding available for infrastructure. It is also likely that the production of neighbourhood plans will be suspended while the outcome of housing distribution is determined, slowing the delivery of housing through the plan-led system.

### 3. Transport Evidence

- 3.1. As part of the preparation of the Local Plan the Council commissioned Jacobs to assess the impact of development on the road network and the mitigation needed to address that impact (The Chichester Transport Study of Strategic Development Options (CD-18)). Following the initiation of the audit of the evidence base the Council has sought a view from West Sussex County Council (as Highway Authority) as to the scope to increase housing provision within the scope of the existing transport assessment. The County Council has provided advice in the form of a note which is attached as **Appendix 3** to this statement.
- 3.2. Whilst the table in **Appendix 3** refers to 440 homes/year, this was actually an expression of the maximum amount of development that was tested and then divided by the number of years in the transport model and only referred to rate of development in the south of the plan area (over 18 years). The total amount of development tested was 8,100 homes (including proposed development in the north of the plan area and commitments at 2011). In calculating remaining capacity, absolute figures have been calculated to take in to account completions and additional housing added to the supply since 2011.
- 3.3. The overall conclusion of the assessment of the existing transport evidence is that the housing provision figure within the plan area could only increase by a total of 415 over the Plan. Were a housing provision figure in excess of 415 to be taken forward, the evidence in relation to transport impacts and mitigation would need to be reassessed. **Appendix 4** sets out the calculation for the remaining highways capacity during the Plan period.
- 3.4. The note from the County Council also provides information as to where additional development could be accommodated within the scope of the existing transport evidence base. This concludes that there is only capacity at the West of Chichester, Westhampnett/NE Chichester and Tangmere strategic development locations, within the built up area of Chichester, East Wittering/Bracklesham and Tangmere.

### 4. Wastewater Treatment Capacity

- 4.1. The paper 'A Balanced Approach to Housing Provision (CD-09)' set out the remaining capacity at the various wastewater treatment works throughout the plan area. This has now been updated to take account of planning permissions granted up to 31<sup>st</sup> March 2014 and is attached at **Appendix 5**.
- 4.2. The conclusion of this analysis is that there is capacity for further development that would drain to the Bosham, Pagham, Sidlesham, Thornham and Wisborough Green wastewater treatment works. The capacity generated by the upgrade to Tangmere will be fully utilised by existing Local Plan proposals, although it is understood that it would be technically possible to further increase the capacity, subject to Ofwat approval.
- 4.3. There is no capacity at the current time for further development at Kirdford, Loxwood (beyond the current parish number), Tangmere, Lavant or Chichester (Apuldram catchment). Whilst there is some limited capacity at Apuldram (154 dwellings + 97 dwellings remaining from the parish number), the Council has formally resolved that this should be reserved to allow for continuing redevelopment within the settlement boundary of the city.
- 4.4. It should be noted that the capacity figures in **Appendix 5** are related to the capacity of the wastewater treatment works. They do not refer to the capacity of the network required to convey the sewerage to the treatment works. This will need to be assessed on a case-by-case basis with respect to the individual proposals for development, which can be required to provide sufficient network capacity to meet the needs of that development. Existing problems with the network will need to be resolved by through Southern Water's routine maintenance and investment programme.

## **5. Settlement Character and Capacity**

- 5.1. The Settlement Capacity Profiles (SCP) (CD-75) is a key part of the evidence base, which underpins the development strategy and settlement hierarchy set out in Policy 2 of the Plan. The SCP is also used to explain and justify the level of housing proposed for parishes and settlements in the Local Plan.
- 5.2. The Council considers that to plan development sustainably, it is important to have an understanding of the character, role and function of different settlements and how they relate to each other within settlement hierarchies. It is also necessary to identify the future requirements of different communities and to assess their potential capacity for future growth and change.

- 5.3. The SCP draws together a wide range of information relating to the existing characteristics of different settlements, their range of local facilities (and accessibility to facilities elsewhere), potential constraints (environmental and infrastructure) and land availability which may affect their future growth.
- 5.4. The size, character and range of facilities in each settlement were used as the basis for the settlement hierarchy set out in Local Plan Policy 2. The settlement hierarchy reflects the role and function of different settlements (whilst accepting that some settlements might require the provision of additional facilities in order to fully meet their settlement hierarchy definition, in particular Tangmere).
- 5.5. With the exception of the SDLs, the level of housing proposed for different settlements and parishes reflects their position in the identified hierarchy, with higher levels of housing being proposed for the Settlement Hubs, compared to the Service Villages.
- 5.6. Potential land availability (based on the SHLAA) was one of the inputs influencing the level of housing proposed for the Settlement Hubs and Service Villages as defined in the hierarchy. However, the availability of SHLAA sites did not determine the housing numbers proposed in the Plan, but was used more generally as a guide, indicating whether the housing numbers proposed were likely to be achievable.
- 5.7. The strategic housing numbers identified for the Settlement Hubs of East Wittering/ Bracklesham, Selsey and Southbourne reflected the availability of sites identified in the SHLAA, but the level of housing has been adjusted to reflect the environmental and infrastructure constraints affecting each of these settlements.
- 5.8. In addition to the Settlement Hubs, parishes containing Service Villages were also allocated parish housing numbers (set out in Local Plan Policy 5). As a general principle, the level of housing proposed reflected the size and range of functions available in the Service Village(s) within each parish. Parishes with larger Service Villages providing a reasonable range of everyday facilities (e.g. post office/convenience store, primary school, community hall) were generally given an indicative figure of 50 dwellings in the South of Plan area and 60 dwellings in the North of Plan area (reflecting fewer settlements and more limited housing opportunities in the North). Parishes with medium sized Service Villages providing more limited facilities were generally given an indicative figure of 25 dwellings. Parishes without Service Villages were not allocated any housing (although affordable housing may come forward on rural exception sites).



- 5.9. For some parishes, the indicative housing numbers proposed in the Plan have been reduced to reflect the severity of constraints and/or lack of SHLAA sites. Examples include Westbourne, Camelsdale/Hammer and Plaistow/Ifold.
- 5.10. It is intended that further analysis of SHLAA sites would be undertaken in identifying housing sites to be allocated in neighbourhood plans and the proposed Site Allocations DPD.
- 5.11. The Council considers that, other than with respect to land availability, the information presented in the SCP remains sound. As such, the Council considers that the SCP continues to provide robust evidence supporting the settlement hierarchy set out in Policy 2 and in providing a general guide indicating the relative capacity of different settlements to accommodate housing growth.
- 5.12. The above paragraphs demonstrate that there is a link between the SHLAA and the Settlement Capacity Profiles.

## **6. Review of SHLAA sites**

- 6.1. Attached at **Appendix 6** is a spreadsheet showing the analysis of sites identified as having development potential in the Strategic Housing Land Availability Assessment (SHLAA) (CD-16). Assessment of sites for inclusion within the SHLAA was not undertaken on a detailed basis. This was partly due to the number of sites put forward but also due to the status of the SHLAA as an evidence base document rather than having any policy basis. In particular the SHLAA makes it clear at paragraph 3.22 that landscape or character issues would need further assessment. The footnote on that page also makes it clear that the methodology for assessing a site as suitable within the SHLAA does not mean that the Council considers the site suitable for development.
- 6.2. The spreadsheet at **Appendix 6** contains a further analysis as to whether there is potential to increase the amount of residential development proposed in the Local Plan. SHLAA sites that have 'no potential' or that have already gained planning permission have not been included in the review. Sites that have already been allocated in emerging or made neighbourhood plans have been referenced and discounted.
- 6.3. This review of SHLAA sites has not been extended to include sites in the north of the plan area as the amount of development that needs to be

identified as a result of the parish numbers in the plan is more than the SHLAA sites with potential for development.

- 6.4. Each site has been analysed in terms of its categorisation in either the Landscape Capacity Assessment (CD-52) or The Future Growth of Chichester: Landscape and Visual Amenity Considerations (CD-84). The former document states that sites categorised as negligible, negligible/low, low or low/medium landscape capacity should not be considered as acceptable. The latter document states that landscape parcels with a moderate to high score for landscape sensitivity or priority views represent a severe constraint to built development in terms of landscape character.
- 6.5. The sites have been placed into two groups: those that the Council considers do have the potential to increase housing supply above the existing local plan figure and those that do not. The sites that have been excluded have largely been excluded on landscape grounds, although some have already been allocated in neighbourhood plans and others have appeal decisions which have ruled them out for more subjective character reasons.
- 6.6. It should be noted that this is a relatively high-level analysis and there are some sites where, for example, the landscape assessment indicates that it is least sensitive, but following a detailed consideration planning permission has been refused and the subsequent appeal dismissed because of the impact of the development on the character of the area. This further review of the SHLAA sites therefore does not provide a definitive determination as to whether a site is acceptable in planning terms.

## **7. Conclusion – Potential to Increase Housing Provision**

- 7.1. There is limited capacity within the context of the existing evidence base to increase housing provision. As stated in paragraph 3.2 above this is restricted to a maximum of 415 dwellings within the plan area. With reference to individual sites and the existing transport evidence, capacity exists at:
  - West of Chichester SDL 350 dwellings
  - Westhampnett/NE Chichester SDL 700 dwellings
  - Tangmere SDL 350 dwellings
  - Chichester City 85 dwellings
  - East Wittering/Bracklesham 210 dwellings
  - Tangmere (outside SDL) 80 dwellings.

It is not possible to aggregate the above sites as this will exceed the overall capacity of the model.

- 7.2. The Council would have no objection to bringing forward the development of an additional 250 dwellings at the West of Chichester site and considers that this rate of development would be deliverable during the plan period. The Council is of the view that development can commence in 2019 when the upgrade to the Tangmere Wastewater Treatment Works is complete. The site promoters are suggesting that it may be possible to commence development earlier than this with on-site sewerage treatment. The Council has previously considered that development can be delivered at a rate of 100 dpa. If this were to increase to 125 dpa from 2019 (development can commence earlier) then an extra 250 dwellings would be delivered during the plan period. The site promoters have confirmed that this amount of development would be deliverable.
- 7.3. The Council would have strong objections to increasing the housing provision at the Westhampnett/NE Chichester SDL. The Council's reasons for this position are set out in **Appendix 7**.
- 7.4. The Council would have strong objections to increasing the amount of development proposed at the Tangmere SDL. The Council considers that additional development would not be deliverable within the plan period. Also, the amount of development already planned for at Tangmere, both in terms of the strategic development location and also the 230 dwellings that have planning permission but have yet to be constructed, means that Tangmere is already accommodating a very substantial amount of development. For a settlement of this size it would not be possible to effectively integrate any more development with the existing community during the plan period.
- 7.5. The Council considers that a modest amount of additional development (85 dwellings) could come forward within Chichester City or adjoining areas, and there is potential to allocate land within the intended site allocations document.
- 7.6. Within the existing transport evidence there is scope to increase the amount of housing at Bracklesham/East Wittering. The current parish number is for 100 dwellings. The review of SHLAA sites indicates that there is land available that may be acceptable in landscape terms and is not in flood zone 1 or 2. Whilst the parish is close to Chichester Harbour and the Medmerry realignment, subject to the mitigation proposals included in the Solent Disturbance and Mitigation Project Interim Strategy, there is no absolute constraint preventing further development. There is also available capacity at the Sidlesham Wastewater Treatment Works.

- 7.7. Bracklesham/East Wittering is a settlement hub. It has a range of facilities that make it an appropriate location for development, with the exception of a secondary school and any significant employment provision (and arguably this is a deteriorating position). Extensive evidence on these issues has been submitted in response to Matter 8, Issue 7. The Council is suggesting that it would be appropriate to increase the proposed housing number for Bracklesham/East Wittering to 180 dwellings.
- 7.8. Overall, and having regard to the updated housing supply position (see **appendix 4**) the existing transport evidence indicates that there is capacity to increase the housing provision figure by a total of 415 dwellings. This equates to 435 dwellings per annum to the end of the plan period. However, there are restrictions in terms of individual locations as to where this could be achieved. For example, Selsey and Southbourne are settlement hubs, but in the light of the housing numbers already allocated to them (150 and 300 dwellings respectively) there is not, within the context of the existing transport assessment, any spare capacity to allocate additional development in these locations.
- 7.9. On this basis the Council considers it would be possible to increase the allocation within the plan period for West of Chichester by 250 dwellings, Bracklesham/East Wittering by 80 dwellings and Chichester City (within or adjacent to the city) by 85 dwellings.
- 7.10. It should be noted that any increase in housing provision would need to be tested through the Sustainability Appraisal and Habitat Regulations Assessment processes, although these are not expected to be 'showstoppers'.
- 7.11. A sound plan with this increase in housing provision would enable:
- The substantial investment needed to bring forward the strategic sites
  - Development to be delivered in accordance with the plan-led system
  - The implementation of the CIL charging schedule to assist with funding the major investment needed in infrastructure
  - Certainty for the parish housing figures which will allow for sites to be identified for short term housing provision.

## Appendices

Appendix 1 – Timeline – Local Plan preparation v assessed housing requirements

Appendix 2 – Local Plan Key Policies – Preferred Approach – Explanation and Justification of Housing Numbers (Note accompanying March 2013 Cabinet Report)

Appendix 3 – Request for additional information on future development scenarios (WSCC)

Appendix 4 – Transport Modelling Maximum Housing Scenario – Remaining Overall Highways Capacity

Appendix 5 – Capacity at Wastewater Treatment Works in Chichester Local Plan Area

Appendix 6 – Analysis of the Development Potential of Sites Identified in the Strategic Housing Land Availability Assessment (SHLAA)

Appendix 7 – Reasons for Chichester District Council's Objections to Increasing Housing Provision at the Westhampnett/NE Chichester Strategic Development Location

**Timeline – Local Plan preparation v assessed housing requirements**

**APPENDIX 1**

<b><i>Date</i></b>	<b><i>Stage of Local Plan preparation</i></b>	<b><i>Proposed Plan target</i></b>	<b><i>District housing provision (assuming 70 dpa for SDNP)</i></b>	<b><i>Assessed OAN for District</i></b>	<b><i>Source for OAN</i></b>	<b><i>Local Plan v OAN</i></b>
Mar 2013	Local Plan Preferred Approach consultation	395 dpa + 258 dwellings outstanding shortfall (equivalent to 410 dpa for Plan period)	480 dpa	438 – 497 dpa (468 dpa mid-point)	Coastal West Sussex SHMA update (Nov 2012)	Plan target towards top of OAN range
July 2013	Further Consultation on LP Preferred Approach	410 dpa	480 dpa	480 – 590 dpa (535 dpa mid-point)	Housing Study (Duty to Cooperate) (May 2013)	Plan target meets lower end of OAN range
Nov 2013	Local Plan Pre-Submission consultation	410 dpa	480 dpa	529 dpa	Updated Demographic Projections for Sussex Coast HMA (published Aug 2013)	Plan target falls 50 dpa below estimated OAN
May 2014	Submission of Local Plan	410 dpa	480 dpa	530 – 650 dpa (590 dpa mid-point)	Assessment of Housing Development Needs Study (April 2014)	Plan target falls 50 dpa below lower end of OAN range and 110 dpa below mid-point of OAN range
Oct 2014	Local Plan examination hearings	410 dpa	480 dpa	560 – 575 dpa	Review of OAN in light of 2014 SNPP (Aug 2014)	Plan target falls 80-95 dpa below OAN

## **Local Plan Key Policies – Preferred Approach Explanation and Justification of Housing Numbers**

### **Policy Requirements**

The NPPF states that local planning authorities should prepare new Local Plans on the basis that objectively assessed development needs (both for housing and other types of development) should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the document as a whole. The starting point is that Local Plans should meet the full requirements for market and affordable housing in their housing market area. Any under provision is expected to be addressed through collaborative working with neighbouring authorities, and this is included within the tests of soundness for the plan. The NPPF also indicates that Strategic Housing Market Assessments (SHMAs) should be undertaken as the basis for assessing housing requirements across housing market areas.

### **Evidence on Housing Requirements**

#### **Coastal West Sussex SHMA Update 2012**

The Coastal West Sussex SHMA Update 2012 was commissioned by the four coastal districts, meeting the requirements in the NPPF to assess future housing requirements across the Housing Market Area.

The SHMA identifies a range of housing requirements, depending on the assumptions made about demographic projections, future levels of net in-migration and economic forecasts. In terms of demographic/migration led projections, the SHMA indicates a housing requirement for the district as a whole of between 438 - 497 homes/year, with the lower figure based on the 10-year migration trend and the upper figure on the more recent 5-year trend. The SHMA also looks at the relationship between housing numbers and employment growth (assuming existing commuting patterns continue). It suggests that a minimum of 367 homes/year would be needed simply to maintain current employment levels (zero employment growth). It also includes a projection based on economic forecasts for the district (provided by Experian), which indicates that a much higher housing figure of 750 homes/year could be needed in order to meet potential employment growth requirements.

#### **Affordable Housing Requirements**

The SHMA Update 2012 also provides an assessment of affordable housing requirements based on an assessment of local housing need using the Basic Needs Assessment Model set out in Government Practice Guidance. This identifies a net housing need for 1,782 affordable homes across the District (including the National Park) over the 2011-2016 period. This equates to an average of 356 affordable

homes/year, based on providing housing to meet the needs of all households currently on the Housing Register, plus housing need expected to arise from newly forming households and existing households falling into need.

### **Sussex Coast Housing Duty to Cooperate Study 2013 (emerging findings)**

The Housing DTC Study has been commissioned by the four coastal districts, plus Brighton & Hove and Lewes as a follow-up to the SHMA Update 2012. It aims to assess the potential, capacity of the area to meet objectively assessed housing requirements taking account of infrastructure and environmental constraints and review potential options for addressing any identified housing shortfall.

The study is being undertaken by GL Hearn and is still in progress. A (confidential) Preliminary Report has recently been produced which, for each local authority area, assesses existing evidence on housing requirements in the context of land supply, development constraints and emerging Local Plan housing provision. For Chichester District, the emerging Study identifies housing requirements equivalent to between 480-590 homes per year, where the lower end of the range broadly aligns with the upper end of the demographic/migration led housing requirements in the SHMA, whilst the higher end reflects the potential for additional economic-driven demand. The Study indicates that existing infrastructure constraints, particularly those relating to wastewater treatment and highways, limit the scope for higher levels of development and the potential to bring forward further strategic sites in and around Chichester beyond those sites currently being considered.

### **Past Housing Completions**

The breakdown of housing completions in the Plan area and National Park area for the period 2001-2012 shows an average of around 350 dwellings/year in the Plan area and around 70 dwellings/year in the SDNP area. Over the period 2006-2012, the balance shifted slightly as completions in the Plan area fell to 333 dwellings/year, whereas the SDNP figure increased to 84 dwellings/year.

### **How do Local Plan housing numbers compare to identified housing requirements?**

The table below shows a comparison of the housing numbers proposed in the draft Local Plan set against the housing requirements indicated by background studies and other available evidence such as past completions.

The National Park Authority is not currently in a position to advise on the level of housing that will be identified in its forthcoming Local Plan. However, on the basis of recent trends in housing completions, it is reasonable to assume delivery of around 75 homes/year in the SDNP area of the District. On this basis, total housing delivery for the District as a whole (including the National Park) would average around 470 homes/year.

The table indicates that:

- The assumed figure of 470 homes/year for the District as a whole would fall midway within the SHMA requirements based on migration trends;



- It would be comparable, but slightly lower, than the previous South East Plan housing target for the District;
- It would fall towards the lower end of the range of housing requirements recommended in the Local Housing Requirements Study (2011);
- It would be likely to fall well short of delivering sufficient affordable housing to meet local needs;
- It would fall below the range of housing requirements set out in the emerging Housing Duty to Cooperate Study;
- It would be unlikely to be sufficient to support strong levels of employment growth as indicated by the SHMA economic forecasts;
- However, the proposed Local Plan housing numbers are significantly higher than recent levels of housing completions.

<b>Projection</b>	<b>Plan area housing (homes/year)</b>	<b>District housing (homes/year)</b>
Economic projection (SHMA)	< 600	750
Housing DTC Study (upper threshold)	515	590
LHRS 2011 (upper threshold)	450	525
5-year migration trend (SHMA)	422	497
LHRS 2011 (lower threshold)	400	450
<b>Proposed Local Plan housing target</b>	<b>395</b>	<b>(470)</b>
Former South East Plan housing target) / Housing DTC Study (lower threshold)	375	480
10-year migration trend (SHMA)	363	438
Average net completions 2001-12	350	421
Zero employment growth (SHMA)	292	367
Net affordable housing need (SHMA)	270 (AH only)	356 (AH only)

Overall the Local Plan housing numbers are sufficient to provide for the demographic/ migration led projections, based on a continuation of trends over the past decade (10-year migration trend). However, they provide limited flexibility to provide for increased levels of migration or higher levels of economic growth, and are likely to fall well short of providing sufficient affordable housing to meet identified local needs.

## **Assessment of Housing Capacity**

As set out above, the SHMA and other evidence indicate a wide range of potential housing requirements for the District according to different scenarios. To meet the NPPF requirements, the Local Plan should seek to meet objectively assessed housing needs as far as possible. At present, there is no guidance at the national

level on how to weigh up different assumptions on future housing requirements. It is ultimately a matter of judgment. However, it needs to be borne strongly in mind that the Government's agenda is to promote growth and its stated aim in abolishing top-down regional housing targets is to increase, not reduce, levels of housing development.

Through the Local Plan process, the Council is likely to come under pressure from the development industry to plan for higher housing numbers, based on arguments that the current housing numbers fail to meet projected requirements, based on the most recent (5-year) migration figures or the economic forecasts. Given the expected level of housing in the SDNP area, the figures for the District as a whole are also likely to fall below the previous SEP district figure. There may also be pressure for the Plan area to accommodate additional housing under the Duty to Cooperate, due to unmet needs in the National Park and/or surrounding districts.

The Council will therefore need to justify the Local Plan housing numbers as representing a realistic assessment of potential capacity to deliver housing across the Plan area. This places a strong emphasis on the need for very robust evidence on the various development constraints affecting the Plan area. These comprise:

- Infrastructure capacity and constraints, in particular relating to wastewater treatment, roads and transport; and
- Environmental constraints – avoiding flood risk areas, protecting environmental designations, landscape quality and settlement character.

A further important aspect in assessing housing capacity is evidence on the availability and suitability of development sites. The NPPF states that local authorities should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

### **Key Development Constraints**

The potential for housing delivery in the Plan area is limited due to environmental and infrastructure constraints. A summary of the key constraints is provided below.

***Wastewater Treatment Capacity*** - The most critical impacts on development relate to wastewater treatment capacity, resulting from constraints both in terms of the physical capacity (headroom) of wastewater treatment works and requirements relating to environmental/ water quality standards. The most significant constraints relate to the Apuldram WwTW, which serves Chichester City and discharges into Chichester Harbour. There is no potential to expand capacity at Apuldram WwTW and in addition the Environment Agency has advised that its existing wastewater headroom should not be used until a solution is found to the issue of groundwater infiltration. The other treatment works serving the Plan Area also have limited development headroom to varying degrees and/or are subject to water quality constraints.

The Wastewater Treatment Options Study for Chichester District in 2010 considered alternative options to increase wastewater capacity to accommodate future

development needs. Following its recommendations, the preferred solution is to upgrade Tangmere WwTW to provide expanded capacity to accommodate an additional 3,000 homes. This would enable strategic growth in the south of the District. Work undertaken by the Wastewater Quality Group has demonstrated that an upgrade to the Tangmere WwTW sufficient to meet Local Plan development requirements is feasible and viable, however the proposed upgrade is subject to Ofwat approval for the scheme through the Periodic Review in 2014. Assuming that Ofwat approval is secured, the Tangmere WwTW upgrade could be operational from 2019.

The wastewater capacity constraints effectively impose a ceiling on the level of new housing that can be provided in the first part of the Plan period (up to 2019), as it prevents delivery of strategic housing sites in the Chichester City/Tangmere area until solutions to the wastewater constraints can be implemented.

**Traffic congestion/highways capacity** – Development is also constrained by issues of traffic congestion in and around Chichester City, including the junctions on the A27 Bypass. Following the 2010 Spending Review, Government proposals to improve the A27 Bypass have been suspended and it is therefore not possible to rely on a publicly funded solution coming forward during the Plan period.

Planning and transport policy requires that new housing should provide adequate mitigation to address traffic impacts generated directly by the development, but does not require development to address pre-existing problems of congestion. In addition, the NPPF states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are judged to be severe (which is not defined).

The Chichester Transport Study has modelled levels of congestion and delays across the highways network in the period up to 2031. It indicates that, even without additional new development, there is likely to be just over 20% growth in trip rates by 2031 compared to the 2009 base. This situation will be accentuated by further new housing development, unless mitigation is provided.

Through joint work involving the Council, WSCC, the Highways Agency and the major development promoters, a package of coordinated measures has been identified that will address the traffic impacts directly generated by proposed housing development and thereby meet the requirements of planning policy. Developer contributions will be used to fund proposed improvements to the six junctions on the A27 Chichester Bypass, linked to further measures to reduce congestion and promote sustainable modes of travel in and around Chichester City. Phasing of development in and around the City will need to be coordinated in conjunction with delivery of these proposed transport improvements.

Since planning policy only requires mitigation of the direct impacts of development on the highways network and this can be potentially achieved, the issues of road capacity and congestion do not impose a specific limit on housing development in the Local Plan. However, traffic issues have influenced the distribution of housing proposed in the Plan, in particular the decision to reduce development in the Manhood Peninsula to a minimum.

**Impacts of recreational disturbance on birds at Chichester and Pagham Harbours** – Both Chichester Harbour and Pagham Harbour are designated SPA/Ramsar sites. Evidence from the Solent Recreation and Disturbance Project (and from visitor surveys at both Chichester and Pagham Harbours) indicates potentially damaging impacts on over-wintering birds resulting from recreational activity. These impacts could be increased by further major development.

The Council has adopted an Interim Policy Statement on ‘Development & Disturbance of Birds in Chichester and Langstone Harbours Special Protection Area’. This defines a “zone of influence” that extends to 7km from the Harbour foreshore, covering all the South of the District, except Selsey and a narrow area east of Tangmere. Within this area, all proposals involving developments of 6+ dwellings may require Appropriate Assessment to assess the potential recreational impacts arising from proposed housing. Planning permission will be granted only where harm can be avoided or mitigated.

It is anticipated that development proposals will need to provide or contribute towards mitigation/ avoidance measures, subject to the outcomes of an Appropriate Assessment. This will apply particularly to the strategic development locations and sites close to the harbours. Measures may include access management at the Harbours such as increased wardening, and creation/ enhancement of appropriate green infrastructure to improve local access in less sensitive areas and provide a similar quality experience to that found at the Harbours.

As with traffic impacts, it is not clear that issues of recreational disturbance impose a specific limit on the level of new housing in the Plan area. The acceptability of development proposals will be judged through Appropriate Assessment and in most locations, it should be possible to mitigate the potential development impacts. However, these issues do significantly limit the potential for locating housing development close to the Harbours, which has been a factor in ruling out potential strategic development south west of the City or in the Fishbourne area, and limiting the level of development proposed at Southbourne.

**Other constraints** – Several other constraints have also been significant in affecting the overall strategy and locations for development. These include flood risk issues (particularly around Selsey) and landscape sensitivity (particularly close to the National Park and AONB boundaries). Concerns over noise issues are particularly relevant in assessing potential for strategic development north-east of Chichester City, due to the area’s proximity to the Goodwood Aerodrome/Motor Circuit.

However, whilst these constraints limit or rule out development in specific locations, it is not considered that they impose an overall limit on the level of housing that can be provided in the Plan area.

### **Assessment of Land Availability and Housing Potential**

A further important aspect in assessing housing capacity is evidence on the availability and suitability of development sites. The NPPF states that local authorities should prepare a Strategic Housing Land Availability Assessment

(SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

The Council undertook a SHLAA (covering the whole of Chichester District) which was published in March 2010. The SHLAA findings on the potential availability of suitable housing sites was one of the inputs used to inform the parish housing numbers (see below). Council officers are currently updating the SHLAA for the Plan area and an updated SHLAA report will be available shortly.

In addition to the SHLAA work on identifying potential housing sites, Council officers have also engaged in regular and ongoing discussions with the promoters of potential large strategic sites. Together with previous Local Plan consultations (Focus on Strategic Growth Options, Jan 2010 and Housing Numbers and Locations, Aug 2011), this has been used to inform the larger strategic allocations identified in the draft Plan (see below).

## **Local Plan Housing Provision**

The draft Local Plan makes provision for 6,973 homes over the period 2012-2029. This is equivalent to 395 homes/year, plus a further 264 homes to meet the outstanding shortfall (2006-2012) against the previous South East Plan target.

As explained above, the housing numbers have been derived through a detailed assessment of potential capacity for housing delivery across the Local Plan area over the Plan period, taking account of potential land availability and identified environmental and infrastructure constraints.

The housing provision figure comprises several different elements:

1. Planning permissions and identified housing sites (1,984 homes) – This includes existing housing permissions at 1 April 2012, together with other identified sites such as housing land identified in the Sites at Chichester City North Development Brief and identified SHLAA sites where these are within settlement boundaries.
2. Small sites windfall allowance (664 homes) – This allowance is included to account for housing development projected to come forward on small sites of less than 6 dwellings, which it is not realistically possible to allocate in advance.
3. Strategic allocations (3,550 homes) – These comprise larger housing and mixed use sites (at least 100+ homes) which are (or are intended to be) specifically allocated in the Local Plan Key Policies document. They include four large strategic locations in the Chichester-Tangmere area (Shopwyke, West of Chichester, Westhampnett and Tangmere) and three smaller locations (yet to be identified) at the other settlement hubs (Southbourne, Selsey and East Wittering/Bracklesham).
4. Parish housing sites (775 homes) – These comprise sites suitable for small scale housing development (less than 100 homes) to address the needs of local

communities. The Local Plan Key Policies document does not identify specific sites, but provides indicative housing numbers for each parish. It is envisaged that suitable sites should be identified primarily through neighbourhood plans where these are prepared by parish councils, or alternatively in a Site Allocations DPD to be prepared by the Council.

The section below sets out how housing numbers have been derived for the major strategic sites and parish housing sites.

## **Large Strategic Allocations (Chichester City-Tangmere area)**

### ***Shopwyke***

Shopwyke is a relatively well contained site of low landscape value, part of which comprises old mineral workings. It is considered that the site would have less direct impact on the character of the City than other potential locations and there has been a general degree of acceptance to the principle of development. The majority of the proposed strategic allocation comprises the Shopwyke Lakes planning application, which is currently being considered by the Council. If permitted, the Environment Agency has accepted that the initial phases of development could commence before 2019, utilising existing available headroom at Tangmere WwTW, although it is likely that later phases of development would have to be phased to follow the proposed WwTW expansion in 2019.

### ***West of Chichester***

The site is directly adjacent to the edge of the City, west of Centurion Way. It has been promoted as a large strategic allocation with potential to deliver up to 1,600 homes. The promoters are putting forward development in two phases – Phase 1 of 500-700 homes on the north of the site accessing Broyle Road, followed by Phase 2 which would increase the development to 1,600 homes, including an access from the south onto Westgate.

In terms of most criteria, officers consider that this site scores best in terms of sustainability and potential as an urban extension to the City. It is directly adjacent to the City and provides good access by sustainable modes of travel, avoiding the A27. It offers potential for new employment land at the southern end of the site, substantial greenspace, and other facilities that would benefit the City.

The main potential obstacles to development are wastewater due to the restrictions at Apuldram WwTW, together with concerns over recreational disturbance due to the proximity of the south of the site to Chichester Harbour. The promoters claim they could fund a direct wastewater connection to Tangmere WwTW at a cost of no more than £5m. On recreational disturbance, they argue that they will provide a high percentage of greenspace (50%+ of the site) and will be able to satisfy any mitigation measures that may be required by Natural England.

Given the inherent advantages of the site and assuming potential to overcome the constraints, officers favour this site as a strategic location for future expansion of the City. Therefore, we consider that we should allocate both Phase 1 and 2 in the Plan,

whilst accepting that only a portion of Phase 2 is likely to be built out by 2029. Assuming commencement of development is phased to coincide with the expansion of the Tangmere WwTW in 2019, it is considered that potential delivery is likely to be limited by build rates to around 1,000 homes during the Plan period, with development continuing beyond the Plan period.

### ***Westhampnett (North East of Chichester)***

This site was originally promoted as a strategic development area with potential for up to 1,500 homes between the City boundary and Goodwood Motor Circuit/ Aerodrome. However, a large part of the site falls within the floodplain of the River Lavant and is unsuitable for development, with the floodplain effectively separating most of the developable area from the City. In addition, much of the remaining site area is subject to noise impacts associated with the Aerodrome and Motor Circuit. The area suitable for residential development is therefore now considered to be limited to the south of the site on either side of Madgwick Lane.

The promoters have undertaken noise assessment studies to define the developable area and these have been reviewed by the Council. Discussions are ongoing and have not yet reached clear agreement. The promoters still claim that they could accommodate 800-1,000 homes, but this looks optimistic. There is also the issue of the development occupying the gap between Westhampnett village and the City.

Council officers consider that an upper limit of around 500 homes is realistic. This would be phased to occur after 2019 following expansion of the Tangmere WwTW.

Following the reduction in the developable area, it is now considered that the development would work better if planned as an extension to Westhampnett village rather than an extension of the City as originally proposed. As such, it could be planned to integrate with and deliver community facilities for Westhampnett village.

### ***Tangmere***

The concept of expanding Tangmere has been proposed for a number of years. There is considerable land with development potential to the west and south of the village. A master-planned strategic expansion would offer the opportunity to deliver improved infrastructure and facilities which would benefit the village as a whole. Development at Tangmere would also provide relatively cheaper market housing for local households compared to Chichester City.

Proposals for a development of at least 1,500 homes were originally promoted by a consortium of the three main landowners. In terms of site area, the land identified offers scope to accommodate a much higher figure. However, irrespective of the scale of development allocated, the current capacity restrictions at Tangmere WwTW would restrict the amount of housing that can realistically be delivered in the period to 2029.

The three main landowners are now working separately. This presents complications in terms of coordinating and master-planning development. However, the potential to deliver large scale housing development at Tangmere remains.

A key issue is the scale of development needed to deliver infrastructure and facilities for the village. Officers consider that planning for around 1,000 homes is reasonable. A smaller number would risk the development being unable to afford substantial improvements to improvements and facilities in the village. This could result in a continuation of the piecemeal housing expansion that the village has experienced in the past. The exact numbers and location of development will be refined further through discussion with the promoters and through the master-planning process.

Development needs to be carefully phased to enable good integration with the existing village and community. Assuming development is phased to commence in conjunction with the expansion/upgrading of the Tangmere WwTW in 2019, we estimate that there is potential to deliver up to around 1,000 homes at Tangmere over the Plan period.

### **Other Strategic Allocations (Southbourne, Selsey and East Wittering/Bracklesham)**

These settlement hubs were included as part of the Parish Housing Numbers consultation in Autumn 2012, and it was assumed that sites would be delivered through the neighbourhood plan process as for other parish housing sites. However, following informal discussions on the draft Plan, the Planning Inspectorate expressed concerns about the possibility of a continuing housing supply shortfall in the early part of the Plan period, due to the Plan's high reliance on strategic sites that are constrained by the wastewater restrictions affecting the Apuldram and Tangmere treatment plants.

To address this, it is now proposed to allocate medium scale strategic sites at Southbourne, Selsey and East Wittering/Bracklesham in the Local Plan Key Policies document, in order to promote the earliest possible delivery of housing at these locations where there is existing available wastewater capacity. Specific sites have not been identified in this draft of the Plan document, but Council officers have met with the relevant parish councils. Both Southbourne and Selsey Councils are now actively working to identify housing sites through early adoption of a neighbourhood plan. The Council is also looking to work with the parishes in the East Wittering area to identify suitable site(s).

Discussion of the housing numbers for Southbourne, Selsey and East Wittering/Bracklesham is included in the section below on Parish Housing Sites.

### **Parish Housing Sites**

In addition to the strategic sites allocations, the Local Plan makes provision for small scale housing to address the needs of local communities. It is envisaged that suitable housing sites should be identified primarily through neighbourhood plans prepared by the relevant parish councils. Housing numbers are identified in the Local Plan in accordance with the defined settlement hierarchy, with new housing directed primarily towards larger, more sustainable settlements.



The proposed parish housing numbers set out in the Local Plan are based on detailed assessment of the housing potential and capacity of individual parishes and settlements. This analysis has considered the size and character of individual settlements, levels of local housing need, the availability of everyday services and facilities, and levels of accessibility and public transport. It has also taken account of known development constraints and potential sites in each parish (drawing on the Council's Strategic Housing Land Availability Assessment which is currently being updated). Explanation and justification of the housing numbers identified for each parish is included in the Parish/Settlement Profiles (forthcoming).

In Autumn 2012, the Council undertook informal consultation with all the parish councils on proposed parish housing numbers to be included in the Local Plan. The housing numbers were expressed as an indicative range for each parish (e.g 50-100 homes). In total, the indicative parish numbers would deliver a range of 1,520-2,790 homes in the Plan Area (South) and 215-375 homes in the Plan Area (North), giving a range of 1,735-3,165 homes across the Plan area as a whole.

In response to the consultation, parish councils raised a range of issues covering matters such as development constraints, infrastructure, and the timing and phasing of housing delivery. In response to these comments, and further representations by Councillors, the parish housing numbers have been substantially reduced in the Local Plan. In summary, the main changes are:

- The Local Plan is now proposing to allocate strategic sites at Southbourne, Selsey and East Wittering/Bracklesham, rather than leaving this to neighbourhood plans or a future Site Allocations document (see above).
- The proposed housing numbers for East Wittering/ Bracklesham have been reduced substantially from 350-600 homes to 100 homes. This reflects Parish Council and Member concerns over the proposed scale of development on the Manhood Peninsula, primarily relating to transport constraints, potential environmental impacts and concerns over lack of local employment opportunities.
- The parish housing numbers for Chichester City have been reduced, as the NHS Trust land identified in the Sites at Chichester City North Development Brief is now included in the housing supply figures.
- The housing numbers for Southbourne Parish have been split between the strategic allocation at Southbourne village (300 homes) and a further 50 homes to be identified at other settlements in the Parish.
- In all the other parishes, the minimum figure previously proposed in the housing range has been set as an indicative target. For example, for Birdham the Local Plan now proposes an indicative figure of 50 homes (rather than 50-100 homes as suggested in the Parish Housing Numbers consultation).

The net effect of these adjustments has been to reduce the amount of housing proposed on parish housing sites to a total of just 775 homes, plus a further 550 homes proposed as strategic allocations at the three settlement hubs of Southbourne, Selsey and East Wittering/Bracklesham.

## **Phasing and Delivery of Housing Development**

### ***Pre-2019***

In terms of housing delivery and phasing, the Plan period can be divided into two periods. Prior to 2019 there is very limited flexibility in where housing can be provided due to the current restrictions at Apuldram WwTW and the limited capacity at Tangmere WwTW. These restrictions effectively delay the release of the large strategic sites identified in the Chichester-Tangmere area (with the possible exception of Shopwyke).

The wastewater constraints largely dictate the strategy in the early part of the Plan period, which is to locate as much development as possible towards areas where there is available wastewater capacity (i.e the Bournes area and Manhood Peninsula). However, as previously noted, there is relatively limited scope for development in these areas, due to other constraints (e.g traffic congestion and recreational disturbance). Also, given the lead times involved in identifying and delivering sites, it is probably unrealistic to assume that the allocated sites at the settlement hubs will be built out by 2019.

It should also be noted that there is already substantial committed housing development at Chichester City (Graylingwell, Roussillon Barracks, and land identified in the Chichester City North Development Brief), plus potential to deliver some or all the development at Shopwyke.

### ***Post-2019***

Assuming expansion of Tangmere WwTW is completed in 2019/20, this provides much more flexibility in the second part of the Plan period. It will allow the delivery of the remaining large strategic allocations identified in the Chichester-Tangmere area. The key factor limiting the level of housing provision post-2019 is likely to be the influence of the housing market (and to some degree infrastructure requirements) on house-building rates on the major sites. The Local Plan assumes that delivery of around 100 homes per year is potentially achievable on the strategic allocations. Therefore, it is considered that up to 2,500 homes can be provided on the three large strategic sites - West of Chichester (around 1,000 homes), Westhampnett (around 500 homes) and Tangmere (up to 1,000 homes). However, these delivery rates are likely to require a strong housing market.

**Chichester Local Plan 2014-29**

**Request for additional information on future development scenarios**

**Response by officers on behalf of West Sussex County Council**

**Introduction**

- 1. The examination of the Chichester Local Plan is currently underway. During the examination, the Inspector indicated that, to date, she has not seen up-to-date evidence to justify the District Council's proposed housing figure of 410 homes per annum over the 15 year plan period in the Plan area. The Inspector asked whether the Council wished to initiate an audit of the evidence to demonstrate how constraints had led it to arrive at the 410 figure. After due consideration, the Council agreed that it would initiate an audit and review of the evidence and would attempt to carry this out as quickly as possible.**
- 2. As part of the review of evidence, CDC has requested advice from the County Council as local highway authority and local education authority on potentially increasing the housing target. This response has been prepared by officers on behalf of West Sussex County Council.**

**Highway Infrastructure**

- 3. The Chichester Transport Study of Strategic Development Options and Sustainable Transport Measures (Jacobs, 2013) tested a range of possible development scenarios using the Chichester Area Transport Model. The scenarios tested are listed below and included a "Maximum Housing Target (440 homes/yr)" for the south of the District. The study identified a range of capacity issues and mitigation measures including smarter choices initiatives which would need to be implemented in order to ensure that the cumulative impact of development on the transport network would not be severe.**
- 4. It should be noted that as the Maximum Housing Target and Local Plan Preferred Approach were prepared at separate points in time, they build on a different understanding of existing commitments; i.e. permitted development. Therefore, it is necessary to take existing commitments into account when calculating the cumulative level of housing tested using the CATM. Taking these into account for the Maximum Housing Target scenario, this equates to a total number of homes tested in the Plan area of 7388 dwellings or 435 homes/yr.**

	<b>Maximum Housing Target (440 homes/yr)</b>	<b>Allowance for windfall housing</b>	<b>Maximum tested minus windfall</b>	<b>Local Plan Preferred Approach (410 homes/yr)</b>	<b>Additional capacity tested over Local Plan Preferred Approach *</b>
<b>Shopwyke</b>	<b>500</b>	<b>0</b>	<b>500</b>	<b>500</b>	<b>0</b>
<b>West of Chichester</b>	<b>1350</b>	<b>0</b>	<b>1350</b>	<b>1000</b>	<b>+350</b>
<b>Westhampnett / NE Chichester</b>	<b>1200</b>	<b>0</b>	<b>1200</b>	<b>500</b>	<b>+700</b>
<b>Tangmere</b>	<b>1350</b>	<b>0</b>	<b>1350</b>	<b>1000</b>	<b>+350</b>
<b>Chichester City (built-up area)</b>	<b>420</b>	<b>185</b>	<b>235</b>	<b>150</b>	<b>+85</b>
<b>Southbourne (parish)</b>	<b>400</b>	<b>50</b>	<b>350</b>	<b>350</b>	<b>0</b>
<b>East Wittering/ Bracklesham</b>	<b>340</b>	<b>30</b>	<b>310</b>	<b>100</b>	<b>+210</b>
<b>Selsey</b>	<b>240</b>	<b>90</b>	<b>150</b>	<b>150</b>	<b>0</b>
<b>Tangmere (non-strategic)</b>	<b>100</b>	<b>20</b>	<b>80</b>	<b>0</b>	<b>+80</b>
<b>Elsewhere in South of Plan area</b>	<b>544</b>	<b>169</b>	<b>375</b>	<b>375</b>	<b>0</b>
<b>North of Plan area</b>	<b>180</b>	<b>120</b>	<b>60</b>	<b>200</b>	<b>0</b>

**\* These figures do not take existing commitments into account and should be taken cumulatively.**

- 5. Following the Study, County Council officers provided a position statement which outlined that on the basis of a technical assessment, the County Council, as local highway authority, consider that the Study provides sufficient evidence that, if a package of mitigation measures including A27 junction improvements and smarter choices initiatives are implemented, then the cumulative impacts of development on the transport system would not be severe. Therefore, the package of mitigation measures identified in the Study are considered sufficient to**

**mitigate the impacts of the development scenarios listed above and no further technical evidence is required to support a development strategy in the Local Plan which is consistent with these assumptions.**

- 6. In general, the "Maximum Housing Target" scenario, which is the only scenario that exceeds the Local Plan Preferred Approach, proposed to allocate additional housing on the Strategic Development Locations at NE Chichester (Westhampnett), Tangmere and West of Chichester City. However, it is recognised that there are potentially alternative development strategies which could help to deliver a higher level of housing than proposed in the Local Plan Preferred Approach. As some of the possibilities have not been fully assessed before, further technical work would be required to assess the cumulative impacts of development and where necessary, identify suitable mitigation measures. This work would take several months to complete and would need to be locally funded.**
- 7. Following the audit of sites undertaken at the request of the Planning Inspector, CDC has specifically requested the County Council's technical views on the possibility of increasing the housing allocations for Southbourne (specifically including sites north of the railway line) and the Manhood Peninsula.**
- 8. It should be recognised that additional development in the Southbourne area is likely to cause local concern. However, the County Council has been engaged in early pre-application discussions with promoters of sites in Southbourne, including sites north of the railway line. Although sites south of the railway line are preferred as they will suffer less from the severance effects of the railway line, the County Council, as local highway authority, does not consider there are any matters of principle which should prevent development from coming forward on sites north of the railway line, subject to resolving issues associated with the Inlands Road level crossing which are a concern for Network Rail but are unlikely to be insurmountable.**
- 9. The Jacobs Study assessed a possible housing allocation (including windfall allowance) for Southbourne of 400 homes and there is sufficient evidence to justify a housing allocation at this level. However, if it were proposed to increase the housing allocation for Southbourne above 400 homes, this would not have been assessed cumulatively with other planned development in the District and is therefore not supported by sufficient technical evidence to justify its inclusion in the Local Plan. Given the potential scale of this site allocation, it would be preferable to assess the sites cumulatively alongside other strategic housing allocations in the Local Plan. Further technical work would be required in order to be satisfied that, alongside other planned development in the area, a housing allocation above 400 homes at Southbourne would not lead to severe impacts on the transport**

**network that cannot be mitigated. As there is potential for cross-boundary impacts in Hampshire, any proposal to increase the housing allocation at Southbourne should also be discussed with Hampshire County Council as local highway authority.**

- 10. In relation to the Manhood Peninsula, the Maximum Housing Target included a possible allocation (including windfall allowance) of 340 homes to East Wittering and Bracklesham which exceeds the proposed allocation in the Submission Draft Chichester Local Plan. It is recognised that development in this area does suffer from severance issues associated with the A27 and an increase in the housing allocation is highly likely to cause local concern. However, the County Council consider that if the package of mitigation measures identified in the Jacobs Study, which includes improvements to the A27 junctions (or similar alternatives) that should be implemented in full, then the Study provides sufficient evidence that the cumulative impacts of development can be successfully mitigated without severe impacts on the transport network. If housing allocations on the Manhood Peninsula were to exceed the levels tested in the Maximum Housing Target scenario listed above, this would not be supported by sufficient technical evidence to justify inclusion in the Local Plan. Further technical work would be required in order to be satisfied that, alongside other planned development in the area, these housing allocations would not lead to severe impacts on the transport network that cannot be mitigated.**

#### **Education Infrastructure**

- 11. The County Council has previously identified education infrastructure requirements to support housing development identified in the Local Plan. Additional housing development may create the need for additional primary, secondary, early education, youth and Special Education Needs (SEN) infrastructure.**
- 12. In Southbourne, up to 500 new dwellings (150 above Local Plan total) could be accommodated by expanding existing primary schools, but over this amount may require an additional 1FE primary school. Contributions would be required towards expansion of secondary school provision. Additional development in this area may also strengthen the case for the need for a new secondary school in Chichester within the Plan period.**
- 13. If the housing allocations on the Manhood Peninsula were to increase in line with the Maximum Housing Target scenario, additional contributions towards the expansion of existing primary schools in the locality would be required.**
- 14. It should also be noted that if the housing allocations on the Strategic Development Locations were to be increased, this may also change the County Council's requirements for education infrastructure. If this is likely to occur during the course of the**

**examination, then please discuss this with the County Council at the earliest opportunity.**

**Strategic Planning  
West Sussex County Council  
7<sup>th</sup> November 2014**

**Transport Modelling Maximum Housing Scenario - Remaining overall highways capacity**

Note: This calculation does not include any assumptions about distribution of housing and highways capacity across Local Plan area.

	Net homes
Maximum Housing scenario tested for Plan area 2011-2029	8,100
Net housing completions 2011-14	820
Remaining highways capacity available 2014-2029	7,280

Total projected supply in housing trajectory 2014-2029 <sup>1</sup>	
Planning permissions & identified housing sites (Oct 2014)	3,107
Small sites windfall allowance	584
Remaining housing to be provided through the Local Plan	
- Large strategic allocations	2,500
- Allocations at settlement hubs	280
- Parish housing sites	396
Total projected housing supply 2014-2029	6,867
Additional highways capacity available 2014-2029	413

<sup>1</sup> See following page for explanation of total projected housing supply

**Proposed adjustment to Local Plan housing figure to meet available highways capacity identified through transport modelling**

Existing Local Plan housing provision 2012-2029	6,973
<i>Equivalent homes/year (17 years)</i>	<i>410</i>
Proposed additional housing to be added to Local Plan figure	415
Adjusted Local Plan housing provision 2012-2029	7,388
<i>Equivalent homes/year (17 years)</i>	<i>435</i>



**Local Plan Housing Supply Position - Year to Year Comparison since 2012**

	<b>Oct 2012</b>	<b>Oct 2013</b>	<b>Oct 2014</b>
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***Net housing completions***

Cumulative net housing completions (since 1 April 2012)	0	307	509
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***Existing identified housing supply***

Realistic commitments on sites of 6 or more dwellings	1,468	1,380	2,321
Further large sites expected to come forward	130	884	444
Other SHLAA sites expected to come forward	196	162	180
Small sites (< 6 dwellings)	190	161	162
<b><i>Total identified housing supply</i></b>	<b><i>1,984</i></b>	<b><i>2,587</i></b>	<b><i>3,107</i></b>
Small site windfall allowance	664	618	584
<b><i>Projected existing housing supply</i></b>	<b><i>2,648</i></b>	<b><i>3,205</i></b>	<b><i>3,691</i></b>

***Further housing identified in Local Plan***

Large strategic development locations	3,000	2,500	2,500
Settlement hubs	550	450	280
Parish housing sites	775	671	396
<b><i>Total additional Local Plan housing</i></b>	<b><i>4,325</i></b>	<b><i>3,621</i></b>	<b><i>3,176</i></b>

***Total projected housing supply***

<b><i>Total projected housing supply 2014-2029</i></b>	<b><i>6,973</i></b>	<b><i>6,826</i></b>	<b><i>6,867</i></b>
<b><i>Total housing 2012-2029 (including housing completions)</i></b>	<b><i>6,973</i></b>	<b><i>7,133</i></b>	<b><i>7,376</i></b>

## Capacity at Wastewater Treatment Works in the Chichester Local Plan Area

	<i>Remaining capacity (dwellings)<sup>2</sup></i>
Bosham	389
Kirdford	0
Loxwood	66
Pagham	625
Sidlesham	695
Tangmere	0
Thornham	1524
Wisborough Green	198
Lavant <sup>3</sup>	0
Apuldram <sup>4</sup>	251

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<sup>2</sup> Updated to take account of planning permissions up to 31<sup>st</sup> March 2014.

<sup>3</sup> Although the dry weather flow calculation technically identifies some capacity at Lavant, the Environment Agency has confirmed it would object to any proposal for development to drain to this wastewater treatment works.

<sup>4</sup> The Chichester District Council Cabinet has resolved that the remaining capacity in the Apuldram catchment should be reserved to enable continued development on brownfield sites within the catchment.

### Reasons for Chichester District Council's Objections to Increasing Housing Provision at Westhampnett/NE Chichester Strategic Development Location

#### 1. Introduction

- 1.1 This appendix provides a detailed justification of the Council's views regarding the development potential within the Westhampnett/North East Chichester Strategic Development Location (SDL), which Policy 17 of the Local Plan proposes to allocate for 500 homes. It responds to the statements submitted by Nexus Planning on behalf of Commercial Estates Group, D.C Heaver and Eurequity Ltd (Representor Ref: 710715) which argue for a substantially increased allocation of up to 1,000 homes, involving development on land to the north of Madgwick Lane, between the River Lavant floodplain and the Goodwood Motor Circuit/Aerodrome.
- 1.2 Appendix 1 of Further Statement Matter 7 (REP-710715-004) submitted by the site promoters presents an indicative masterplan for a proposed development of up to 1,000 homes, based on work undertaken by design consultants, ADAM Urbanism. This includes development proposed on land north of Madgwick Lane, which it is assumed would accommodate up to 500 homes, in addition to the 500 homes which the Council and promoters already agree could be provided between Stane Street and Madgwick Lane and west of the River Lavant.
- 1.3 The Council accepts that housing development on the land to the north of Madgwick Lane would be physically achievable, but considers that it is not a sustainable or desirable location for residential development due to a combination of factors. These include:
  - The impact of noise generated by the neighbouring Motor Circuit/Aerodrome and potential implications of this in affecting the quality of life of the residents of any new development;
  - The visual impact of development in this location, particularly in terms of the landscape setting of Chichester city and views from The Trundle and other key viewpoints within the National Park;
  - Following from the need to mitigate the landscape and noise impacts described above, the location and urban form of the proposed development would effectively create a free-standing 'island' of residential development, physically separate from the existing built areas of Chichester and Westhampnett and poorly related to both settlements.

1.4 For these reasons, the Council opposes development on the land to the north of Madgwick Lane. Further discussion of the Council's concerns is set out in the following sections.

## **2. Noise impacts**

2.1 The potential for residential development on parts of the SDL, including much of the land north of Madgwick Lane, is constrained by the effects of noise impacts related to the operation of the neighbouring Goodwood Motor Circuit and Aerodrome. The NPPF (paragraphs 109 and 123) seeks to prevent new development from being adversely affected by unacceptable noise pollution, potentially affecting health and quality of life as a result of new development. Local Plan Policy 17 requires that development should be designed to reduce the impact of noise associated with the Goodwood Motor Circuit/Aerodrome. The supporting text (paragraph 12.48) sets a general guideline that housing development should not be within 400m of the boundary of the Motor Circuit/Aerodrome, based on the existing noise controls currently in operation. It should be emphasised that these existing noise controls have been tailored to protect residents living at around 400m from the Motor Circuit.

2.2 The site promoters have commissioned a detailed noise assessment undertaken by consultants, Cole Jarman (CJ) which was appended to the promoters' Regulation 20 submission in January 2014. Appendix 2 of Further Statement Matter 7 (REP-710715-004) includes a statement on noise prepared by CJ. CJ have developed a noise constraints plan for the site based on their noise monitoring work (Figure 12-3750 NCP3), which would allow for development much closer to the Motor Circuit (in some places as close as 180m). In section 5.4 of their statement, CJ argue that implementation of a universal 400m noise buffer from the edge of the circuit is inappropriate, since the contour line of equal noise level is not a uniform distance from the edge of the circuit, but varies dramatically due to the influence of aircraft noise.

2.3 The Council has identified a number of concerns relating to the methodology and conclusions of the CJ Noise Assessment. The Council's Environmental Health officers have prepared a detailed response to the CJ Noise Assessment which is attached to this statement as Appendix A.

2.4 In general terms, the Council accepts the noise criteria selected by CJ in their noise monitoring work, which were agreed by the Council's Environmental Health section prior to the monitoring undertaken. However, the NPPG (ref 30-006-20140306) states that the subjective nature of noise means that there is no simple relationship between noise levels and the impact on those affected. This will depend on how various factors combine in any particular situation, including considerations such as the source and absolute level of the noise together with

the time of day it occurs, the number of noise events, and the frequency and pattern of occurrence of the noise, and the spectral content of the noise in terms of frequency.

- 2.5 The Council considers that the CJ Noise Assessment under-estimates the level of disturbance and annoyance likely to arise from noise generated by the Motor Circuit/Aerodrome. This is because the Noise Assessment fails to address, or gives insufficient weight to, a number of specific factors which are set out in detail in Appendix 1. The Council's main concerns are summarised below.
- 2.6 The Noise Assessment fails to adequately consider the combined impact of highly fluctuating noises from motor circuit and aviation noise which may result in higher levels than 55 dB for significant periods. Likewise, the general aviation noise level considered on a daily basis (other than in an Integrated Noise Model which includes summer time aggregated use for various runways to generate noise contours), may result in higher levels than 52 dB for parts of the day. (These higher levels of noise are already experienced by many residents on the western side of the circuit beyond 400m).
- 2.7 If the incident noise is above 55dB, then windows on exposed elevations will need to be kept shut to achieve the required noise reduction within living areas. Protecting gardens from external noise exceeding 50 dB (0700-2300 hrs) would be difficult when dealing with multiple sound sources from sections of motor circuit including elevated angles of incident sound from aviation.
- 2.8 The Noise Assessment does not include information on maximum instantaneous sound levels or noise fluctuations combined with frequency. The character of noise disturbance and annoyance due to motor sports is recognised to be different in character compared to everyday road traffic noise, due to higher fluctuating noise levels not masked out by other ambient noise. However, the Noise Assessment discounts such noise fluctuations by suggesting that the Integrated Noise Model (INM) does not need to account for this and that the typical motor circuit noise experienced at GMC is more like road traffic than proper motor racing.
- 2.9 The averaging effect of expressing noise as sound equivalent levels over time LAeq,T measured from positions within the development site fails to demonstrate the full characteristics of the noise environment. From the lack of descriptive noise data such as LA Max, LA1%, number of events etc, the assessment fails to illustrate the potential disturbance and annoyance of the highly fluctuating noise levels from the various noise sources. Such fluctuating noises are likely to be so intrusive as to seriously compromise the reasonable quiet enjoyment of residential properties. BS 8233:2014 'Guidance on sound insulation and noise reduction for buildings' (paragraph 7.7.1) states that

*“Occupants are usually more tolerant of noise without a specific character...If it contains features such as a distinguishable, discrete and continuous tone, is irregular enough to attract attention, or has strong low-frequency content, in which case lower noise limits might be appropriate.”*

- 2.10 In addition, the Noise Assessment fails to consider the potential disturbance likely to occur due to helicopter overflights. The Civil Aviation Authority (CAA) advice on Noise Considerations at General Aviation Aerodromes states that the public perceive general aircraft noise levels as more disturbing than similar levels around major airports and that helicopter noise is often regarded as more intrusive or more annoying by the general public. The Council is concerned that, whilst most of time air noise levels would be low, there would be periods of increased activity (from helicopters flying directly over rooftops). These may generate disturbance and complaints. Helicopter flyover noise has reached 76-81 dB, so frequent movements on certain days could be very disturbing.
- 2.11 The Noise Assessment disregards noise exposure on Category 1 event days, when significant noise is generated from historic racing, flying displays, and helicopter movements. CJ suggest that because these event days are known about in advance, therefore residents can make alternative arrangements. However, the Council considers that this response would be insufficient, given that Category 1 events are liable to generate the highest number of noise complaints. For example, the Council received 19 additional noise complaints this year following the introduction of the 2-day (Category 1) Private Members meeting in March 2014. These complaints (from residents living around 400m and much further away) described the noise as intolerable, claiming it made their gardens unusable and remained intrusive even behind closed windows. However, the level of noise exposure for the proposed properties closest to the Circuit may be approaching double the loudness compared to residents living between 400 - 800m distant. On this basis, it is likely that new housing close to the Motor Circuit will generate additional noise complaints, which may compromise the staging of future Category 1 events, a situation that the Council would wish to avoid.
- 2.12 Due to the concerns set out above, the Council considers that it is appropriate to adopt a precautionary approach with regard to locating development close to the Motor Circuit/Aerodrome. This view reflects the Council's previous long standing experience of noise complaints received from existing local residents. The Council is concerned that substantial new housing development within the distance on which existing noise controls are based (i.e 400m) would be likely to increase the number of complaints and may affect the future operation of the Motor Circuit/Aerodrome.

2.13 For these precautionary reasons, the Council believes that 400m should continue to be used as a general indicative limit for new housing development. The Local Plan wording in Paragraph 12.48 allows flexibility for limited housing development to occur within 400m of the Circuit, subject to specific criteria being met. Flexibility to build within 400m may be appropriate in the development areas south of Madgwick Lane and west of the River Lavant, where small parts of the land extend within the 400m buffer (although it is likely that most of this land will be required for landscape screening). However, the Council considers that planning new housing where the majority of the development is within 400m of the Motor Circuit/Aerodrome is undesirable, both in terms of the quality of life of the residents and the future operation of the Motor Circuit/Aerodrome.

### **3. Landscape and visual impact**

3.1 The SDL itself is not subject to any landscape designation, but nevertheless covers an area of potentially sensitive landscape between the historic city of Chichester and the South Downs National Park. The NPPF (paragraph 109) states that the planning system should contribute to and enhance the natural and local environment, including by protecting and enhancing valued landscapes.

3.2 The evidence on landscape impacts presented by the site promoters is based on work undertaken by their consultants, Tyler Grange (TG). Appendix 3 of Further Statement Matter 7 (REP-710715-004) includes a statement on landscape and visual impact prepared by TG. This follows their Strategic Landscape Assessment, which formed part of the site promoters' Regulation 20 submission in January 2014. In their statement, TG express the opinion that "delivery of housing on land north of Madgwick Lane can occur without visual harm when properly assessed against the baseline" (paragraph 2.7). They conclude that "The SDL ... has the capacity to accommodate a greater quantum of development than currently proposed, as demonstrated by the masterplan submitted... The benefits of the approach outlined will be to enhance the ecological value of the land on the edge of Chichester, and create accessible open land with a variety of recreational benefits for the existing and new communities, whilst optimising the greenfield release." (paragraph 8.3)

#### Landscape assessment - The Future Growth of Chichester Study

3.3 The Council's assessment of the landscape character of the area is drawn primarily from The Future Growth of Chichester study (FGC) (CD-84a & CD-84b) undertaken by Land Use Consultants (LUC) and published in April 2005. The Study provides an assessment of the landscape and visual constraints to built development around Chichester city. It includes a detailed landscape

character assessment of the area surrounding the city, including identifying 'priority views' to and from the city which should be given special protection. It should be noted that this study was undertaken prior to the designation of the South Downs National Park. This now gives greater weight to the need to avoid harmful impacts on the natural beauty of areas now within the Park, as is discussed in more detail below.

- 3.4 The 'priority views' identified in the FGC study primarily comprise views towards the spire of Chichester cathedral from key points approaching the city. This included the 'View on approaching Chichester along Madgwick Lane from Goodwood' described as "The first view of Chichester for many visitors". Also listed as 'priority views' were 'Panoramic views of Chichester in its landscape setting' including the view from The Trundle.
- 3.5 The FGC study sub-divided the study area into landscape character parcels, which were then assessed in terms of Landscape Character Sensitivity and visual sensitivity (which was considered in terms of Priority Views and Amenity for Local Viewers). The SDL falls within three of the land parcels assessed in the FGC report.
- 3.6 Parcel 17 (Westhampnett west arable farmland) covers the land between Stane Street and Madgwick Lane, which both the Council and promoters consider is suitable for development. The FGC Study classified the area's sensitivity as:
  - Landscape Character Sensitivity: Low-Moderate
  - Sensitivity in relation to Priority Views: Moderate
  - Sensitivity in relation to the Amenity for Local Viewers: Low-Moderate
- 3.7 The area north of Madgwick Lane falls partly within two land parcels defined in the Study.
- 3.8 Parcel 1 (Lavant arable valley floor) covers land from the eastern built edge of Chichester City as far as Old Place Farm. This includes land which Policy 17 proposes for development west of the River Lavant, and also part of the area which the promoters wish to see developed north of Madgwick Lane. The FGC Study classified the area's sensitivity as:
  - Landscape Character Sensitivity: Moderate-High
  - Sensitivity in relation to Priority Views: Moderate-High
  - Sensitivity in relation to the Amenity for Local Viewers: Low-Moderate
- 3.9 Commenting on the area's landscape character sensitivity, the FGC Summary Report (paragraph 5.4) concluded that this is "an area that forms a natural edge to Chichester, an important open setting to the east of Chichester, and a link between the chalk downs and the sea". In relation to priority views, the



Summary Report (paragraph 5.6) stated that “development in this location is likely to be prominent in views from Madgwick Lane and the public footpath on the northern edge of Chichester, and is likely to be visible from the priority viewpoint at The Trundle.”

- 3.10 Parcel 19 (Westhampnett north arable farmland) covers the remaining land between Old Place Farm and the Goodwood Circuit, part of which the promoters consider should be developed. The FGC Study classified the area’s sensitivity as:
- Landscape Character Sensitivity: Low-Moderate
  - Sensitivity in relation to Priority Views: Moderate-High
  - Sensitivity in relation to the Amenity for Local Viewers: Moderate
- 3.11 In relation to priority views, the Summary Report (paragraph 5.6) concluded that “development in this location is likely to be prominent in views from Madgwick Lane and is likely to be visible from the priority viewpoint from The Trundle”.
- 3.12 The Summary Report (paragraph 5.2) states that in the context of the Study, a ‘moderate’ score for certain aspects indicates that that aspect should be taken into consideration in making a decision on the future development potential of the relevant site, whereas a ‘moderate-high’ or ‘high’ score indicates that the aspect in question is likely to be a severe constraint to the location of new build development. It should be noted that the ‘moderate-high’ category represents the highest level of sensitivity identified within the Study area.
- 3.13 From the FGC study conclusions, it is apparent that within the defined boundary of the SDL, the landscape has greater sensitivity to development north of Madgwick Lane, particularly related to views from The Trundle (and the South Downs more generally) and views of Chichester cathedral from Madgwick Lane. In addition, the Lavant valley is seen as forming a natural eastern boundary to the city.
- 3.14 Local Plan Policy 17 and the Council’s Concept Statement for the Westhampnett/ North East Chichester SDL respond to the landscape evidence by directing the majority of the proposed development to the land south of Madgwick Lane, which is less sensitive in terms of landscape character and priority views (particularly with the inclusion of tree planting and buffering on the northern, most prominent part of the land as provided for in the Concept Statement)..
- 3.15 Policy 17 also proposes development on land to the west of the River Lavant, adjacent to the eastern edge of Chichester city. This area falls within Parcel 1 in

the FGC study which is identified as an area of 'moderate-high' sensitivity for both landscape character and priority views. The Council accepts that this area has a relatively higher level of sensitivity, both in terms of landscape and the historic environment, since the land lies adjacent to the Graylingwell Conservation Area which includes the Grade II Registered Historic Park.

- 3.16 However, the Council believes that, if sensitively planned, it is possible to accommodate new development west of the River Lavant, without severely compromising the landscape character of the area. Development would form a limited eastward extension to the existing built area of Chichester city, but would retain the openness of the Lavant valley, which would continue to form the natural boundary of the built area, with open countryside beyond stretching eastwards and northwards towards the National Park. The Council's Concept Statement (paragraph 2.4) sets as development principles in masterplanning that development should "facilitate a transition between the suburban edge of the city and the rural edge defined by the Lavant Valley"; and that "the siting of open space should be used to afford visual links with key features of the surrounding countryside including key views of the downs, and the Graylingwell Hospital tower".
- 3.17 Due to its proximity to the existing built up area, this land also provides opportunities for good connections to existing infrastructure, particularly for cars, pedestrians and cyclists, and good access to facilities and services in the City ensuring that any development would be sustainable.

#### Impact on the South Downs National Park (SDNP)

- 3.18 As noted above, the designation of the SDNP post-dates the publication of the FGC study. The National Parks and Access to the Countryside Act 1949 sets a legal duty for relevant authorities exercising and performing functions in relation to or affecting land, to have regard to the statutory purposes of national parks. The NPPG (ref 8-003-20140306) clarifies that this duty applies to all local planning authorities, not just national park authorities, and that the duty is relevant in considering development proposals that are situated outside National Park or AONB boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas. The Council therefore considers that the potential impact of development on views from and into the National Park and the setting of the Park are important planning considerations, as is reflected in the wording of Local Plan Policy 48.
- 3.19 Although the FGC's assessment of landscape sensitivity already gave strong weight to the potential impact of development on views from key viewpoints on the South Downs such as The Trundle, the legal duty set down in the 1949 Act

now gives greater importance to ensuring that the natural beauty of the Park is not harmed by new development, whether within or outside the Park boundaries.

- 3.20 In section 4.0 of their statement, TG state that the SDNPA has not raised objections to the Westhampnett/North East Chichester SDL at any of the Local Plan consultation stages. Whilst it is true that the SDNPA has not opposed the allocation of the SDL, its comments have consistently emphasised the need for development of site to have regard to the views into and out of the National Park. The Park Authority has also indicated that it would wish to see development confined to southern part of allocated site.
- 3.21 In response to the Local Plan Preferred Approach consultation (May 2013), the SDNPA stated that the “Westhampnett development area would require more scrutiny at masterplanning stage to address potential visibility issues from views within the SDNP” (DLP4023). In its Regulation 20 submission (January 2014), the SDNPA stated that “It is important that the housing and other buildings are confined to the southern part of the identified site. This is likely to be the case as a result of the specific issues described in (Local Plan) paragraph 12.48 (especially the 400m buffer from the Goodwood Airfield and Motor Circuit, the River Lavant floodplain and the green infrastructure strategy) and the site-specific requirements in Policy 17.” (LPPS171)
- 3.22 More recently, SDNPA officers have also indicated that the Park Authority would be concerned if the scale of development at Westhampnett-North East Chichester were to increase above the current proposed level.<sup>5</sup>

#### Landscape implications of the CEG development proposal

- 3.23 In section 6.0 of their statement, TG argue that the development proposed by CEG would realise opportunities and overcome constraints, resulting in:
- i) Enhancement of the green infrastructure network in the area to the east of Chichester.
  - ii) Provision of linear green spaces along the Lavant Valley.
  - iii) Improving access to the SDNP.
  - iv) Improving wildlife corridors.
  - v) Embracing landscape sensitivity of the open character of the site.
  - vi) Encompassing views towards and from the SDNP – including priority views from the Trundle.
  - vii) Enhancing views of Chichester Cathedral – including a priority view.

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<sup>5</sup> Duty to Cooperate Statement (CD-14): Annex 7, Pages 43-44

3.24 Although there is no explicit reference to the Local Plan, the points listed above appear to be an attempt to argue that the proposed CEG development of up to 1,000 homes could meet the specific policy criteria set out in Policy 17.

However, in relation to the supposed benefits listed by TG:

- Points i) to iv) are requirements already sought by the Local Plan as part of a development of 500 dwellings, so cannot be regarded as additional benefits that would be provided by a larger scheme.
- Points v) and vi) are merely assertions, with no explanation of how they would be achieved through the design of any development.
- Point vii) appears to reference the fact that the promoters' illustrative masterplan proposes an area of open space directly north of Madgwick Lane in order to preserve the priority view of Chichester cathedral. Whilst this element of the masterplan would be welcome from a landscape perspective, it would also have the effect of further separating and isolating any development north of Madgwick Lane (this point is addressed in more detail in Section 4 below).
- Overall, points v) to vii) can at best offer limited mitigation that would not compensate for the adverse landscape impacts that would result from developing north of Madgwick Lane.

#### **4. Urban form**

4.1 The third major reason for the Council opposing development on the land north of Madgwick Lane relates to the adverse effect that such development would have in terms of settlement pattern and encroaching 'urbanisation' of the countryside. The arguments here are closely related to the issues of landscape character discussed in detail above, and are also influenced by the impact of the identified noise constraint from the Goodwood Motor Circuit/Aerodrome in restricting the potentially developable area.

4.2 Map 1 shows the Council's assessment of the potential developable area north of Madgwick Lane. Leaving aside the more general assessment of landscape character and sensitivity, Map 1 shows the three clearly definable constraints:

- Land within the River Lavant floodplain falling within flood zones 2 and 3;
- The precautionary 400m buffer which the Council believes would avoid unacceptable noise impacts from the Motor Circuit;
- The open space proposed in the promoters' indicative masterplan to retain the priority view from Madgwick Lane towards Chichester cathedral.

4.3 As shown in Map 1, the remaining area potentially available for development is reduced to a small triangle of land amounting to around 6-7 hectares, physically separate from, and poorly related and connected to, the existing settlements of both Chichester and Westhampnett. This contrasts significantly with the areas

currently proposed for development in Policy 17, where the new development would form well integrated extensions to the existing settlements.

- 4.4 Even if development north of Madgwick Lane were to extend to the whole area identified as developable on the CJ noise constraints plan (potentially up to 20 hectares), the resulting development would, in the Council's view, still relate poorly to the existing settlement pattern of the area. It would result in an isolated pocket of development physically separated from the City by the River Lavant floodplain and from the village of Westhampnett by Madgwick Lane and the proposed area of open space preserving the priority view towards the cathedral.
- 4.5 From viewpoints within the National Park to the north, on the eastern edge of Chichester and other surrounding locations, the development would appear as an encroachment of built development into the rural area. The key landscape characteristics identified in the FGC study – the clearly defined urban edge of the city and the open landscape linking the city with the Downs would be lost. In the Council's view, this presents a fundamental objection to developing in this area, which could not be mitigated through development layout or design.

## **5. Conclusion**

- 5.1 The Council remains opposed in principle to development on the land north of Madgwick Lane and does not accept the site promoters' argument that the Westhampnett/North East Chichester SDL should be allocated for up to 1,000 homes. As has been demonstrated in this appendix, development north of Madgwick Lane would result in significant adverse impacts in terms of noise, landscape and urban form, which cannot be satisfactorily avoided or mitigated.
- 5.2 The Council considers that, due to its location, character and constraints, the land north of Madgwick Lane is fundamentally unsuitable for residential development and that the adverse impacts of development would significantly and demonstrably outweigh the benefits when considered against national planning policy. Therefore, the Council asks the inspector to endorse Policy 17 as submitted and support the allocation of the SDL for 500 homes only.

## Appendix A: Comments on the Noise Assessment prepared by Cole Jarman

Tim Horne, Principal Environmental Health Officer, Chichester District Council

### 1.0 Introduction

- 1.1 The planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution.
- 1.2 The Goodwood Motor Circuit (GMC) and Aerodrome is situated some 180 metres to the north of the proposed development site. As a result noise associated with the permitted activity at the motor circuit and aerodrome will be heard at the proposed development site. The proposed development could therefore be adversely affected by the lawful activities of the motor circuit and aerodrome, which could be a serious source of conflict in the future.
- 1.3 The proposal shows residential development with an approximate 180 m buffer zone against the GMC. Full and proper consideration must therefore be given to the existing activities that take place at both the motor circuit and aerodrome throughout the year as part of the proposal.

### 2.0 Noise Assessment

- 2.1 A full noise assessment has been submitted by Cole Jarman Limited for housing in this strategic development location. The assessment is necessary to demonstrate that the site is suitable for residential development, taking into account noise impacts. The assessment includes an extensive baseline noise survey that evaluates the existing noise environment but without any detailed analysis on the characteristics of the noise, as requested in my email and attachments dated 14 December 2012.
- 2.2 The noise assessment includes long term measurements at 140m and 360m, which demonstrate for most of the time the GMC is operated below a sound level 55 dB  $L_{Aeq,30 mins}$  within the proposed development area. In addition, the Integrated Noise Model used for the Goodwood Aerodrome noise assessment has for the most part demonstrated that typical summer time aggregated aviation activity will not exceed a level of 52 dB  $L_{Aeq,16 hours}$  within the development area.
- 2.3 What is not agreed between the parties is that when you add together the two noise sources then during parts of the day you may experience higher levels than 55 dB  $L_{Aeq,T}$  for significant periods when both activities are intensely participated and that the higher fluctuations in noise from vehicles and aircraft are much more likely to be noticed than a steady “anonymous” noise source. Likewise, if you consider the General Aviation noise level ( $L_{Aeq,16 hour}$ ) on a daily basis other than in an Integrated Noise Model which includes summer time aggregated use for various runways to generate noise level contours, then you will may experience higher levels than 52 dB  $L_{Aeq,T}$  for parts of the day. These higher levels of noise are already experienced by many residents on the western side of the circuit beyond 400m.

So by moving closer to the track and airfield noise you will experience higher levels of noise for parts of the day, particularly when both activities are present.

- 2.4 Given the proximity of the proposed development site to existing noise sources it will prove very difficult to incorporate design features to eliminate noise intrusion within properties without compromising the way residential property is normally used. Residents will want to open windows and enjoy their gardens without constantly being aware of the fluctuating noise from vehicles on the GMC or aircraft landing or taking off nearby. Obviously the further away you are from the noise source then this becomes less significant and more tolerable.
- 2.5 The noise criteria proposed by Cole Jarman have been accepted by Chichester District Council Officers as relevant to any residential scheme, with the caveat that more subjective noise criteria and Category 1 GMC events are seen as relevant to any planning decision.
- 2.6 Occupants of property are usually more tolerant of noise that is anonymous and lacks specific characteristics like tone, intermittency or fluctuations. These are just the type of characteristics that are typified by the motor circuit and aerodrome and which are much more likely to attract attention and complaints. It is noted that the motor circuit is permitted to operate up to five days each calendar year on an unrestricted basis (with no noise limits).
- 2.7 There has been no full disclosure of descriptive acoustics within the noise data that shows indices like maximum instantaneous sound levels  $L_{Amax}$  and  $L_{A1\%}$  during representative periods of operation from the motor circuit and aircraft activities compared to periods of no or reduced activity. This is a disappointing omission within the report. A noise measure based only on energy summation and expressed as the equivalent measure  $L_{Aeq}$ , is not enough to characterize most noise environments. It is equally important to measure the maximum values of noise fluctuations, preferably combined with a measure of the number of noise events. It is accepted that noise from a motor circuit is different to road noise or other more or less continuous noises.
- 2.8 The subjective nature of noise means that there is no simple relationship between noise levels and the impact on those affected. This will depend on how various factors combine in any particular situation. Refer to '**Noise – Planning Practice Guidance**', **Paragraph: 006 Reference ID: 30-006-20140306**
- 2.9 What factors influence whether noise could be a concern?

*These factors include:*

- 2.9.1 *the source and absolute level of the noise together with the time of day it occurs. Some types and level of noise will cause a greater adverse effect at night than if they occurred during the day – this is because people tend to be more sensitive to noise at night as they are trying to sleep. The adverse effect can also be greater simply because there is less background noise at night;*
- 2.9.2 *for non-continuous sources of noise, the number of noise events, and the frequency and pattern of occurrence of the noise;*

2.9.3 *the spectral content of the noise (ie whether or not the noise contains particular high or low frequency content) and the general character of the noise (ie whether or not the noise contains particular tonal characteristics or other particular features). The local topology and topography should also be taken into account along with the existing and, where appropriate, the planned character of the area.*

*More specific factors to consider when relevant:*

2.9.4 *where applicable, the cumulative impacts of more than one source should be taken into account along with the extent to which the source of noise is intermittent and of limited duration;*

2.9.5 *consideration should also be given to whether adverse internal effects can be completely removed by closing windows and, in the case of new residential development, if the proposed mitigation relies on windows being kept closed most of the time. In both cases a suitable alternative means of ventilation is likely to be necessary. Further information on ventilation can be found in the Building Regulations.*

2.9.6 *In cases where existing noise sensitive locations already experience high noise levels, a development that is expected to cause even a small increase in the overall noise level may result in a significant adverse effect occurring even though little to no change in behaviour would be likely to occur.*

2.10 World Health Organisation Guidelines for Community Noise (WHO 1999), concluded that a noise level of 50 - 55 dB  $L_{Aeq,T}$  over the day, on a regular basis, represents a threshold for the onset of community annoyance from general transportation and industrial noise. Daytime noise levels of 63 – 72 dB  $L_{Aeq,T}$  are liable to cause significant interference with domestic activities, such that (for example) planning consent should normally be refused for new residential developments.

2.11 The predicted noise level at the measurement positions CJ1 and CJ2 demonstrate that the noise level of 50 to 55 dB  $L_{Aeq,30mins}$  is likely to be experienced within the development area when GMC trackside noise measurements exceed 75 dB  $L_{Aeq,30mins}$  during parts of the day when GMC has Categories 2 and 3 type uses. A noise level of 70 - 75dB  $L_{Aeq,30mins}$  is likely to be experienced when GMC trackside noise measurements exceed 95 dB  $L_{Aeq,30mins}$  from any Historic Racing events (Category 1 - maximum 5 days) at GMC.

2.12 Noise from vehicles on the closest parts of the GMC during days when trackside noise measurements regularly exceed 75 dB  $L_{Aeq,30mins}$  will be clearly noticeable in the proposed development areas and will cause small changes in behaviour and a degree of annoyance to some residents. On up to five days per year, the noise levels will be so noticeable that material changes in behaviour like staying indoors and keeping windows closed most of the time to avoid excess noise.

2.13 The type of disturbance and annoyance due to motor sports vehicles is different in character and cannot be compared to every day road transport noise sources. It is the higher fluctuating noise level that draws most attention, which at close proximity is unlikely to be masked out by other ambient noise. Daytime noise exposure categories derived for local Road Transport sources will correspond to a more consistent and bland noise resulting from



the flow of traffic, from near and far, between 0700 to 2300 hours that does not take into account subjective assessment of the noise.

- 2.14 In the absence of any other local noise source you could listen to passing traffic and perhaps point out an occasional noisier vehicle like a motorbike, especially during peaks of acceleration. If a high performance sports car or motorbike passed by at high speed (as experienced on the GMC) you would notice it as a much noisier event, which if permitted on a regular basis would be perceived as a more intrusive sound that adversely affects the amenity value of the surrounding land.
- 2.15 The Cole Jarman noise assessment uses an integrated noise model to calculate the noise impact of aircraft movements on each runway (06 & 24 and runways 14 & 32) and helicopter circuits. From this computed information noise contours have been derived. It is accepted that the development land is not directly overflown from any runway although the helicopter routing from the southern side does bisect part the land between Madgwick Lane and the aerodrome close to Old Place Farm.
- 2.16 NOISE CONSIDERATIONS AT GENERAL AVIATION AERODROMES – Civil Aviation Authority, November 2012
- 2.16.1 *“Local planning authorities should also be aware that in some circumstances the public perceive general aircraft noise levels as more disturbing than similar levels around major airports.”*
- 2.16.2 *“Helicopter noise has different characteristics from that from fixed wing aircraft, and is often regarded as more intrusive or more annoying by the general public.”*
- 2.17 This reaction is based largely on the tonal characteristics of light aircraft (engines and propellers) and the dynamics of helicopter rotor blades and also the type of activity including repetitive circuit flying and aerobatics.
- 2.18 Whilst it is accepted that any residential development here may be exposed to lower levels of aircraft noise in terms of individual events and INM predicted noise levels than existing residential areas to the west, this does not excuse subjecting new residents to aerodrome noise by building ever closer. It is not clear whether the Cole Jarman assessment considers worst case noise levels using a substantial increase in helicopter movements although their noise model does allow for increases in air movements up to the maximum permitted levels.
- 2.19 While it is suggested that most of the time the proposed residential areas would experience air noise below 52dB  $L_{Aeq,16hours}$  and the likely reported disturbance would be low, it is difficult to follow this line of reasoning for periods of increased activity when there may be more helicopters flying directly over the roof tops.
- 2.20 The unique characteristics of a helicopter in terms of its manoeuvrability and noise signature require special consideration especially since the published southern NAPs route would overfly the part of the residential development area.

- 2.21 Their report goes into the types of helicopter activities in more detail and then aggregates over a typical year the number of helicopter movements which may follow circuits for training purposes. It is projected that those that overfly the site would be up to 7 movements per day. In relation to fixed wing movements these numbers are relatively low.
- 2.22 The current number of helicopter movements across the site is low when aggregated across the annual period, however, the magnitude of the noise events needs understanding to establish whether the level of noise would be sufficient to cause disturbance. Helicopters witnessed during attended monitoring had  $L_{Amax}$  of 76-81dB(A). If the frequency of movements increases on certain days then this could be very disturbing.
- 2.23 What the report does not appear to consider is whether the number of helicopter flights may be concentrated on certain days of the year. It is a significant concern that air movements are based only on aggregated numbers when in reality there is nothing to prevent more intense patterns of training involving more air movements on any given day. It would take approximately 20 movements of the Bell 206 helicopters (used for training) to exceed the 52 dB  $L_{Aeq,16hours}$  General Aviation threshold considered acceptable. The high sound level generated by helicopters is likely to significantly outweigh the contribution from all other GA noise sources, albeit that exposure is relatively brief. The highly characteristic noise from helicopter over flights will be clearly perceptible both inside and outdoors. Even with a good standard of sound insulation applied to dwellings it may prove difficult to mitigate against noise intrusion from this source.
- 2.24 If the helicopter training is an important part of aerodrome business and there is plenty of growth potential. I am concerned that any increase in this activity will become a significant source of noise complaint.
- 2.25 Almost all existing residential development in the surrounding communities is at least 400m away from the GMC. Measurements have shown that noise from GMC use still affects residents at this range and is still discernible within property although most impact relates to outdoors amenity, it does still attract noise complaints to the Council on occasions. Noise controls at the GMC have been adopted under planning have been tailored to adequately protect residents living around 400m from the GMC and judging by the reduction in noise complaints over the years, noise management has effectively controlled noise to an acceptable level within the existing local community. While the noise is still noticeable on occasions, when downwind and against low background noise, we are satisfied that it does not amount to an intrusive noise that would have any significant impact on a person's behaviour. On this basis we adopt the precautionary approach that a 400m buffer is the approximate separation distance necessary to minimise the worst noise impacts. It is accepted that in some circumstances the 400m becomes more flexible especially where proximity to a busy road may mask the more distant source, reducing the impact of any intrusive character it conveys. It is recognised by Cole Jarman that on Category 1 days the noise will be significant. Residents around 400m will be adversely affected on the exposed facades and appropriate consideration must be made to the design features and protection of outdoor spaces to ameliorate the noise impacts on such days. In light of the above comments we would advocate a precautionary approach by maintaining an approximate

400m buffer around the motor circuit to allow for higher fluctuations in noise and the noisiest events. We are very concerned that by allowing residential development much closer occupants will start complaining about noise, as our experience informs, and demand that actions be taken against existing use of the GMC to reduce noise impacts.

2.26 The design specification for buildings can produce a high standard of sound insulation and result in a good design standard for indoor ambient noise levels in accordance with BS 8233:2014. However, if the incident noise is above 55 dB  $L_{Aeq,T}$  then windows on exposed elevations will need to be kept shut to achieve the required noise reduction within living areas. So whilst the free-field noise level is unlikely to exceed a level of 55 dB  $L_{Aeq,16\text{ hours}}$  within the development area for most days in the year, there will be times when Category 1 GMC events, airfield days including noisier elements (flying displays at lower altitudes across the airfield, pleasure flights in helicopters, aerobatics and vintage fighter planes), and possibly firework displays associated with events and celebrations, when the overall daily noise dose will be exceeded. It is these types of higher noise activities, possibly not captured by noise monitoring to date or not fully depicted by use of an Integrated Noise Model, which will cause most impact to those closest to the airfield and motor circuit. A free-field noise above 55 dB  $L_{Aeq,T}$  will become an incident noise above 58 dB  $L_{Aeq,T}$  in front of a window due to façade effects. The internal noise may be higher than 48dB  $L_{Aeq,T}$  from a fully open window. This is well above the desirable day time resting comfort level of **35 dB  $L_{Aeq,16hr}$**  and the room would require alternative means of ventilation if windows needed to be kept shut.

2.27 **‘BS 8233:2014 Guidance on sound insulation and noise reduction for buildings’** gives the following guidance on maximum internal noise levels at

#### **7.7.1 Dwelling houses, flats and rooms in residential use (when unoccupied)**

This sub-clause applies to external noise as it affects the internal acoustic environment from sources without a specific character, previously termed “anonymous noise”. Occupants are usually more tolerant of noise without a specific character than, for example, that from neighbours which can trigger complex emotional reactions. For simplicity, only noise without character is considered in Table 4. For dwellings, the main considerations are:

- a) for bedrooms, the acoustic effect on sleep; and
- b) for other rooms, the acoustic effect on resting, listening and communicating.

***NOTE Noise has a specific character if it contains features such as a distinguishable, discrete and continuous tone, is irregular enough to attract attention, or has strong low-frequency content, in which case lower noise limits might be appropriate.***

#### **7.7.2 Internal ambient noise levels for dwellings**

In general, for steady external noise sources, it is desirable that the internal ambient noise level does not exceed the guideline values in Table 4.

**Table 4. Indoor ambient noise levels for dwellings**

Activity	Location	07:00 to 23:00	23:00 to 07:00
Resting	Living room	35 dB $L_{Aeq,16hr}$	-
Dining	Dining room/area	40 dB $L_{Aeq,16hr}$	-
Sleeping (daytime resting)	Bedroom	35 dB $L_{Aeq,16hr}$	30 dB $L_{Aeq,8hr}$

The above design standards applied to the time period appropriate for the activity involved. The document on which the standards are based is *The Guidelines for Community Noise (World Health Organisation, 1999)*. The document sets out guideline values for suitable noise levels in communities and identifies that the daytime noise standard applies to a normal 16-hour day between 07.00 and 23.00 that corresponds to internal living rooms, while the night time standard applies to an 8-hour night between 23.00 and 07.00, the next day, corresponds to bedrooms.

- 2.28 External areas cannot, by definition, be controlled or benefit from the levels of noise mitigation that are available to internal spaces within buildings. As a consequence, decibel standards for external noise cannot be considered as thresholds that determine whether a high quality design has been implemented and a good level of amenity achieved. Rather, the external noise standards should be used to establish whether mitigation is appropriate as a means of minimising the adverse impacts of environmental noise.

#### 7.7.3.2 Design criteria for external noise

For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB  $LA_{eq,T}$ , with an upper guideline value of 55 dB  $LA_{eq,T}$  which would be acceptable in noisier environments.

Therefore, when designing a dwelling or other noise sensitive developments that incorporate gardens or other external amenity areas, the intent should be to provide an area (or some areas) in which the noise levels are consistent with the standards. Where the standards cannot be achieved, then reasonable measures should be employed to provide screening or other forms of mitigation so as to minimize the noise levels in the external amenity areas.

- 2.29 The intention is to provide protection of gardens from external noise so that the noise level does not exceed 50 dB  $L_{Aeq,16\text{ hours}}$  (0700 – 2300 hours) so that occupants can enjoy a good outdoor amenity. The character in the noise is just as relevant when considering the tolerance of persons exposed to highly fluctuating noise sources outdoors. The practicality of achieving this standard of amenity is going to be difficult when you are dealing with multiple sound sources from sections of the motor circuit including elevated angles of incident sound from aviation. It is expected that some dilution of this standard will be sought during final detailed planning submissions.

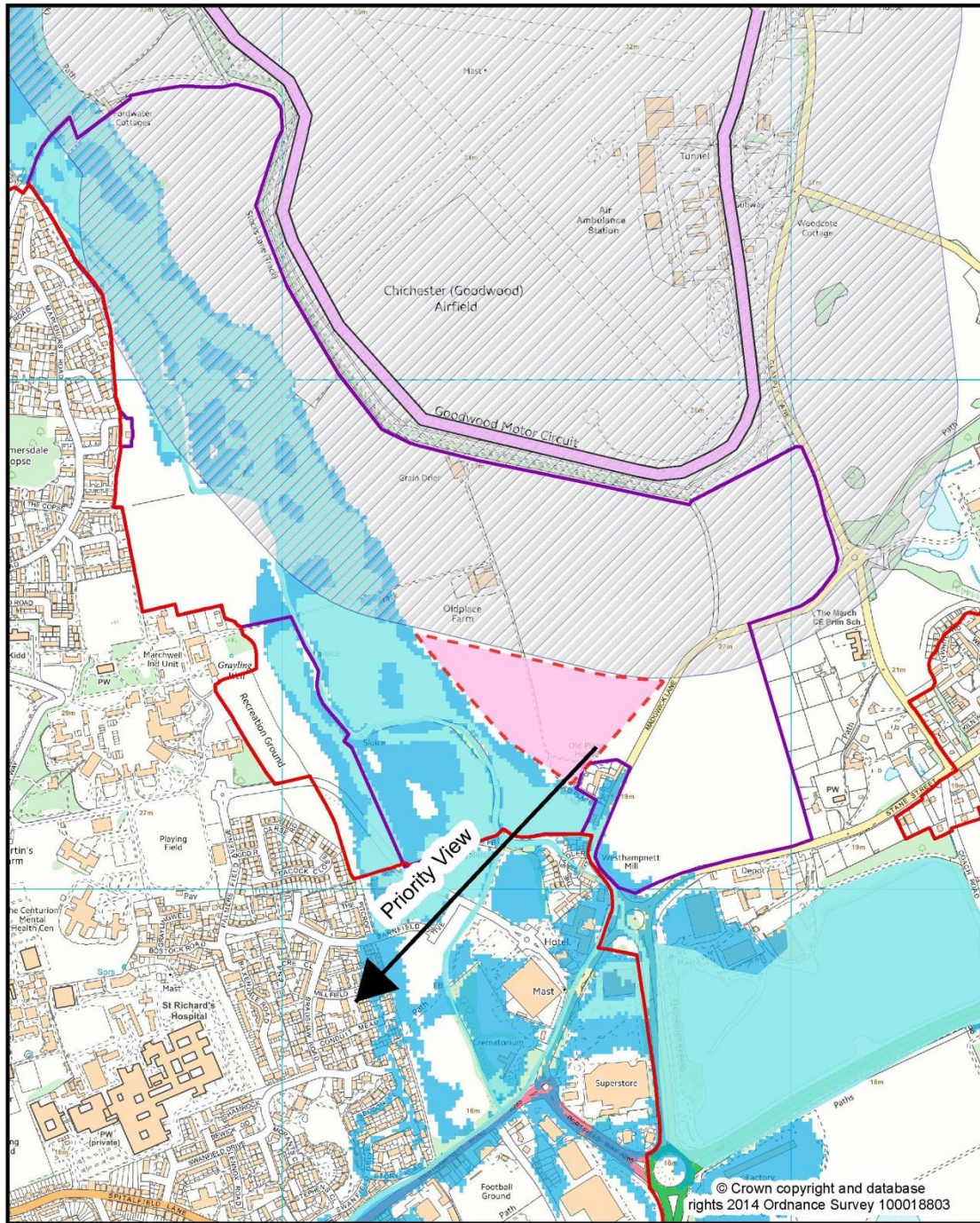
### 3.0 Conclusions

- 3.1 The averaging effect of expressing noise as sound equivalent levels over time  $L_{Aeq,T}$  measured from positions within the development site fails to demonstrate the full characteristics of the noise environment. From the lack of descriptive noise data such as  $L_{Amax}$ ,  $L_{A1\%}$ , number of events etc, the assessment fails to illustrate the potential disturbance and annoyance potential of the highly fluctuating noise levels from the various noise sources. Such fluctuating noises can be much more intrusive than a steady noise of the same sound equivalent level and compromise the quiet enjoyment of residential properties.
- 3.2 The proposals to establish residential development as close as 180 metres from the south side of GMC is very close to vehicles emitting high maximum noise levels ( $L_{Amax}$ ) 96 – 101dBA at 10m from trackside. Any residents in this locality will be exposed to higher fluctuating noise levels from passing vehicles usually 10 – 20 seconds gaps, with  $L_{Amax}$  above 65dBA in the gardens and impacting on buildings around the site.
- 3.3 Measurements show that levels in excess of 50dB  $L_{Aeq,30mins}$  may result from the GMC although it is accepted that over a 16-hour period then other road traffic noise from near and far may be a more consistent source of noise over parts of the site, depending on the distance from the nearest road.
- 3.4 Unfortunately there is no accepted method of relating community response to noise from motor sports with measured or predicted noise levels. While a broad view of the significance of the predicted noise levels can be gained from consideration of guidelines relating to the general acceptability of noise from other commonplace sources, particularly industrial and transportation sources, this assessment fails to subjectively identify and highlight the most significant noise impacts resulting from the current uses.
- 3.5 The GMC is currently operating well under their maximum permitted levels in terms of noise outputs. The noise assessment does allow for additional exposure that may result if noise levels intensify within their legal entitlement. However, in the absence of other ambient noise the imposition of levels much in excess of 50dB  $L_{Aeq,30mins}$  due to GMC is a step change to be avoided. The imposition of levels in excess of 70dB  $L_{Aeq,30mins}$  on historic racing days (Category 1) is unacceptable as it will most probably result in many new complaints and investigation for statutory noise nuisance under the Environmental Protection Act 1990.
- 3.6 Studies show that General Aviation (GA) aircraft noise is considered to be more disturbing than aircraft using large commercial airports and a level of 52dB  $L_{Aeq,16hours}$  for GA is taken to be the trigger for the onset of significant community annoyance.
- 3.7 While it is suggested that most of the proposed residential areas would experience noise below 50dB  $L_{Aeq,16hours}$  and hence the likely reported disturbance would be low. The report does not explain why on some occasions during more intensive use the daily noise levels experienced from GA activities may be much higher than the noise contours indicate. Neither does the aggregation method fully account for days when helicopter flights over the development may be higher than average.
- 3.8 The majority of aircraft using the airfield will not travel very far and many will simply practice flying circuits relevant to runways used on any day. This means that areas close to the ends

of the runway will sometimes be exposed to light aircraft arriving and departing on a frequent basis. On a busy day this may mean in excess of 100 air traffic movements (ATMs) taking place within a 5 to 6 hour period. Taking noise exposure over a 16 hour day does not necessarily reflect the annoyance and disturbance caused on occasions where there is intense use, in particular those involving landing and taking off from runway (R32/14).







- 3.9 Helicopter noise will be apparent within the development site, the frequency of movements is something that is a serious consideration in terms of disturbance both outdoors and inside property. Any increases in the daily number of helicopter movements using the southern circuit across this development site will contribute significantly to the noise exposure for residents. Whilst a daily average of less than 7 movements is acceptable, movements exceeding 20 in number may start to cause community annoyance.
- 3.10 The proposed development of the site may conflict with the future operation of the airfield, especially the routing of helicopters, which the Goodwood Estate would probably wish to avoid. For reasons of noise and safety it is undesirable for helicopters to approach the airfield low over the gardens and roof tops of residential development in parts of the proposed development area. In terms of aircraft safeguarding then the Goodwood Aerodrome's southern routing for helicopters will need to be altered to avoid any emergency landings in the proposed development area.
- 3.11 The impact of both GMC and Aircraft noise sources needs to be considered as an 'in-combination effect'. The reports focus on noise exposure at the development site from both GMC and Aircraft activity mainly on the basis of long term exposure  $L_{Aeq,16hours}$ . There should be some commentary on what short term noise levels are likely to be experienced and what impacts these may have on any residents. There is concern that higher noise levels resulting from the GMC and aircraft, including helicopters, will cause noticeable fluctuating noise levels both outdoors and inside property. Occupiers of properties closest to the circuit and flying activity will at times be exposed to relatively high levels of combined noise when compared to properties much further away. The character of the noise is more likely to cause noise complaint.





**Map 1: Westhampnett-North East Chichester Strategic Development Location**  
 Land north of Madgwick Lane not subject to constraints due to noise, flood risk or priority views.

**Legend**

- |   |  |   |                              |
|---|--|---|------------------------------|
|  | Land north of Madgwick Lane not subject to noise, flood risk or priority view. |  | Goodwood noise buffer (400m) |
|  | Settlement Boundary  |  | Flood Zone 2                 |
|  | Policy 17 Westhampnett/North East Chichester Strategic Development Location    |  | Flood Zone 3                 |
- 1:10,000  
Date Saved: 28/10/2014