

Chichester Local Plan Review

Addendum to Habitats Regulations Assessment
Pre-Submission Modifications

Chichester District Council

Project number: 60549754

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Quality information

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1. Introduction

- 1.1 AECOM was appointed by Chichester District Council to assist the Council in undertaking a Habitats Regulations Assessment of the Chichester Local Plan 2021-2039 . The HRA was consulted upon in early 2023 and included an appropriate assessment that concluded no adverse effect on the integrity of any European sites, and that the Local Plan had a suitable framework in place that development delivered would not affect the integrity of any European site either alone or 'in-combination' with other plans and projects.
- 1.2 Following the consultation on the Local Plan the Council has proposed a series of suggested modifications to the Local Plan prior to submission of the Local Plan. It is therefore necessary for those modifications to be analysed in order to confirm that they will not themselves introduce new likely significant effects that were not thoroughly investigated for the HRA of the Local Plan. That is the purpose of this report.
- 1.3 Note therefore that this report should be considered an Addendum to the HRA of the Local Plan. As such, it does not recap the methodology of the HRA or the results of either the likely significant effects test or the appropriate assessment of the Local Plan, including the 'in-combination' assessment. Instead, it focuses specifically on whether the proposed modifications will result in likely significant effects on any European sites.

2. Likely Significant Effects of the Proposed Modifications

Modifications to Policies and Supporting Evidence within the Local Plan

- 2.1 The table overleaf sets out the assessment of each of the proposed modifications.

Table 1. Test of Likely Significant Effects for the proposed modifications to the Chichester Local Plan.

Page Number	Policy/Para/Map Reference	Suggested change Modified text (deleted text shown as struck-through and additional text in Bold)	Reason for Change	Test of Likely Significant Effects
Contents				
P8	Policy A15 Loxwood	Insert line above Policy A15 and insert text "Loxwood" and page no.	It comes under Land West of Tangmere as it is	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P17	New paragraph between 1.37 and 1.38	Insert paragraph explaining the Regulation 19 consultation: "The Publication (Regulation 19) version of the Local Plan was published on the 3 February 2023 and provided the final, formal opportunity for the local community and stakeholders to give their views on its content in terms of soundness and legal compliance. Approximately 2,400 individual responses were received from 319 consultees. Representations that were made at this stage formed the basis for the public examination and were submitted to the Inspector for consideration".	Factual update	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Chapter 1 Introduction				
P11	Paragraph 1.11	Add date for Local Strategic Statement: "identified in the Coastal West Sussex and Greater Brighton Local Strategic Statement as updated in January 2016 (known as LSS2) "	Clarification	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P13	Paragraph 1.14	Remove date after reference to National Planning Policy Framework: "The National Planning Policy Framework (NPPF) (2021)..."	Update	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Chapter 2: Vision and Strategic Objectives				
P19	Paragraph 2.3	Change the population figure for Chichester to read: '... of around 33,703 29,193⁽⁴⁾ and ...' and amend accompanying footnote to read: 'ONS Mid-Year Parish Population Estimates 2020 ONS 2021 Census. Unless otherwise stated information in this section is taken from the 2021 Census. '	Factual update to reflect 2021 Census	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

P19/P20	Paragraph 2.4	In first bullet point change the population figure for East Wittering and Bracklesham and delete footnote reference to read: 7,4824,899⁽⁴⁾ In second bullet point change the population figure for Selsey and delete footnote reference to read: 10,92610,668⁽⁴⁾ In third bullet point change the population figure for Southbourne and delete footnote reference to read: 4,9676,820⁽⁴⁾ In fourth bullet point change the population figure for Tangmere and delete footnote reference to read: 4,0003,158⁽⁴⁾	Factual update to reflect 2021 Census	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P20	Paragraph 2.6	Delete footnote 5	To reflect update to footnote 4	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
P20	Paragraph 2.7	Change percentages to read: '... the national level of 6362.3% at 57.355.8% age of 65 at 27.71% compared to the national level of 18.5%.'	Factual update to reflect 2021 Census	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
P20	Paragraph 2.10	Changes percentages to read: 'Ethnic minorities make up 57% of the total lower than county (911.1%), regional (13.714.8%) and national (1920.2%) averages.'	Factual update to reflect 2021 Census	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P20	Paragraph 2.11	Change figures to read: '... for males, this is 80.4 years and 84.52 years for females. ...' and amend accompanying footnote to read: '... (published September 2021 January 2024).''	Factual update to reflect 2021 Census	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
P21	Paragraph 2.12	Change percentage to read: 'The 20 11 Census found that 1415.6% of Chichester'	Factual update to reflect 2021 Census	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P21	Paragraph 2.16	Change paragraph and delete footnote to read: '... district aged over 16 between 16-24 years ... (degree level or above) is 37.245.6% . That is higher that the South East (35.745.1%) and National (33.743.5%) figures ⁽⁴⁾ .'	Factual update to reflect 2021 Census	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..

P22	Paragraph 2.19	Change paragraph and delete footnote to read: '... The employment rate of 16-64 year olds number of people in the district aged over 16 who are economically active is slightly ... of 58.374.8% at 54.274.3% , however ...' ⁽⁴²⁾	Factual update to reflect 2021 Census	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P22	Paragraph 2.21	At end of paragraph 2.21 add new sentence to read: The rich and diverse coastline of Chichester Harbour supports both tourist activity and provides an ideal location for businesses linked to the marine sector.	To highlight the importance of the coastal economy.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P24	Para 2.33	Amend first part of para: Targets for Minimum energy performance requirements, maximum CO2 emissions, fabric energy efficiency and primary energy rates and building emissions rates for new and existing buildings are set through Building Regulations which requires (Reg 25B) that all new buildings are "nearly zero energy". The 2022 2021 updates to Approved Document Part L, incorporating 2023 amendments , which provides...	To add clarification, and to remove reference to specific Reg numbers as these may change depending on the outcome of the Future Homes and Buildings Standards consultation which began in Dec 2023.	No likely No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
P24	Para 2.33	Amend final sentence of para: This is an interim step prior to the full Future Homes and Buildings Standards which are due to be implemented in 2025 – with consultation during on the changes proposed began in December 2023.	Update to reflect consultation start.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P26	Vision	In first bullet, after "high summer temperatures" insert " water scarcity "	Request from Natural England	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P28	Para 2.47	After Medmerry Compensatory Habitat add " and other constraints "	To clarify that the designations mentioned aren't the only reasons for less development on the Manhood (more detail is at 3.20)	No likely No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P28	Para 2.48	Insert " including marine related leisure " after "tourism"	Clarification	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P29	Para 2.52	Insert " Economic " after "Sustainable" in Strategic Objective 1.	Correction	No likely significant effect.

				The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P29	Paragraph 5.53	Amend dates in relation to Local Strategic Statement: "for the period to 2015 – 2025"	Clarification	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P30	Objective 1	Amend first part of the explanatory text: New development will be in accessible locations with local access at the core of the design, linked by high quality active travel, walking and cycle routes that also link to bus stops and, where available, rail stations where access is required to facilities that cannot be provided locally. designed to reduce reliance on the private car with convenient walking and cycling routes and public transport o access facilities and open spaces.		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
P30	Objective 2	Add additional text at end of the text in bold: -,and conserving and enhancing the Chichester Harbour Area of Outstanding Natural Beauty and South Downs National Park and their setting.		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
P30	Objective 2	Amend final sentence of the explanatory text: Where All relevant, developments will also be nutrient neutral and/or water neutral to protect water quality.		No likely No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
P30	Objective 3	Delete final sentence: Good design will consider climate change, help to reduce crime and the fear of crime, create beautiful places accessible to all, build communities, and be well integrated with existing communities and facilities.	To avoid duplication with Objective 6 which covers design.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P31	Objective 4	Insert after "tourism" in 1 st sentence of the explanatory text: (including marine related leisure), hospitality, bespoke vehicle manufacturing	To clarify that marine leisure is included on "tourism" and to add reference to other locally important sectors	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P31	Objective 5	Replace "opportunities for active travel" with "with active travel designed into communities" .		No likely No No likely significant effect. The changes made in this modification do not

P31	Objective 6	... blue infrastructure., incorporating the special qualities of designated landscapes where required.		change the conclusions of original HRA and therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P32	Objective 7	In the first para of explanatory text: improvements to transport active travel infrastructure, public transport, And in the second para: improvements will be designed in line with the hierarchy for road user with priority for people walking, cycling, public transport so that people choose active travel or active travel combined with public transport as the obvious way to access what they need. These measures will delivered to mitigate congestion, including measures to mitigate ion of potential impacts on the A27 through a monitor and manage process.	To clarify preference for active travel	No likely No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P32	Objective 7	Add to the end of the third paragraph of explanatory text: Nature based solutions will be used where these are appropriate.		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Chapter 3: Spatial Strategy				
P36	Paragraph 3.19	Amend second sentence to read: 'Opportunities for development in this area appear to be limited due to land availability, landscape considerations, including the setting of the National Park, settlement patterns and available infrastructure.'	To acknowledge that the setting of the National Park is a consideration in this area.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p36	Paragraph 3.21	Amend first sentence to read: 'The north of the plan area covers those parts of Chichester District which lie north of the South Downs National Park boundary and includes its setting.	To acknowledge that the setting of the National Park is a consideration in this area.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p36	Paragraph 3.21	Amend first sentence of paragraph 3.21 to read: '... which lie north and east of the South Downs National Park boundary.'	Factual accuracy	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p39	Policy S1 Spatial Development Strategy	Remove number from Point 7 and re-align to left margin.	To clarify that sentence applies to the whole policy	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

p.40	Map 3.1 Key diagram	Remove strategic employment site icon for SW Chichester	Left on map in error	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.40	Map 3.1 Key diagram	Chichester Harbour AONB boundary not clear where it is overlaid with roads – make boundary clearer	To make it clearer	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P40	Map 3.1 Key diagram	Change the name of the map box titled 'North of the Plan Area' to 'Hammer/Camelsdale'	For consistency with the wording of paragraph 1.9	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
P40	Map 3.1 Key diagram	In the legend write the acronyms HDA, BLD, SWC and SAC in full	Clarification	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
P40	Map 3.1 Key diagram	Delete one of the Fishbourne labels	Typo	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P42	Policy S2 Settlement Hierarchy	Last sentence – repetition of word 'local'. Amend to 'or meets an essential local rural-local need...'	Clarification	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P42	Policy S2 Settlement Hierarchy	In first line of final paragraph remove capitalisation of 'rest'.	Typo	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

Chapter 4: Climate Change and Natural Environment

P43	Paragraph 4.1	Paragraph changed to read as follows: "National policy promotes increasing energy efficiency, the minimisation of energy consumption and the development of renewable energy sources. This Plan is supportive of large renewable energy schemes provided these can be delivered with any significant adverse impacts appropriately mitigated. The council acknowledges that there may be instances where the benefits of a scheme outweigh the adverse impact. The council also recognises that in many cases, the development site can be returned to its original use if changes in renewable technology mean that the scheme is no longer required. development that promotes these objectives. An important element in this is to ensure that the council embraces effective energy efficiency and the use of off-site renewable energy in all new development, helping to reduce the emission of greenhouse gases and therefore climate change. The council's Climate Emergency Detailed Action Plan and its Annual Progress Report provide details of the council's plans in relation to renewable energy generation within the district including annual progress made in relation to planned actions. The council continues to work collaboratively with other district councils and West Sussex County Council in relation to climate action."	To provide further clarity, in particular, acknowledge the site can be returned to its former use; acknowledge that the benefits of a scheme may outweigh adverse impact; and provide details of the Council's progress in relation to renewable energy generation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.44	NE1	Insert at criterion 1: "views into and from the South Downs National Park and Chichester Harbour AONB".	Consistency with other policy criteria	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.44	NE1	At third paragraph, Insert "to meet Biodiversity Net Gain requirements" at end of sentence and delete "within the site of the proposed development" and at final paragraph, change to read "The social, and economic and environmental benefits...."	To highlight the importance of the environment/biodiversity	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.45	Para 4.7	Change as follows: "...guidelines relating to development. Chichester Harbour Conservancy's The Chichester Harbour AONB Management Plan (the Management Plan) prepared by Chichester Harbour Conservancy on behalf of Local Authorities; Chichester Harbour AONB Landscape Character Assessment;.."	CHC request to correct error	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.45	Paragraph 4.7	Addition of "Chichester Harbour" in front of AONB in second and third sentence.	Provides clarity	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.46	Para 4.8	Add to paragraph 4.8: "...For proposals not in accordance with the Development Plan, that will result in the loss or likely cumulative loss of 20 hectares or more of best and most versatile agricultural land, the council will, in accordance with Section 18 and Schedule 4(y) of the Town and Country Planning (Development Management Procedure) (England) Order 2015, consult with Natural England and have regard to "Natural England's Guide to assessing development proposals on agricultural land (2021)" and any subsequent guidance."	To provide clarity in relation to legislative basis for consultation requirement for losses of BMV land.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.46	Para 4.9	Change to read "local character and setting of the protected landscape...."	Provides clarity	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.47	NE2	Criterion 4: Delete word "significant".	To reflect NPPF paragraph 174b and paragraph 001 of Natural Environment Planning Practice Guidance.	No likely significant effect. The changes made in this modification do not

p.47	NE2	Delete criterion 5.	To avoid duplication with Policy NE13.	change the conclusions of original HRA and therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.47	NE2	Change penultimate paragraph to read: “For large-scale proposals larger schemes in identified character areas, Landscape and Visual Impact Assessments (LVIAs) may be required. The LVIA should be used to identify, describe and assess the likely significance of the effects of change resulting from the development a project on both the landscape (including the direct and indirect change to the landscape’s sensitivity, character and condition) as well as the as an environmental resource and on the views and visual amenity and visual receptors. LVIAs may also be required for small-scale development proposed within the setting of the Chichester Harbour AONB or South Downs National Park. Further guidance should be sought from the relevant Strategy, Management Plan or SPD and/or general national guidance.”	To provide clarity regarding LVIAs.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.47	NE2	In final paragraph: “... Landscape Gaps, Strategic Wildlife Corridors , Chichester Harbour AONB,	Reference to Strategic Wildlife Corridor added for consistency.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.48	NE3	Amend second sentence of Policy NE3 to read: “ Including by taking account of the landscape character , the precise boundaries of gaps will be defined in either a Site Allocations DPD or through neighbourhood plans.”	Policy would benefit from the addition of the reference.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P.49	Para 4.17	Include following sentence at end of paragraph: “Regard should also be had to the Draft Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol (2018) or any subsequent updated guidance.”	To address representation from NE	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P.49	Para 4.18	Amend paragraph to read: “The council will apply an additional layer of planning restraint to the countryside protection policies within these strategic wildlife corridors to ensure that connectivity between the South Downs National Park and the Chichester Harbour AONB and Pagham Harbour is maintained in the long term. Within the corridors will be necessary to demonstrate that no land outside the corridor is available for development and the development will not have an adverse impact on the integrity of the corridor.”	To address representations	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P.49	After current paragraph 4.18	Insert new paragraph: “An assessment of the impact of development will be undertaken on a case-by-case basis, as the quantity and quality of habitat present will differ across sites and the impact will be different according to the type and scale of development proposed.”	To provide clarity	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

P.49	After current paragraph 4.18	Insert new paragraph: "For applicants, this will mean that an assessment of habitat features within the site will need to be undertaken, to establish what features are present (for example, treelines, hedgerows, ditches, watercourses), how features can be retained, protected and enhanced to ensure that connectivity for wildlife can be facilitated across the site. Applicants will need to have regard to the connectivity of the corridor as a whole; whilst it is not within the ability of an applicant to enhance features on land not within their ownership, the wider connectivity and integrity of a corridor is essential to its functionality."	To provide clarity.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
P.50	NE4	Amend policy wording: Development proposals within, or in close proximity to, strategic wildlife corridors, as shown on the Policies Map , will only be permitted where they can demonstrate they it would not lead to an adverse effect impact upon the ecological value, function, integrity and connectivity of the strategic wildlife corridors, and protects and enhances its features and habitats. Development proposals within strategic wildlife corridors will only be granted where it can be demonstrated that: 1. There are no sequentially preferable sites available outside the wildlife corridor; and 2. The development will not have an adverse impact on the integrity and function of the wildlife corridor and protects and enhances its features and habitats. Development proposals outside, but in close proximity to the strategic wildlife corridor will be acceptable where it can be demonstrated that: a) The development will not have an adverse impact on the integrity and function of the wildlife corridor; and b) The proposal will not undermine the connectivity and ecological value of the corridor. All proposals for new development (with the exception of householder applications) within or in close proximity to wildlife corridors should take opportunities available in order to extend and enhance those corridors.	To address representations	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
p.51	Para 4.22	Addition of text to the end of paragraph as follows: <u>"Guidance for developers is provided (and will be updated as necessary) to inform development proposals and biodiversity plans."</u>	To provide reference to forthcoming biodiversity guidance to inform developers.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.52	Para 4.24	Remove the reference to Nature Conservation Strategy at the end of the paragraph.	Cannot find any evidence of this document, so presumably it is no longer relevant.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.52	NE5	Modification to first paragraph as follows: "avoiding or mitigating any adverse impacts"	To avoid suggestion of an absolute requirement regarding avoidance of impacts that would be overly onerous and inflexible.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.52	NE5	Modification to criterion E. as follows: " Protected and Priority Habitats and Species",	To ensure consistency with NPPF and PPG	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.52	NE5	Insert additional sentence at the end of second paragraph as follows: "...protection and recovery of priority species populations. <u>Regard will be had to the Local Nature Recovery Strategy to inform opportunities for nature recovery.</u> "	To ensure the policy is futureproofed by referring to LNRSS	No likely significant effect.

				The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.52	NE5	Change third paragraph to read: Unless exempt, D development proposals will be permitted where it can be demonstrated that subject to the following criteria have been being met:	To ensure that the applicability of the policy criteria to all development, except that exempt as defined by BNG regulations, is clear, and to recognise the pre-commencement nature of the general BNG condition	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.53	NE5	Modification to criterion 1 b) as follows: "...the Small Sites Metric (or future equivalent) will can be applied;"	Factual amendment to clarify that use of the SSM is a matter of choice, not compulsory.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.53	NE5	Modification to criterion 1 c) as follows: "...elsewhere within the Chichester District Plan Area ..."	To ensure consistency and accuracy.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p53	NE5	Modification to criterion 1 d) and split into two parts as follows: "d) Where agreed appropriate, off-site provision outside but neighbouring the Plan Area may be permitted provided land is deliverable in areas of strategic significance for biodiversity such as those identified within Local Nature Recovery Strategies; New criterion) a As a last resort, and with the agreement of the local planning authority that on or local off-site provision is not possible...."	To ensure the flexibility of the policy by allowing for off-site provision outside of, but neighbouring the Local Plan Area.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.53	NE5	Modification of new criterion 1 f) as follows: Development proposals will provide for the long-term management and maintenance of biodiversity features retained, and enhanced or created within the site or for those features created or enhanced off-site, for a minimum period of 30 years through planning obligations; and	To clarify development management requirements.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P.53	NE5	Modification of new criterion 1 g) as follows: Losses to d Designated sites and irreplaceable habitats are not calculated within excluded from net gain metrics as they are irreplaceable. Proposals which may impact these sites will be required to satisfy the legislative tests as set out in Section 3 below.	To ensure accuracy in relation to consideration of irreplaceable habitats within BNG metric	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
p.53	NE5	Amendment of Point 3 c) "Irreplaceable habitats including ancient woodland (as shown in the policies map) and ancient or veteran trees..." and "...including ancient woodland and ancient or veteran trees..."	To ensure consistent reference is made to ancient and veteran trees.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and

p.53	NE5	Removal of "where possible" from final sentence of Point 3 e)i.	To ensure consistency with NPPF and PPG	therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.55	Para. 4.27	Correct Policy reference NE18 NE19 (nutrient neutrality)	Typo correction	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.55	Para. 4.27	Change to read "...the Arun Valley SAC and SPA, and the Solent Maritime SAC and Solent Coast SPAs.."	To ensure comprehensive description of habitats	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.55	Para. 4.28	Change to read "Evidence demonstrates that there are two-particular pressures on these harbours: nitrate pollution, loss of intertidal habitat due to inappropriate coastal management , and recreational disturbances impacting upon the designated bird populations."	To reflect entirety of pressures on habitats	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.56	Para. 4.31	Change to read "The Arun Valley SPA, SAC and Ramsar site lies within the Sussex North Water Resource Zone which is partly served by supplies from groundwater abstractions near Pulborough..."	To ensure accuracy and consistency with other references to Southern Water's supply in the SNWRZ.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.56	Policy NE6	Amend title of Policy NE6 and section heading to "Chichester's Internationally and European Nationally Designated Habitats" and of introductory sentence "...on internationally and European and nationally important protected habitat sites including."; change criterion a) to read "Water neutrality in the Sussex North Water Resource Zone – Arun Valley SPA, SAC and Ramsar "; change criterion c) to read "...Zones of Influence for Chichester and Langstone Harbour SPA, and Solent..."	To ensure policy focus on international designated sites only, and consistent referencing of habitats	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.56	Policy NE6	<u>Insert new criterion at between b) and c) "Coastal Squeeze in Chichester and Langstone Harbours SPA and Ramsar, Solent Maritime SAC and Pagham Harbour SPA and Ramsar</u> <u>Development proposals on the coast at Chichester and Langstone Harbours and Pagham Harbour, including those relating to the shoreline management of harbour-fronting properties, have the potential to adversely impact the integrity of intertidal habitats as a result of coastal squeeze, and are therefore required to provide appropriate avoidance or mitigation measures in accordance with Policy NE12 (Development around the Coast)"</u>	To reflect the significance of the issue of coastal squeeze.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

p.58	Para. 4.34	Include reference to Natural England Condition Review of Chichester Harbour Site at end of paragraph. (http://publications.naturalengland.org.uk/publication/5535304204419072)	To provide clarity of evidence.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.59	Para. 4.39	Change wording to: For both Chichester and Pagham Harbours some of the bird species for which they are designed designated.. Change wording to " All development (not just residential or tourism related) on or adjacent to these areas can have an impact on could potentially impact the SPAs, separate and in addition to the impact of recreational disturbance"	Correction of typo; to provide clarity	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P59	Paragraph 4.40	Delete NPPF paragraph reference number: Under paragraph 181 of the NPPF	To avoid references to the NPPF becoming out of date.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.60	Policy NE7	Change policy NE7 (Chichester) as follows: "Recreational disturbance It is Natural England's advice that all net increases in residential development, either alone or in-combination with other developments , within the 5.6km zone of influence are likely to have a significant effect on the Chichester and Langstone Harbours SPA by means of recreational disturbance affecting bird species , either alone or in combination with other developments and will need to be subject to the provisions of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended)." And "Loss or degradation of functionally linked habitats The provisions of this policy do not exclude the possibility that any development some residential schemes either within or outside the zone of influence might may require further assessment under the Habitats Regulations. For example, large schemes, schemes proposing bespoke or alternative avoidance/mitigation measures, or schemes that impinge on the supporting habitats identified by the Solent Waders and Brent Goose Strategy. Such schemes will be assessed on their own merits under Regulation 63 (Appropriate Assessment), and, subject to advice from Natural England. Where mitigation for any impact upon supporting functionally linked habitats is required this should follow the guidance given in the Solent Waders and Brent Goose Strategy." Change Policy NE7 (Pagham) as follows: "Recreational Disturbance Net increases in residential development, either alone or in-combination with other development , within the 3.5km zone of influence are likely to have a significant effect on the Pagham Harbour SPA by means of recreational disturbance affecting bird species either alone or in combination with other developments and will need to be subject to the provisions of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended)." and "Other considerations The provisions of this policy do not exclude the possibility that some residential any development schemes either within or outside the zone of influence might may require further assessment under the Habitats Regulations. For example, large schemes, schemes proposing bespoke or alternative avoidance/mitigation measures, or schemes proposing an alternative approach to the protection of the SPA and/or the Compensatory Habitat where there is survey or other evidence	To clarify and distinguish between impacts; to avoid contradiction of AA screening process, and; to separate LNR Management Plan from mitigations	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

that the site is used as supporting **functionally linked** habitats by SPA species, including Brent Geese. Such schemes will be assessed on their own merits, under Regulation 63 (Appropriate Assessment), and subject to advice from Natural England.”

To remove the sentence from Policy NE7 (Pagham) “Net increases in residential development, which incorporate appropriate avoidance/mitigation measures, which would avoid any likelihood of a significant effect on the SPA, will not require Appropriate Assessment”

To remove reference to LNR Management Plan from Policy NE7 (Pagham)

p62	Para 4.42	Change document reference to 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions protecting them from development '	Previous document referred to has been superseded.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P63	Policy NE8 Criterion 2	Change to read: “Development resulting in the direct or indirect loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient trees and veteran trees protected trees, groups of trees and woodland and hedgerows) should be refused unless there are wholly exceptional reasons and a suitable compensation strategy in accordance with relevant legislation, policy and guidelines;”	Irreplaceable habitats examples amended to reflect definition at paragraph 180(c) of NPPF. “Direct and indirect loss” added to bring in line with para 33 of Guidance.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P63	Policy NE8 Criterion 5	Add to end of criterion: “ Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone; ”	Added to reflect Natural England and Forestry Commission Guidance on buffer recommendations.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P63	Policy NE8 Criterion 6	Add at end of criterion: “... unless there are clear, justifiable and compelling reasons why this would be inappropriate ”.	Added to reflect the NPPF.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P63	Policy NE8 Criterion 10	Add after native species: “, cultivars and near native species ”	Encourages more diversity especially where tree planting is occurring in more urban or environmentally constrained areas.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P64	Paragraph 4.47	Remove last sentence “ Development proposals within the vicinity of and which may impact the canals may be subject to Appropriate Assessment. ”	Advised by NE that sentence is erroneous as canals are not subject to any statutory nature conservation designation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P66	Paragraph 4.51	Change to read: “...its landscape qualities including the special qualities characteristics of Chichester Harbour and character of Pagham Harbour...”	To emphasise the Harbours as separate entities.	No likely significant effect. The changes made in this modification do not change the conclusions

				of original HRA and therefore there will be no impact to European sites.
P68	NE10	First paragraph change to read: "Outside settlement boundaries as defined on the policies map, planning permission will be granted for sustainable development in the countryside which requires a countryside location or meets an essential, small scale, and local need or supports rural diversification and where it can be demonstrated that all the following criteria have been met:	To ensure the policy reflects NPPF paragraphs 78 and 85, criteria from the adopted Local Plan and Reg 18 Plan has been re-inserted.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P68	NE10	Change criterion 1 to read: "The sustainability of the site is enhanced by improving or creating any opportunities to access the site by walking, cycling and public transport and linking to green infrastructure; "	To reflect NPPF paragraph 85, word "any" is added and green infrastructure reference added following rep from NE	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P68	NE10	Add to end of criterion 3: " including biodiversity whilst avoiding any adverse impact upon Nature Recovery Networks ".	To reflect NPPF paragraphs 174/179	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P69	Para 4.63	Add a new sentence at the start of the para " In June 2022 the council joined Coastal Partners, a partnership of local authorities set up to manage coastal flood and erosion risk. " In the next sentence insert " also " after "the council"	Reference to Coastal Partners requested	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P69	Para 4.63	Amend the last sentence of the para: "... Conservancy, who manage Chichester Harbour for nature conservation and landscape, the occupation of leisure and recreation, and the conservation of nature. "	Change suggested by Chichester Harbour Conservancy	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P69	Para 4.64	...Chichester Harbour SSSI and European designated sites (SAC,SPA,Ramsar)	Revised wording agreed in discussion with Natural England.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P69	Para 4.65	After the first sentence, insert a new sentence: " Much of this loss is due to hard coastal defences that constrain natural processes, habitats moving landward as sea levels increase, particularly in response to climate change – this is known as coastal squeeze. " After "bird species" insert " due in part to habitat loss and disturbance "	Additional wording agreed in discussion with Natural England	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

P70	Para 4.66	Amend para from second sentence: "Natural England is working with a number of partners including Chichester Harbour Conservancy , the Environment Agency, the council and Southern Water and not all actions to be implemented are linked to local plan policies. The Government's national Environmental Improvement Plan¹, published in early 2023, sets out targets and actions for restoring nature and the benefits it provides, to protect 30% of our land and see for nature by 2030. to implement these actions, many of which are outside of the planning system and as such not dependent on Local Plan policies.	Revised wording agreed in discussion with Natural England.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P70	Para 4.67	"The council also works has a similar working relationship with...."	More succinct	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P70	Para 4.67	Insert " (SSSI,SPA,Ramsar) " after the first mention of Pagham Harbour	Revised wording agreed in discussion with Natural England.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P70	Para 4.68	"...future of the coastline in a sustainable way . Strategies and projects will be established and /delivered by...including environmental. These SMP are non statutory and implementation is subject to funding. "	Revised wording agreed in discussion with Natural England.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P70	Para 4.69	"...the Regional Habitat Compensation and Restoration programme (HCRPRCHP), led by the Environment Agency in partnership with Natural England, Coastal Partners,..... "	Update to reflect change of name of the Programme and involvement of Coastal Partners	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P70	Para 4.70	"...REACH (Restoring Estuarine and Coastal Habitats) project which is a local delivery of the national and a range of organisations are involved in the ReMeMaRe.....potential for restoration of saltmarsh,.... "	Revised wording agreed in discussion with Natural England.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P70	Para 4.70	In the final sentence replace "Delivery" with " Business "	Technical correction	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P71	Policy NE11	Add a new sentence at the end of the first paragraph: " Undeveloped areas of low lying land around Chichester Harbour are prioritised for opportunities that actively restore coastal habitats or work with natural processes to address climate impacts and loss of biodiversity. "	Revised wording agreed in discussion with Natural England	No likely significant effect.

¹ [Environmental Improvement Plan 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/environmental-improvement-plan-2023)

				The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P71	Policy NE11	In the first bullet "...wetland habitats to help meet the 30 by 30 targets set out in the Environmental Improvement Plan 2023". Also insert a footnote with a link to the EIP.	Revised wording agreed in discussion with Natural England	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P71	Policy NE11	In paragraph below first set of bullets: "...the Regional Habitat Compensation and Restoration Programme..."	Update to reflect change of name of Programme	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P71	Policy NE11	In the next paragraph "... the opportunities for coastal/wetland habitat..."	Revised wording agreed in discussion with Natural England	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P72	Para 4.74	Amend text from second sentence: "...landward side of any sea the defences it maintains. This A 16-metre strip of land is required for access for maintenance, emergency works and/or...."	Wording clarification	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P72	Para 4.75	Delete last part of final sentence: "and to allow for future erosion at a rate of 0.1 metres per year around Chichester and Pagham Harbours"	Revised wording agreed in discussion with Natural England	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P72	Para 4.76	Add a new sentence at the end of the paragraph: "The National Coastal Risk Management work of the Environment Agency is also a consideration, particularly around Chichester Harbour where setting back development can make space for nature and floodable areas."	Revised wording agreed in discussion with Natural England	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P72	Para 4.76	Insert footnote after the new reference to National Coastal Risk Management work of the Environment Agency: National Coastal Erosion Risk Mapping (arcgis.com)	Revised wording agreed with Natural England	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and

P73	Policy NE12	<p>After introductory para, amend the numbered part of the policy as follows:</p> <ol style="list-style-type: none"> 1. "There are no harmful effects on or net loss of nature conservation or areas of geological importance, within the Chichester and Pagham Harbours and Medmerry Compensatory Habitat (including no adverse effects on the integrity of associated-European designated sites); 2. Development would not result in or exacerbate coastal squeeze of any coastal designated European site or prevent managed realignment necessary to protect the sites; 3. The development provides recreational opportunities, that does not adversely affect the character, environment and appearance of the coast and Chichester Harbour Area of Outstanding Natural Beauty or result in adverse effects of integrity to European designated wildlife site; 4. A high quality and inclusive design of new buildings in coastal locations has been achieved in accordance with other relevant design and historic environment policies; 5. There are measures in place to mitigate any detrimental effects including where appropriate the improvement of existing landscapes relating to the proposal; 6. Where appropriate, opportunities have been taken to upgrade existing footpaths and cyclepaths, enhance the England Coast Path and ensure that public access is retained and provided to connect existing paths along the waterfront; <p>6. 7. Where relevant, the development would result in improvements to or redistribution of moorings, marine berths or launch on demand facilities (dry berths) in the harbours, whilst also ensuring that any small scale loss of intertidal habitat within the designated sites is compensated for; and</p> <ol style="list-style-type: none"> 7. The development would not be detrimental to infrastructure for, and quality of, water-based recreation, or to the safety of navigation; 9. The development can demonstrate consideration of and adaptation to future climate scenarios and their potential impacts, including, but not limited to, shading, surface water flooding, erosion, wind blown sand, wave driven shingle: and 10. The development does not hinder coastal processes with regard to designated site. 	<p>Revised wording agreed with Natural England to include additional detail and improve clarity,</p> <p>Change from mean high water level to highest astronomical tide, and clarification about replacement buildings suggested by Environment Agency.</p>	<p>therefore there will be no impact to European sites.</p> <p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P73	NE12	<p>Amend text from the second para after the numbered list:</p> <p>Around Chichester Harbour and Pagham Harbour the open coast new and replacement buildings should be setback in line with expected property lifetime and estimated undefended erosion rates (based on NCERM) and at least 25 metres from the highest astronomical tide to account for erosion and make space for nature, including floodable areas which could be returned to saltmarsh.</p> <p>Around the open coast, development should be set back at least 25m from the landward edge of the existing or proposed sea defence or coast protection works in order to prevent storm damage to buildings.</p> <p>Around Chichester Harbour and Pagham Harbour the 25m setback should be measured from the mean high water level to allow for future erosion.</p> <p>Development for non-residential uses with a functional need to be closer to the water should be accompanied by an assessment of the development's vulnerability to coastal change to ensure any risk is suitably mitigated and managed and that the proposals do not hinder any coastal defence or management scheme.</p> <p>Replacement buildings will be permitted unless there is evidence that the existing or demolished property has been damaged as a result of the effect of wind and waves. Replacement buildings should be set further back whenever possible.</p>	<p>To take greater account of NCERM and to ensure replacement buildings are also set back.</p>	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P73	NE12	<p>At boatyard and marina sites within the coastal area the council will permit water compatible development associated with boat building, and the fitting out, maintenance and repair of boats and ancillary uses, provided that it does not:</p> <ol style="list-style-type: none"> a. Jeopardise the safety and ease of navigation on the water or have a detrimental impact on the regime of any the river; b. Harm nature conservation (particularly in relation to loss of intertidal habitat), landscape or heritage interests; or c. Damage water quality. 	<p>To improve clarity and include additional wording suggested by Natural England in discussions.</p>	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P74	NE12	<p>Delete last sentence of policy: A marketing report as set out in Appendix C will be needed to show that the site is no longer needed for its current use</p>	<p>Marketing requirement removed as the policy only allows exceptions where appropriate and necessary</p>	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P75	Para 4.81	<p>produced published an AONB Management Plan</p> <p>.....</p> <p>48-19.Planning Principles</p>	<p>Minor corrections from CHC rep</p>	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and</p>

P76	Policy NE13	Delete point 6: "6. New development is set back at least 25m from the mean high water level in line with Policy NE12, with replacement buildings set back whenever possible".	Unnecessary as this is covered by policy NE12 which has been revised.	therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P77	Paragraph 4.84 second bullet point	Change to read Chichester and Langstone Harbours SAC/SPA/Ramsar sites , Pagham Harbour SPA/Ramsar sites.	Correct errors in site references	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P79	NE14	Add after ecology: (including the potential to contribute to any nature recovery networks)	In response to rep from Natural England.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P81	Paragraph 4.95	Delete NPPF paragraph reference	To avoid references to the NPPF becoming out of date.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P81	N15	In the first paragraph: "Development will be directed to areas at lowest flood risk applying the sequential test and where relevant the exception test where relevant ."	In order to reflect that the sequential test as well as the exception test will not always be required.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P81	NE15	"Elsewhere, new development should be set back at least 8m from fluvial watercourses (including when within culverts) ..."	Following advice from the Environment Agency, as per rep 4841.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P81	NE15	"New site drainage systems are designed to cope with residual flood risks events that exceed the normal design standard, such as by considering flood flow routing and using temporary storage areas."	In response to representation 5644, in order to improve the clarity of the wording and ensure that the policy can be effectively implemented.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

P81	NE15	<p>"There is no increase in either the volume or the rate of surface water run-off leaving the site. Where development is on a brownfield site, run off rates should be reduced to match these on greenfield rates sites wherever possible."</p>	In response to representation 5644, in order to improve the clarity of the wording and ensure that the policy can be effectively implemented.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P82	NE15	<p>For vulnerable development, finished floor levels should be no lower than: a minimum of whichever is higher of 300mm above the:</p> <ul style="list-style-type: none"> • 300mm above average ground level of the site • 300mm above the adjacent road level to the building • 300mm above predicted significant fluvial/tidal flood level (Fluvial 1 in 100 year / Tidal 1 in 200 year plus latest climate change allowances) for the lifetime of the development <ul style="list-style-type: none"> • average ground level of the site • the adjacent road level to the building • predicted significant fluvial/tidal flood level (Fluvial 1 in 100 year / Tidal 1 in 200 year plus latest climate change allowances) for the lifetime of the development. 	Following advice from the Environment Agency, as per rep 4841. This is also suggested in another representation, 5607 (Takeham Homes), which reinforces the need for the change.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P82	NE15	<p>Add an additional clause (f):</p> <p>"f. Where applicable, any loss of flood storage from any source of flooding in the fluvial floodplain is being should be compensated for on a level-for-level basis, ideally on-site. Compensation should be hydraulically and hydrologically linked to the floodplain, but not within it."</p> <p>Associated with this amendment, change full stop at the end of e) to a semi-colon and add "and"</p>	Following advice from the Environment Agency as per rep 4841. This is in order to reflect new national guidance in the Planning Practice Guidance.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P84	Para 4.98	Add at the end of the paragraph "The Waterwise UK Water Efficiency Strategy to 2030 provides additional guidance on delivering water efficiency in the UK by 2030." (and add link to document as a footnote)	Additional useful info	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P84	Para 4.100	Insert "(WRZ)" after "Zone" in the second line. Change the second "Zone" to "WRZ"	Technical correction	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P85	Para 4.103	Replace para to read: Southern Water's Drainage and Wastewater Management Plan (DWMP) for the Arun and Western Streams is a 25 year plan that looks holistically at a range of issues in the catchment and strategic options for addressing them; such as pollution, combined sewer overflow performance, growth, water quality improvements, maintenance requirements, infiltration and flooding. Chichester District Council officers have been fully engaged in preparation of the DWMP which was published in June 2023, to ensure that proposals emerging in the Local Plan were taken into account. The DWMP feeds into OFWAT's Price Review process (PR24) which informs investment for the 2025-30 Asset Management Plan period (AMP8). DWMPs, which are now statutory, will be reviewed every 5 years to inform water company business plans for future AMP periods, allowing an iterative approach to planning for growth. More information is available on Southern Water's DWMP webpages.	Agree wording is confusing as the DWMP was not yet published. Replace whole para with an up to date para from the Statement of Common Ground	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P85	Paragraph 4.105	Insert after 110lppd "Portsmouth Water currently offer an incentive of a 50% discount on the infrastructure charge where developments demonstrate achieving high standards of water efficiency of no more than 100lppd Portsmouth Water will be installing smart metres from 2025 onwards whilst Southern Water's roll-out of smart meters has already begun."	To provide additional information in relation to water consumption.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P85	Para 4.105	Delete final sentence "Policy NE19 (Nutrient Neutrality) covers the need for nutrient neutrality in parts of the plan area" .	Does not sit well after the additional wording and is unnecessary cross referencing.	<p>No likely significant effect.</p>

P86	Policy NE16 Water Management and Water Quality	<p>In the part of the policy headed Water Efficiency: Amend last sentence of the paragraph under this heading: A tighter target applies to development in the Sussex North Water Resource Zone Southern Water's Water Resource Zone Sussex North</p> <p>(b) correct "Southern Water's Supply Zone North" to " Southern Water's <u>Water Resource Zone Sussex North</u>".</p>	Correction suggested in rep 4458/6012	<p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p> <p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P86	Policy NE16 Water Management and Water Quality	<p>In the part of the policy headed Water Quality and Wastewater:</p> <p>Criterion d) - Insert "and operation" after "delivery".</p> <p>Delete "and" at the end of criterion f and insert "and" at the end of criterion g.</p> <p>At the end of the section headed Water Quality and Waste water add new criterion (h) after g) - "Development connects to a public main sewer as the first option, and if that is not possible, provides justification for this and why a different solution is needed".</p>	Additional information/ clarification	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
Page 87	Para 4.108 – 4.113	<p>Amend text of paragraphs 4.108 -4.113 as shown below:</p> <p>4.108 Part of the Chichester plan area in the northeast of the district lies within the Sussex North Water Resource Zone (WRZ). This WRZ is supplied by the Pulborough groundwater abstraction site abstracting from the Folkestone beds of the Lower greensand/Wealden greensand semi-confined aquifer. As well as covering part of the Chichester plan area, the WRZ includes areas within Crawley Borough, Horsham District and the South Downs National Park. Within the WRZ, water is mains-distributed by Southern Water.</p> <p>4.109 The abstraction site is located on the River Arun close to a group of nature conservation sites, known as the Arun Valley Sites, that are nationally or internationally designated as Special Areas of Conservation, a Special Protection Area and Ramsar Site for their rare and protected habitats. On 14 September 2021, local planning authorities covered by the WRZ received a position statement from Natural England. This explained it could not be concluded that extraction was not having an impact on the Arun Valley Sites and that development must not add to this impact. Given the high level of regulatory protection afforded to the Arun Valley Sites as a result of their designation, this requires local planning authorities to demonstrate that development plan documents and planning decisions will not have an adverse effect on the sites. The most feasible method to achieve this, is to require that development must be water neutral (i.e. not increase the demand for water above current rates of abstraction)</p> <p>4.110 In order to ensure that water supplies can be maintained and the environment protected, the affected local authorities have worked with consultants, Natural England, Southern Water, the Environment Agency and others to produce a Water Neutrality Strategy. To deliver new development, the Strategy outlines why and how all new development must be highly water efficient to contribute to achieving water neutrality. This means that all development will need to be designed to achieve water efficiency standards above the requirements set by the optional requirements in Building Regulations – new residential development will be required to use no more than 85 litres per day and non-residential buildings required to achieve 3 credits within the BREEAM water issue category. Achieving these higher levels of efficiency will enable the strategy to provide necessary offsetting more effectively, thereby reducing offsetting costs and ensuring viability for development within the WRZ. This may include incorporating a range of measures, such as greywater recycling and rainwater harvesting into the design of new development, and fitting water saving fixtures such as flow regulators, low flush toilets, low volume bath, aerated taps and water efficient appliances (in particular, washing machines and dishwashers).</p> <p>4.111 The Water Neutrality Strategy shows that water efficient design will not be sufficient alone to achieve water neutrality, as new development would still increase the demand for water above existing levels. As a consequence, this additional demand will need to be offset against existing supplies. It is envisaged this will be achieved through demand management savings identified in Southern Water's Water Resource Management Plan, together with measures to be identified in a joint local authority and South Downs National Park Authority-led Offsetting Implementation Scheme (OIS) being prepared. Achieving high levels of water efficiency will enable the OIS to provide necessary offsetting more effectively, thereby reducing offsetting costs and ensuring viability for all development within the WRZ. Those using the OIS to offset water, will 'buy in' to the scheme at a level to ensure their development achieves water neutrality. Offsetting is expected to be provided prior to the occupation of new developments and this shall be secured through the development management process.</p> <p>4.112 The Water Neutrality Strategy provides evidence that the amount of development proposed in the affected area in this Local Plan, and in Local Plans of the other affected authorities, would not increase abstraction at Pulborough and, thus, would not negatively impact on the Arun Valley Sites. Recognising that the capacity of water offsetting the OIS can provide may be limited at particular points in time during the plan period, the authorities will have to monitor use across the WRZ and manage access to the OIS to ensure sufficient water capacity exists to ensure water neutrality is achieved when permissions are granted. Offsetting capacity in the OIS is not limitless and access will be managed by the local authorities and the SDNPA to ensure there is sufficient capacity in the OIS to demonstrate water neutrality in schemes that are approved. The authorities will publish, and keep regularly updated, a Scheme Access Prioritisation</p>	To respond to proposed amendments by Natural England (rep numbers 5826, 5827,5830) and updating for consistency and effectiveness with joint LPA policy and approach	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>

Protocol (SAPP) to show how access to the offsetting in the OIS will be managed. Infrastructure necessary to support planned growth, such as schools, will be prioritised in the SAPP.

4.113 Applicants will have to demonstrate their scheme is water neutral within a water neutrality statement submitted as part of any application within the WRZ. Should applicants not seek to utilise the OIS, **certainty of delivery of alternative offsetting will need to be demonstrated. The Water Neutrality Statement** should also provide full details of the offsetting scheme that their development would rely upon. **Similarly, certainty of alternative supply will need to be demonstrated in the Water Neutrality Statement. For connection to an alternative water company, this could be achieved by confirming that the alternative water company has sufficient capacity and will take on supply to the development. For a private supply borehole or other source of supply, this will require evidence that sufficient water supply is available to meet demand arising from the proposed development, and demonstrating with certainty that the alternative supply source does not impact upon the Arun Valley sites. To provide the necessary certainty, measures to deliver water neutrality will need to be secured through the development management process.** The council will seek to provide additional guidance to further assist applicants with water neutrality statements. Offsetting schemes can occur in any part of the WRZ, with the exception of the Bramber/Upper Beeding area in Horsham District identified on the [WRZ Map](#) – unless the development is also proposed in that area. This is on the basis water in this part of the WRZ is usually provided by a water source other than the Pulborough abstraction site.

Page 89	NE17	<p>Amend Policy NE17 as shown below, including new criterion after current 1c (moved from criterion 5), current criterion 3 split:</p> <p>1. All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. This is to be achieved by ensuring that:</p> <p>Water Efficient Design</p> <p>a) New residential development is designed to utilise no more than 85 litres of mains supplied water per person per day;</p> <p>b) New non-domestic buildings to achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard or an equivalent standard set out in any future update;</p> <p>And</p> <p>Offsetting Water Use</p> <p>c) Development proposals must demonstrate that having achieved water efficient design, any remaining mains-supplied water use from the development is offset such that there is no net increase in mains-supplied water use within the WRZ compared with pre-development levels.</p> <p>Water Neutrality Statement</p> <p>2. <u>A water neutrality statement will be required to demonstrate how policy requirements have been met in relation to water supply, water efficient design and offsetting. The statement shall provide, as a minimum, the following:</u></p> <p>a) <u>baseline information relating to existing water use within a development site;</u></p> <p>b) <u>full calculations relating to expected water use within a proposed development; and</u></p> <p>c) <u>full details of how any remaining water use will be offset.</u></p> <p>Offsetting Schemes</p> <p>3. A local authority <u>and South Downs National Park Authority (SDNPA)</u>-led water offsetting scheme will be introduced to bring forward development and infrastructure supported by Local and Neighbourhood Plans. The authorities will manage access to the offsetting scheme to ensure that sufficient water capacity exists to accommodate planned growth within the plan period.</p> <p>4. Development proposals are not required to utilise the local authority <u>and SDNPA</u>-led offsetting scheme and may bring forward their own offsetting schemes. <u>Any such development proposals will need to have regard to the local authority and SDNPA-led offsetting scheme and associated documents.</u></p> <p>5. Offsetting schemes can be located within any part of the WRZ, with the exception that offsetting will not be accepted within the Bramber/Upper Beeding area identified on the WRZ map, unless the application site is located within the Bramber/Upper Beeding area.</p> <p>Alternative Water Supply</p> <p>6. Where an alternative water supply is to be provided, the <u>Water Neutrality Statement</u> will need to demonstrate that no water is utilised from sources that supply the Sussex North WRZ. The <u>wider acceptability and uncertainty of delivery for</u> alternative water supplies will be considered on a case-by-case basis.</p> <p>5. [text moved to new criterion 2]</p> <p>Area of Serious Water Stress</p> <p>7. <u>Should the need to demonstrate water neutrality no longer be required, new residential development must be designed to utilise no more than 110 litres of mains supplied water per person per day, as per the Building Regulations optional requirement for tighter water efficiency. For non-domestic buildings, the minimum standards for BREEAM 'Excellent' within the Water category will apply. Should tighter national standards be introduced during the Local Plan period applicable for areas of serious water stress, they will be applied.</u></p>	To respond to proposed amendments by Natural England (rep number 5831) and updating for consistency and effectiveness with joint LPA policy and approach	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
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P92	4.121	Insert after "overnight stay": "Where other types of development have an impact on water quality this can be considered under policy NE 16." After "other information" insert "and guidance" after "to accompany applications" insert "and Natural England's Framework Approach for Responding to Wetland Mitigation Proposals;"	Additional information	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P92	NE19	Insert a second paragraph "Where wetlands are used as mitigation they should be designed using the Framework Approach for Responding to Wetland Mitigation Proposals."	Additional information	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P93	NE20	Add fourth paragraph: "During construction activities, pollution prevention measures should be taken on a development site including but not limited to: appropriate storage of hazardous substances; suitable management of surface water to prevent pollutants reaching watercourses and provision of equipment for containing spills."	Additional wording sought by EA to cover construction activities.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P94	Paragraph 4.128	Change to read: "... The plan area includes three 'Dark Sky Discovery Sites' designations , all located"	Correct error as DSDSs are not designations.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P94	NE21	Change penultimate paragraph to read "Proposals in, adjacent, or near to areas defined as with Dark Skies Discovery Sites designation ..."	Correct error as DSDSs are not designations.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P95	NE22	Criterion 1, add text as follows: "Development is located and designed to minimise traffic generation and congestion through access to sustainable transport modes, including maximising access to public transport routes and provision of pedestrian and cycle networks".	Amendment made to be consistent with transport policies	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P95	NE22	Criterion 4, add text as follows: Where development is likely to have a negative impact on an Air Quality Management Area, or other areas of poor air quality and/or has the potential to cause an AQMA or poor air quality , then an air quality assessment will be required.	Wording strengthened following new Environment Act's PM2.5 standards.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P97	Paragraph 4.133 and footnote	Changed hyperlink for Planning Noise Advice Document for Sussex and reference in footnote.	Document revised and in new location.	No likely significant effect. The changes made in this modification do not

				change the conclusions of original HRA and therefore there will be no impact to European sites.
P97	Paragraph 4.134	Insert " leisure " between "transport" and "commercial".	Additional reference to leisure uses sought.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P97	NE23	Revise paragraph 1 to read "Where noise sensitive development is proposed, a high-quality living environment is provided with acceptable levels of amenity for future occupiers by seeking to avoid noise that gives rise to significant adverse impacts on health and quality of life achieve an absence of significant noise disturbance or annoyance as well as"	To reflect paragraph 185a of the NPPF, Noise PPG and Noise Planning Statement, wording regarding impacts on health and quality of life is amended.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Chapter 5: Housing				
p.99	Para 5.1	Update terminology used to refer to standard method figure: "The Preferred Approach consultation on the Local Plan was based on meeting the identified objectively assessed Local Housing Needs of for the plan area of 638 dwellings per annum ² (dpa) plus an allowance for accommodating unmet need arising from the Chichester District part of the South Downs National Park.	Update to reflect latest terminology in PPG	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.99	Paragraph 5.3	Update position on Duty to Cooperate: "In order to meet the requirements of the duty to cooperate the council have approached neighbouring and other authorities to see whether they may be able to meet any of Chichester's unmet needs. Most of The neighbouring authorities are faced with similar constraints and are unable to assist at this time . The latest position will be is set out in the Duty to Cooperate Statement of Compliance."	Update to reflect latest position	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P100	Policy H1	Table updated to reflect latest monitoring data (see separate Appendix)	Update to reflect latest position	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P101	Paragraph 5.6	Additional sentence at the end of the paragraph to clarify approach to speculative permissions within parishes with a strategic location: "Paragraph 5.10 also applies to parishes with a strategic location" .	Clarity on approach for consistency with other parish housing numbers	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P104	Paragraph 5.9	Housing sites for Chichester city will be allocated through the preparation of a neighbourhood plan or the a subsequent development plan document and, if the latter is the case , this may include sites adjoining the Chichester city settlement boundary in neighbouring parishes (including sites separated from the settlement boundary by the A27).	Consistency with Policy wording	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and

² Housing and Economic Development Needs Assessment (April 2022)

p.104	Paragraph 5.10	Text should say 5 or more not 6.	Figure carried forward from adopted plan but out of date due to PPG update in 2019.	therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
p.107	H4 Affordable Housing	Delete reference to appendix 1 in 3.	Incorrect reference	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites..
p.107	H4 Affordable Housing	Add reference to 'equivalent' financial contribution to criteria 2 and 3.	To make it clearer that it will be an equivalent contribution	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P111	Policy H6 Custom and/or Self Build Homes	Amend percentage requirement for self/custom build on strategic sites. "In all other instances 2% 5% of market units provided on strategic scale housing sites should be self/custom build." This will also need to be reflected in the relevant site-specific allocation policies, A8 (Land East of Chichester), A10 (Land at Maudlin Farm), A11 (Highgrove Farm) and A13 (Southbourne Broad Location for Development).	To respond to latest evidence of need, which shows a higher need level than was the case at the time of the Reg.19 consultation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P113	Paragraph 5.31	Amend to clarify: "For the purposes of rural exception sites , this policy a 'local connection' is set out in the rural allocations policy contained in the council's allocations scheme ³ . For first homes exceptions sites, 'local eligibility criteria' is set out in First Homes guidance ⁴ "	Clarification	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P113	Paragraph 5.34	Amend to clarify: "National policy sets out that First homes exception sites only need to be 'primarily' for First homes and hence can include a small market housing component where it can be demonstrated it is necessary to ensure overall viability . However, the inclusion of a market housing component will need to be robustly justified, taking into account the requirements set out in this regard in national policy and guidance".	Clarification	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P114	Paragraph 5.38	Amend to clarify: "The scale of the development should be appropriate proportionate to the size of the settlement. Proportionate should be determined with regard to the form, scale and established pattern of the settlement. However, sites will be unlikely to be considered proportionate in size if they would lead to an increase in the number of homes in a settlement by more than 5%, or if they would have an area exceeding 1ha., defined in the NPPF as not larger than one hectare, or exceeding 5% of the size of the existing settlement "	Clarification	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and

³ <https://www.chichester.gov.uk/applyhousingregister>

⁴ ADD LINK

P114	Paragraph 5.39	Remove reference to the council's Planning Obligations and Affordable Housing SPD.	No longer producing the Planning Obligations and Affordable Housing SPD.	therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P115	Policy H7 Rural and First Homes Exception Sites	<p>Amendments to policy:</p> <p>Criteria 1 "There is an identified local housing need which cannot be met by existing, <u>allocated</u> or <u>future-permitted</u> affordable housing provision;"</p> <p>Delete Criterion 2: "Proposals for rural exception sites are for up to 30 dwellings;"</p> <p>Criterion 4 "Occupiers can demonstrate a local connection; to the parish in the first instance, and the immediately surrounding parishes in the second instance;"</p> <p>Second part of the policy: "In addition to the requirements above, pProposals for first homes exception sites, except in designated rural areas, will be supported where all of the following criteria are met:</p> <p>8. <u>a) The site delivers primarily first homes;</u> 9. <u>b) There is a need for first homes which is not being met elsewhere in the plan area;</u> 10. <u>c) The homes will remain first homes in perpetuity;</u> 11. <u>d) The first homes provided are occupied by first-time buyers who meet the local connection test;</u> 12. <u>e) The site is located adjacent or as close as possible to the existing settlement boundary and does not result in scattered or isolated development in rural areas and</u> 13. <u>f) The scale of the proposal size of the site is proportionate to the size of the existing settlement to which it is adjacent, reflects the landscape character of the area and would be well related to the settlement..."</u></p> <p>Applications for first homes exception sites that propose the inclusion of a small proportion of market housing will be expected to provide robust evidence that the site would be unviable without such housing being included.</p>	Amendments made in response to representations.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P116	Heading	Amend title of section to 'Specialist Housing accommodation for older people and those with specialised needs'	Amended to better reflect aim of policy to support specialist housing for those of different ages and needs	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P116	Paragraph 5.42	Add subheading after paragraph 5.42 'Extra Care Housing'	To respond to proposed amendments by West Sussex County Council (rep number 5094) to make it clearer that Extra Care Housing is supported for all ages.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P116	Paragraph 5.43	Amend 'To help provide accommodation for those of different ages and with different support needs, West Sussex County Council supports the provision of extra-care housing rather than traditional care homes	To respond to proposed amendments by West Sussex County Council (rep number 5094) to make it clearer that Extra Care Housing is supported for all ages.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P122	H10 Accessible and Adaptable Homes	Point a) to be updated to: "a). 5% of affordable housing must meet wheelchair accessibility standards M4(3)((2)(b)) where there is an identified need on the Housing Register and the council will have nomination rights. "	Updated in response to rep number 4980. Part of Building Regs and previously only in background text.	No likely significant effect.

P123	Paragraph 5.60	<p>Factual updates to reflect new version of PPTS published December 2023:</p> <p>The Government’s Planning Policy for Traveller Sites (PPTS 202315) requires councils to assess and meet gypsy, traveller and travelling showpeople’s accommodation needs. Meeting this need has the same level of importance as every other housing need within the plan area. PPTS was 2015 updated in 2023, to the effect that the definition of travellers for planning purposes now includes again to no longer include those gypsies and travellers who have ceased to travel permanently. However, the needs of all travellers still have to be met in an appropriate manner.</p>	Factual updates to reflect new version of PPTS published December 2023	<p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p> <p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>																				
p.123	5.61	<p>Factual updates to reflect new version of PPTS published December 2023:</p> <p>A new Gypsy and Traveller and Travelling Showpeople Accommodation Assessment was completed in 2022 (GTAA) in order to inform the new Local Plan, which builds on the previous joint study undertaken in 2018/19, which was produced on behalf of a group of Coastal West Sussex Authorities. The need requirement, as per the new GTAA is set out below. However, this is based on the definition of travellers as set out within PPTS 2015, as that was the relevant version at the time the GTAA 2022 was completed.</p>	Factual updates to reflect new version of PPTS published December 2023	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>																				
p.123	Table 5.1	<p>Factual updates to reflect new version of PPTS published December 2023:</p> <table border="1" data-bbox="543 867 1466 1203"> <thead> <tr> <th></th> <th>2024 - 29⁵</th> <th>2029 – 34</th> <th>2034 – 2039</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Households who meet the PPTS 2015 definition⁶</td> <td>90</td> <td>17</td> <td>17</td> <td>124</td> </tr> <tr> <td>Households whose status is unknown but may meet the PPTS 2015 definition</td> <td>3</td> <td>1</td> <td>2</td> <td>6</td> </tr> <tr> <td>People living in caravans but established in the GTAA as not meeting the PPTS 2015 definition.</td> <td>20</td> <td>4</td> <td>4</td> <td>28</td> </tr> </tbody> </table>		2024 - 29 ⁵	2029 – 34	2034 – 2039	Total	Households who meet the PPTS 2015 definition ⁶	90	17	17	124	Households whose status is unknown but may meet the PPTS 2015 definition	3	1	2	6	People living in caravans but established in the GTAA as not meeting the PPTS 2015 definition.	20	4	4	28	Factual updates to reflect new version of PPTS published December 2023	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
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p.124	Table 5.2	<p>Factual updates to reflect new version of PPTS published December 2023:</p> <table border="1" data-bbox="543 1266 1466 1602"> <thead> <tr> <th></th> <th>2024 – 29</th> <th>2029 – 34</th> <th>2034 – 2039</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Households who meet the PPTS 2015 definition</td> <td>24</td> <td>4</td> <td>5</td> <td>33</td> </tr> <tr> <td>Households whose status is unknown but may meet the PPTS 2015 definition</td> <td>2</td> <td>2</td> <td>3</td> <td>7</td> </tr> <tr> <td>Travelling showpeople established in the GTAA as not meeting the PPTS 2015 definition.</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>		2024 – 29	2029 – 34	2034 – 2039	Total	Households who meet the PPTS 2015 definition	24	4	5	33	Households whose status is unknown but may meet the PPTS 2015 definition	2	2	3	7	Travelling showpeople established in the GTAA as not meeting the PPTS 2015 definition.	0	0	0	0	Factual updates to reflect new version of PPTS published December 2023	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
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P124	Para 5.62	<p>Delete final sentence of the paragraph: The Council will also consider allocating additional pitches via the forthcoming Allocations DPD.</p>	<p>This is a factual update which reflects that the Council is no longer able to bring forward a separate allocations DPD. Consequently, residual need will need to be tackled through a review of the Local Plan.</p>	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>																				

⁵ This includes the figure from the base date of the GTAA, which is 2022, so this period is effectively a 7 year period.
⁶ This category includes a proportion of the undetermined need (30%), as per the methodology used by the consultants who produced the GTAA.

P124	Para 5.64	Correct typo: However, the council cannot rely heavily on that approach, as it is will be less effective at meeting the short-term needs.	Correction of typo.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.125	Policy H11 – Meeting Gypsy and Traveller and Travelling Showpeople Needs	Factual updates to reflect the changes to PPTS in 2023: <ul style="list-style-type: none"> 124 additional permanent residential gypsy and traveller pitches (for those who meet the PPTS 2015 definition) of which 90 pitches are required before 2029; 34 additional pitches will be needed for those who don't didn't meet the PPTS 2015 definition; and 40 additional plots for travelling showpeople, of which 26 are required before 2029. 	Factual updates to reflect new version of PPTS published December 2023.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.125	Policy H11 – Meeting Gypsy and Traveller and Travelling Showpeople Needs	Amend sentence within the policy to include reference to travelling showpeople: All gypsy and traveller and travelling showpeople pitches/plots provided must comply with the site design policy (Policy H14).	Amended for clarification as that policy (H14) does also apply to travelling showpeople.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.125	Policy H11 – Meeting Gypsy and Traveller and Travelling Showpeople Needs	Amendment to the effect that the requirement to make provision on speculative sites only pertains to sites in the southern plan area: "In addition to the site allocations within the Local Plan, in the event of any non-allocated housing sites coming forward for development in the southern plan area... "	Reps 5045, 5756 make reference to the appropriateness of locations for pitches. This isn't considered to be valid in relation to the southern plan area, but is in relation to the northern plan area, as there is virtually no need in that area.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.125	Policy H11 – Meeting Gypsy and Traveller and Travelling Showpeople Needs	Amendment to reflect change to PPTS in 2023: (whether they that meet the Planning Policy for Traveller Sites 2023 definition or not)	Amended to reflect the update to PPTS in 2023. The reference to all travellers in the Reg.19 version was in order to ensure that there was no discrimination against travellers who have ceased to travel. However, that issue is addressed by the amended definition within PPTS 2023.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.126	Policy H11 – Meeting Gypsy and Traveller and Travelling Showpeople Needs	Delete the following text within the policy: Where there is a shortfall in provision, sites will be allocated within a Site Allocation DPD. The council's annual monitoring process will help ensure provision is provided at the appropriate time.	This is a factual update which reflects that the Council is no longer able to bring forward a separate allocations DPD. Consequently, residual need will need to be tackled through a review of the Local Plan.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.126	Policy H11 – Meeting Gypsy and Traveller and Travelling Showpeople Needs	Additional text added at the request of Natural England: "In all cases, proposals for gypsy, traveller and travelling showpeople's accommodation are expected to contribute to relevant access management strategies to mitigate recreational disturbance to SPAs in accordance with Policy NE6 (Chichester's Internationally and Nationally Designated Habitats), and Policy NE7 (Development and Disturbance of Birds in Chichester, Langstone and Pagham Harbours and Solent and Dorset Coast SPAs, and Medmerry Compensatory Habitat)."	Text proposed by Natural England in rep. number 6127. This in order to provide clarification. The representation was made in relation to H13, but as it pertains to all pitches, it is probably best to apply to the overarching policy, namely H11.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.127	H12 – Intensification sites	The Stables site should also be subject to conditions placing limits on its long-term use in order to address the future flood risk concerns pertaining to the site, and this will address the consistency point raised above regarding how this site compares to the travelling showpeople plots to the north. In addition, the policy should also list personal permissions as a mechanism for dealing with future flood risk, as the flood risk is likely to only be relevant a considerable period into the future i.e. beyond the lifetime of any personal conditions granted over the course of the plan period.	Amended in response to representation 4472 which raises concerns regarding discrepancy in approach between the Stables and Five Paddocks Barn/Mans Rest sites. The personal consents option has been proposed in order to provide further flexibility for how the flooding issues can be addressed.	No likely significant effect. The changes made in this modification do not

		The amended wording is as follows: <ul style="list-style-type: none"> • “The Stables on Bracklesham Lane, 1 additional pitch (temporary or personal consents owing to future flood risk) • Five Paddocks Farm, Bracklesham, 2 additional travelling showpeople plots (temporary or personal consents owing to future flood risk).” 		change the conclusions of original HRA and therefore there will be no impact to European sites.
p.127	H12 – Intensification sites	An amendment is proposed in order to address the situation whereby consents are granted before the Local Plan is adopted, as the number of pitches proposed relates to the position at the time of the Pitch Deliverability Capacity Assessment in December 2022. This would be as follows: The number of additional pitches specified is in addition to the number of pitches on the site which have had been granted planning permission at the time of the adoption of the Local Plan time of the Pitch Deliverability Capacity Assessment in December 2022.	The amendment is in response to concerns raised in representation 5248 whereby it seems that additional pitches may be consented on sites between the time of the capacity study and adoption of the new Local Plan.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.129	New paragraph after 5.77	An additional paragraph is proposed in response to representation 5630 (Henry Adams obo West Sussex County Council) which query the amount of space required for travelling showpeople plots in connection with the Bognor Road employment site (policy A20). The Council has proposed to amend the wording in that instance to make the policy more flexible. However, it is considered that it would be helpful to provide some indication regarding the site size which is likely to be necessary, and as this is a general principle rather than a site specific one, it is proposed to include that wording in the supporting text for policy H14 rather than A20. The additional paragraph of supporting text proposed is as follows: “Travelling showpeople sites entail all of the amenity considerations associated with other traveller sites, however, they also require large areas for the storage and repair of equipment. These areas can vary considerably in terms of size. Analysis of the size of plots is set out in the Council’s Gypsy and Traveller and Travelling Showpeople background paper . This sets out that the average travelling showpeople plot size in the plan area is 1500 sq.m and consequently this provides an indication of the area which should be planned for when providing travelling showpeople plots. Sites will need to include suitable areas of hardstanding for the storage and repair of fairground equipment. Clearly, such large storage and maintenance areas have implications in terms of residential amenity and landscape impact, which will require very careful consideration when devising site layouts and assessing relevant applications.”	In order to provide greater clarification regarding travelling showpeople plot sizes in response to representation 5630.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Chapter 6: Place making, Health and Well-being				
132	Paragraph 1	New paragraph after National Design Guide characteristics list: “ The Council will progress a design code(s) for the plan area following the adoption of the Local Plan and will also support the production of design codes as part of the neighbourhood planning process. ”	Added in response to various representations (primarily 4291, 5745 and 5859), which sought to highlight the importance of design codes, particularly at the local level.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
132	Paragraph 1	“All development shall achieve a high quality design, consistent with the ten characteristics set out in the National Design Guide (or any subsequent amendment) which accords with the National Design Guide (as amended or replaced with any subsequent version). The ten key characteristics of the National Design Guide can be summarised as follows...: This change also needs to be reflected in bullet 2 under “Consistency must also be achieved with the following...” “All Design and Access statements submitted in support of applications shall clearly explain how the proposed development delivers all of the above principles complies with all relevant sections of the National Design Guide,... ”	Amended in response to representation which highlighted the need to clarify requirements in relation to adherence to the National Design Guide.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
132	Paragraph 1	Within point A regarding sustainable design add the words “ wherever possible ” after “including”	Amended in response to various representation which requested greater flexibility in relation to this requirement.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
132	Paragraph 1	Modification in relation to when sustainability statements are required: “All development proposals Proposals for new residential and commercial development, including replacement dwellings... ”.	Amended in response to representation which questioned whether it is reasonable to expect a sustainability statement to be provided for all development.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

139	Paragraph 6.20	Modification to supporting text as follows "Where boundaries are exposed to the public realm or shared open space, such as communal gardens or parking, the use of timber close board fences will be resisted in place of higher quality, and more durable <u>or natural</u> approaches, <u>such as planting, railing or masonry</u> ."	Clarification to ensure a range of alternatives to fencing are considered.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
139	Paragraph 6.23	Modification to supporting text as follows: "Development proposals including public realm must be proactively designed to anticipate and respond to these changes <u>by seeking and</u> maximising opportunities for sustainable drainage and biodiversity functions <u>mitigations and adaptations</u> . Within external spaces and landscaping this could include, for example, seeking and optimising opportunities for shade and green infrastructure <u>such as trees to provide solar shading and cooling via transpiration, or</u> sustainable drainage systems that w Whilst being functional, these features are designed...".	To clarify climate change mitigations and adaptations, and emphasise the cooling as well as shading benefits of trees therein.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
141	Paragraph 5	Amend criterion 2 as follows "Will not leave or result in the creation of undefined <u>or</u> poorly integrated or poorly lit areas with no clear function."	Clarification to avoid assertion that all open space should be lit.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
141	Paragraph 5	Removal of criterion 7	Removed to avoid narrow interpretation, inconsistent with PPG; matter considered to be comprehensively addressed by NE15	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
141	Paragraph 5	Amend criterion 8 as follows: "...and the retention of existing trees <u>and hedgerows</u> (unless..."	Amended to ensure consistency with Policy NE8	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
141	Paragraph 5	Amend criterion 9 to read: "Proposals should contribute positively to connecting existing green infrastructure corridors <u>networks, connecting existing green and blue infrastructure assets and spaces</u> , and <u>seeking</u> to create new ones."	Amended to emphasise the inclusion of blue infrastructure assets within green infrastructure networks, ensuring consistency with the NPPF and national guidance	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
141	Paragraph 5	Amend criterion 10 as follows: "...and where possible are positioned to provide additional solar shading benefits, <u>such as solar shading and cooling</u> , to both external and internal spaces"	Amended to emphasise the cooling as well as shading benefits of trees.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
p.142	New paragraph between 6.31 and 6.32	Relocation and reconfiguration of text deleted from P6 as follows: <u>Appropriate separation distances between dwellings</u> will be considered <u>agreed</u> on an individual site and design basis, <u>allowing a range of scenarios including front-to-front, front-to-side and back-to-back to be considered, as well as</u> considering aspects such as density, scale, height differences and site levels. It will	Added to clarify requirements surrounding separation distances.	No likely significant effect. The changes made in this modification do not

		generally be expected that, within a back-to-back scenario, no less than 21 metres is proposed between facing principal windows of habitable residential rooms and windows of other uses that could result in significant overlooking. In circumstances where land levels vary or the difference in building heights is greater than one storey longer distances may be required. Shorter distances will be permitted where they are necessary to secure the positive reuse of a historic building or are consistent with the character of the local area subject to it being demonstrated that an appropriate level of amenity for existing and future occupiers would be achieved.		change the conclusions of original HRA and therefore there will be no impact to European sites.
143	Paragraph 6	<p>Modification of paragraph relating to housing space standards as follows:</p> <p>"In the following cases, the gross internal floor area of All new dwellings (excluding purpose-built student accommodation, hotels, residential institutions) shall meet as a minimum the nationally described space standards (or any subsequent standards) including:</p> <p>a) All dwellings in new build developments, regardless of tenure. b) Where practicable, having regard to the physical constraints of the existing building, changes of use and conversions.</p> <p>Built-in internal storage areas are included within the overall minimum gross internal areas. Garages, balconies, detached ancillary buildings and communal areas shared with other dwellings will not be considered to contribute towards meeting the minimum space standards.;</p>	Amended to provide clarity to ensure ready interpretation and implementation of required NDSS	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
144	Paragraph 6	<p>Modification and deletion of paragraphs relating to separation distances as follows:</p> <p>"Development shall maintain suitable separating distances between the windows of habitable rooms in dwellings (principal living rooms, principal dining areas, bedrooms and kitchens where there is not a separate dining room) and the windows and walls of other properties to ensure that an appropriate level of amenity is provided and retained for all residential occupiers.</p> <p>It will generally be expected that no less than 21 metres is proposed between facing principal windows of habitable residential rooms and windows of other uses that could result in significant overlooking. Appropriate distances will be considered on an individual site and design basis considering aspects such as density, scale, height differences and site levels.</p> <p>In circumstances where land levels vary or the difference in building heights is greater than one storey longer distances may be required. Shorter distances will be permitted where they are necessary to secure the positive reuse of a historic building or are consistent with the character of the local area subject to it being demonstrated that an appropriate level of amenity for existing and future occupiers would be achieved."</p>	Amended to clarify requirements surrounding separation distances.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
151	Paragraph 6.52	Modification to supporting text as follows: "...to locally important historic buildings and trees. "	Amended to recognise the heritage significance of trees, ensuring consistency with national guidance.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
156	Paragraph 11	Amendment to Criterion A.2. as follows: "Protecting or enhancing the setting (including views into and out of the area)"	Amended to ensure consistency with the NPPF and statutory requirements in terms of the setting of heritage assets.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
157	Paragraph 6.74	<p>Amendments to the supporting text as follows:</p> <p>"The identification of non-designated heritage assets throughout the plan area will be justified by consistent assessment against selection criteria to determine heritage significance subject to change over time as more assets are identified. Proposals affecting non-designated heritage assets buildings and structures will be permitted where their identified architectural, archaeological or interest, historic interest, positive contribution to their rural or townscape setting, and/or external appearance are sustained or enhanced in accordance with established conservation best practice."</p>	Amended to clarify broad categories assessed during the non-designated heritage asset identification process.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
158	Paragraph 12	<p>Amendment of criteria at 2. as follows:</p> <p>2. In order to be considered The identification of non-designated heritage assets, buildings, historic areas, street furniture and designated landscapes will require be assessed against criteria within the following criteria broad categories:</p>	Amended to clarify broad categories assessed during the non-designated heritage asset identification process.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions</p>

		<p>a) Buildings of high-quality traditional design, detailing and appearance which make good use of historic materials;</p> <p>b) Buildings which are good examples of vernacular or traditional types;</p> <p>c) Buildings which contribute towards their surroundings or street scene or have important local, historical or social associations.</p> <p>a) Historic interest;</p> <p>b) Architectural or artistic interest;</p> <p>c) Archaeological interest;</p> <p>d) Contribution to Setting;</p> <p>e) External appearance.</p>		of original HRA and therefore there will be no impact to European sites.
158	Paragraph 12	<p>Amendment of criteria at 4. as follows:</p> <p>4. The council will require applicants for development proposals which involve excavation or ground works on sites which include or have the potential to include heritage assets with of archaeological interest potential to:</p> <p>a) Submit an archaeological assessment and evaluation of the site, including the impact of the proposed development, and, should it be indicated that significant remains may be present, an evaluation of the site;</p> <p>b) Preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and seek a public display and interpretation where appropriate;</p> <p>c) Undertake proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to preserve significance and advance understanding.</p>	Amended to clarify policy requirement, ensuring a proportionate response to development proposed on sites which include or have the potential to include heritage assets with archaeological interest, in accordance with the NPPF.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
159	Paragraph 13	Amendment of criterion at 4 as follows: "Preserve or enhance the setting (including views in and out)"	Amended to ensure consistency with the NPPF and statutory requirements in terms of the protection of the settings of heritage assets.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
161	Paragraph 14	<p>Amendment of first sentence as follows:</p> <p>"...will be expected to contribute to the provision of additional green and blue infrastructure, and the protection and enhancement of existing green and blue infrastructure..."</p>	Amended to emphasise the inclusion of blue infrastructure assets within green infrastructure networks, ensuring consistency with the NPPF and national guidance	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
161	Paragraph 14	<p>Amendment of criterion at 2 as follows:</p> <p>"Where appropriate, the proposals create new green infrastructure which is appropriate proportionate to the scale, type and wider context of the development proposal, and is integrated into the development design and meets the needs of the communities within and beyond the site boundaries."</p>	Amended to ensure policy is proportionate, sufficiently flexible and able to take account of site-specific circumstances.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
161	Paragraph 14	<p>Amendment of criterion at 4 as follows:</p> <p>"The proposals maximise opportunities to enhance and link to active travel cycling and walking routes, including existing public rights of way as well as multi-user routes."</p>	Amended to emphasise that proposals for new development will be expected to provide integrated and enhanced active travel including public rights of way.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
161	Paragraph 14	<p>Amendment of criterion at 5 as follows:</p> <p>"The proposals maximise opportunities to link to nature recovery networks, including in accordance with the Local Nature Recovery Strategy."</p>	Amended to refer to emerging statutory requirements for Local Nature Recovery Strategies.	<p>No likely significant effect.</p>

				The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
161	Paragraph 14	Amendment of final sentences as follows: "Proposals for development that would otherwise harm existing green infrastructure network assets will only be granted if they can incorporate sufficient mitigation measures that sufficiently mitigate its effects to benefit the GI network's wider functions, connectivity, quality and/or extent. "	Amended to recognise that proposals impacting or altering existing GI may be granted if sufficient mitigation, bringing benefits to the wider GI network, can be demonstrated.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
163	Paragraph 6.92	The study also recommends standards for certain indoor sports facilities including sports halls, swimming pools, synthetic pitches, and health and fitness stations. The Local Plan seeks to ensure that existing facilities are protected and where needed positive improvements are achieved. The Indoor and Built Sport and Leisure Facility Needs Assessment (2024), which covers certain indoor sports facilities including sports halls, swimming pools and fitness facilities, highlights a number of priorities for new or enhanced provision of these facilities that will be needed in the future. The Needs Assessment (or future update) will be used to guide future investment needs arising from development for indoor sports facilities. Sport England's 'Sports Facility Calculator' may also be utilised for the facility types held on their database (this is principally swimming pools, sports halls and indoor bowls centres).	Updated to reflect latest Indoor and Built Sport and Leisure Facility Needs Assessment (2024)	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
162 - 167		Updates to reflect latest evidence studies		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
164	Paragraph 6.94	Reference to 2011 census replaced with 2021 census.		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
164	Table 6.1	Table 6.1 will be amended to show an additional line to add the threshold for indoor facilities with reference point to state that provision depends upon average household size (table 6.2); local circumstances and quantity and access standard (table 6.4)	Amended to provide clarification in response to various representations.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
164	Table 6.2 Average Household size	Amend title of second column to (Census 2021) Amend 1 bedroom to read 1.3, Amend 2 bedroom to read 1.9, Amend 3 bedroom to read 2.3 No change to average occupancy to 4+ bedroom	Amended to bring study up to date with most recent census information as of 2021	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
165	Policy P15 Open Space, Sport and Recreation Table 6.3	Amend text in table, first column, third row to insert word 'Sport' so it will read: 'Parks, Sport and Recreation Grounds (1)	Correction of omission of word	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and

165 Policy P15 Open Space, Sport and Recreation Table 6.4

Wording in introduction to Table 6.4 needs to be revised to remove reference to hectares. The sentence should end after the word facilities.

Amended to provide clarification in response to various representations.

Table to be updated as follows:

Indoor Facility	Quantity Standard per 1000 population	Access Standard Drive-time or walking in urban areas
Swimming Pools—Based on 4 lane x 25m pool unit*	10.05 sqm; or 0.042 pools	Within 15 to 20 minutes
Sports Halls—Based on 4 x badminton court hall unit	0.26 courts; or 0.065 halls	Within 15 to 20 minutes
Health & Fitness—Based on individual stations (pay and play access)	5 stations, subject to viability	Within 20 minutes
Indoor sports facilities	See the Indoor and Built Sport and Leisure Facility Needs Assessment	No standard set
Small community halls**	<p>1 venue for each settlement of 500 people.</p> <p>Each new development generating 500 or more people will be assessed by the Council as to what facilities are required proportionate to the scale of development proposed. However, each new development of 2,500 people will require a new facility</p> <p>The standard will be applied flexibly in liaison with the council to best meet local circumstances. The aim should not be (for example) to create a proliferation of small community venues in areas of growth where fewer larger venues would be more appropriate. Contributions arising from this standard may also be used towards the enlargement/improvement of existing venues (whether on-site or nearby off-site) where appropriate.</p> <p>1 further venue for each additional 2,500 people but with flexibility of interpretation.</p> <p>A small community hall will be required to provide:</p> <p>A main hall to be used for a variety of recreation and social activities, of at least 18m x 10m; a small meeting/committee room; kitchen; storage; toilets; provision for disabled access and use; car parking.</p> <p>Overall a total net floor space of 300 sqm will be used as a minimum guide for the building.</p> <p>A larger hall will be needed where an identified need for badminton or other sports and health and fitness facilities as local needs determine.</p> <p>The standard will be applied flexibly in liaison with the council to best meet local circumstances. The aim should not be (for example) to create a proliferation of small community venues in areas of growth where fewer larger venues would be more appropriate.</p> <p>Contributions arising from this standard may also be used towards the enlargement/improvement of existing venues (whether on-site or nearby off-site) where appropriate.</p>	600 metres or 15 minutes straight line walk time, but 15 minutes drive-time might be acceptable in rural areas.

therefore there will be no impact to European sites.

No likely significant effect.

The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

		Footnote will be added to reference to swimming pools in table 6.4. to show that it could be funded from CIL.		
		A footnote will be added to table 6.4 to make it clear that Sports halls and Health and Fitness facilities can be provided in small community halls as local needs determine. – so applied flexibly.		
167	Policy P15 Open Space, Sport and Recreation	A cross-reference to the definition in paragraphs 6.84 will be added at the start of the policy showing the definition of open space	Amended to provide clarification in response to representation number 1573 (5500).	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
167	Policy P15 Open Space, Sport and Recreation	Reference inserted in paragraphs 6.88, 6.91 and 6.95 to include reference to the Open Space, Sport and Recreation Study including Indoor Sports Facilities and Playing Pitch Strategy review 2024.	Amended to bring the original study up to date	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
169	Policy P16: Health and Well-being	Criteria 1 of the Policy is to be removed due to overlap with Policy I1 Infrastructure Provision: “For new housing, the provision of land or financial contributions from new development, where appropriate and viable, towards new or enhanced healthcare facilities where new housing results in a shortfall or worsening of provision; For new housing developments, the provision of land will be secured via S106 agreements. CIL contributions will be used to fund improvements to healthcare facilities as set out in the council's Infrastructure Business Plan (IBP)”	Amended to avoid repetition in the Plan	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
170	Policy P16: Health and Well-being	Delete number '6' as threshold is not part of list of requirements. Amend threshold to include floorspace “Development proposals for over 50 dwellings or 1,000sqm , along with development proposals that may have an impact on health will require submission of a Health Impact Assessment”.		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Chapter 7: Employment and Economy				
172	Paragraph 7.1	West Sussex County Economic Strategy should read West Sussex Economy Plan	Correction	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
173	Paragraph 7.8	...“provision is made for flexible employment/leisure space within the neighbourhood centre at some of the new strategic site allocations (Chidham and Hambrook and Land East of Chichester (A8) for flexible working space to be provided within local centres/community hubs buildings, and local employment provision will also be made through neighbourhood plans, and at the Southbourne Broad Location for Development.”	Correction as the policy for Chidham and Hambrook doesn't include this.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
173	Paragraph 7.10	Add hyphen to Rolls-Royce	Correction	No likely significant effect. The changes made in this modification do not

				change the conclusions of original HRA and therefore there will be no impact to European sites.
174	Policy E1	Under Identified sources of supply: Change 31 st March 2022 to 31 st March 2023 and the completions figure from 3,695 to 7,106.	Updated now 2022/23 figures are available.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
174	Policy E1	Update permissions figure from 53,655 to 53,190	Updated now 2022/23 figures are available.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
174	Policy E1	Amend floorspace figure for Land West of Chichester from "22,000" to "20,800" and the total supply from "444,652 to "116,388".	The 22,000 figure was taken from an outline planning application for Stage 2 of the development. In light of an objection seeking removal of the floorspace which was not considered appropriate, the floorspace has instead been calculated using a 40% plot ratio in line with other calculations. Total amended due to this and other updates.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
176	Policy E2	Criterion 5 to read "For office developments class E(g) , that the sequential test set out in national policy has been met,..."	Amended to clarify that criterion 5 applies to office developments only.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
178	Paragraph 7.22	Amend as follows: "... Approximately, 67 hectares is identified as necessary to meet the future horticultural land need within HDAs over the plan period based on past trends . However, given the historical pattern of horticultural development outside of HDAs, an additional 137 hectares of horticultural land is also forecast to be required outside of HDAs to meet future need.	Amended to provide further clarity on the basis for predicting future horticultural need.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
178	Paragraph 7.24 ii	Amend as follows: ".....The HDA will be extended at its southern boundary to include a further 30 21 hectares of land promoted by the horticultural industry for horticultural and functionally-linked development (as defined in policy E4) . The extension to the Runcton HDA is as shown on the policies map."	Proposed extension of the Runcton HDA is reduced to satisfy Natural England's concerns regarding the Strategic Wildlife Corridor. Insertion of "functionally-linked" following objections from the horticultural industry.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
179	Policy E3, second paragraph	Amend as follows: "...The remaining horticultural development need will be accommodated in a planned extension at the southern boundary of Runcton HDA which comprises some 3021 hectares of land."	Proposed extension of the Runcton HDA is reduced to satisfy Natural England's concerns regarding the Strategic Wildlife Corridor.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

178 - 183	Paragraphs 7.24, 7.25 and Policy E3 and E4	Change "ancillary" to " functionally-linked " throughout.	Amendment made to the definition of activities associated with horticultural development to address the objections from the horticultural industry.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
180	Paragraph 7.29	Delete last two sentences: " The council considers that the HDAs should remain available for growing and packing horticultural products and other processes directly related to their production. These other processes are classed as ancillary development ".	Amendment made in light of representations from horticultural industry.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
180	Between Paragraphs 7.29 and 7.30	Insert: " The council is committed to ensuring that planning policies assist the national and international competitiveness of the district's horticultural industry during the local plan period. It is recognised that there is a demonstrable business need to deliver development that is functionally-linked to the growing of produce within HDAs in order to support the vitality and viability of the industry. Functionally-linked developments are likely to include, but are not limited to, storage and distribution facilities, food processing and packaging, research and development and the production of renewable energy/provision of energy hubs. The council considers it important to ensure that new developments within HDAs are retained for horticulture, or purposes functionally-linked to horticulture, in order to ensure the competitiveness of the industry is maintained. The council will use planning conditions and/or planning obligations where appropriate to achieve this aim. In order for a proposal to be considered as functionally-linked development, the planning application will need to demonstrate considerable benefits of co-location within the HDA (i.e. the contribution to local synergies and/or the reduction in food miles and in carbon emissions). "	Amendment made to address the objections from the horticultural industry.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
180	Paragraph 7.30	Amend first sentence: "Smaller scale horticultural development will continue to be focused within the existing HDAs at Sidlesham and Almodington."	Factual correction	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
181	Paragraph 7.36	Amend last sentence: The Arun and Western Streams Abstraction Licensing Strategy (March 2019 June 2022) sets out the current situation within the Chichester District.	Strategy updated.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
182	Policy E4, second para	Amend as follows: "Within designated HDAs, as shown on the policies map, planning permission will be granted for new horticultural and functionally-linked ancillary development where it can be demonstrated that the following criteria (1-10) have been met ".	Amendment made to the definition of activities associated with horticultural development to address the objections from the horticultural industry.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
182	Policy E4	Insert new criterion 1 and 2 as follows: 1) The development will be used solely for horticulture and/or purposes functionally-linked to horticulture. Functionally-linked development may include: a) propagation and growing of horticultural produce within or outside buildings; b) the processing and packaging of food items, c) the storage and distribution of produce, processed foods and associated packaging; d) research and development and office functions which relate to horticulture and/or horticultural food production;	Amendment made to address the objections from the horticultural industry.	

		e) renewable energy production where the primary recipient/user of the energy produced are located within or adjacent to the HDA.		
		2) If the proposal is for functionally linked development, the proposal demonstrates considerable benefits of co-location (i.e. the contribution to local synergies and/or the reduction in food miles and in carbon emissions);		
182	Policy E4 Criterion 5	Amend as follows: "The height and bulk of development, either individually or cumulatively, does not have a significant adverse effect upon damage the character or appearance of the surrounding countryside, landscape or setting of the SDNP and mitigation measures are included to address any detrimental effects e.g. in order to mitigate the height and bulk of new horticultural structures."	Amendment made to address objections from horticultural industry and Natural England.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
182	Policy E4 Criterion 9	Amend as follows: ".....The proposal enhances and protects the Strategic Wildlife Corridors and ensures the impact of development on the strategic wildlife corridors has been minimised,"	Amendment follows concerns regarding impacts upon the Strategic Wildlife Corridors.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
183	Policy E4	Numbers in brackets are corrected to reflect policy criteria numbers.	Correction	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
183	Policy E4 final para	Reference to strategic wildlife corridors policy inserted.	Reference to Strategic Wildlife Corridors policy sought.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
193	Policy E8 Criterion 2	Amend as follows: "It is located so as not compromise the essential features of internationally designated areas and nationally designated areas of landscape,....."	Amendment to correct omission	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
195	Policy E9	New criterion between criteria 5 and 6: They are located so as not compromise the essential features of internationally and nationally designated areas of landscape, historic environment or nature conservation protection, including impacts from visitors or users of the facilities, particularly in relation to the potential for increased recreational pressures on Chichester Harbour, Pagham Harbour, Medmerry Compensatory Habitat and other designated sites;	Criterion carried forward from Policy E8 at request of Natural England to include criterion relating to designated sites.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
195	Policy E9	criterion 8 is amended as follows: "Whether the accommodation is within an area at risk of flooding as defined by the Environment Agency; "	Amended for consistency with criterion 6 and to reflect SFRA evidence	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

Chapter 8: Transport and Accessibility

198-203	Paragraphs 8.5 – 8.22 and Policy T1	See separate appendix to this document.	Changes following extensive engagement post Regulation 19 with National Highways and WSCC and additional evidence to support approach	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
199	Paragraph 8.9	Replace 'three' with 'four' – These three four objectives...	Correction	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
201	Policy T1	1 st Bullet: "Avoiding or reducing minimising the need to..."	Response to representation	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
102	Policy T1	Modification to Policy T1 to make it clear that applicants are not responsible for all of criteria 1-7 . E.g.: "All parties, <u>(including applicants where relevant)</u> , are expected to..."	Response to representation	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
201	Policy T1	Criterion 3: "...integrated bus and/or train services..."	Response to representation	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
202	Policy T1	Amend paragraph starting with 'Opportunities to secure... (after criterion 7) as follows '...will be sought from all new housing development in the south of the plan area... '	Amended to clarify that A27 contributions will only be sought from new development in the south of the plan area.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
204	Policy T2	in 1 i) "Ensure that where new delivery access accessing or servicing is..."	Amended in response to representation	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
204	Policy T2	In Clause 1 j) "Provide or contribute towards site-specific transport mitigation..."	Amended in response to representation	No likely significant effect. The changes made in this modification do not

	Policy T2	Add new clause to 3: “3. d) appoint a Travel Plan Co-ordinator whose role will be to oversee the implementation of the Travel Plan and use the outcome of monitoring to review its targets to ensure continued relevance.”	Added in response to representation	change the conclusions of original HRA and therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
	Policy T2	To be consistent with NPPF para 113, revise paragraphs 2 and 3 of Policy T2 as follows: Paragraph 2: “Proposals for development which are likely to result in significant transport impacts must be supported by a Transport Assessment and Travel Plan.” Paragraph 3: “A Travel Plan will be required from all proposals for development which generate significant amounts of movement. Travel Plans should encourage sustainable travel choices...”	Amended in response to representation	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
206	Paragraph 8.24	Add the following sentence to the end of the paragraph: “The Public Rights of Way (PRoW) network provides extensive walking and cycling opportunities and important links between places in the local plan area.”	Added in order to address objection by West Sussex County Council.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Chapter 9: Infrastructure				
211	Policy I1 (iv)	Replace text which says ‘ Future-proof infrastructure provision to take account of the impacts of climate change ’ and replace with ‘Appropriate mitigation and adaptation measures should be made following a risk assessment (natural-hazards-infrastructure.pdf (publishing.service.gov.uk) to build in resilience for infrastructure over its lifetime to take account of the impacts of climate change such as....	Amended in response to rep number 7291 (5680) In order to provide clarification of the policy intent	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
211	Policy I1 (v)	At the end of the sentence add a new one to read ‘The ongoing costs of infrastructure management and maintenance that is the responsibility of statutory providers and utility companies will continue to be met by those businesses’	Amended in response to rep number 8065 (4831) in order to provide clarification of the policy intent	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
211	Policy I1 (vii)	Point (vii) will be amended to read: ‘Ensure new development benefits from gigabit-capable broadband infrastructure (where such facilities are local available) at the point of occupation’	Amended in response to several representations in order to provide clarification of the policy intent	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Chapter 10: Strategic and Area based policies				
214	Policy A2	Delete “a minimum of” and replace with “approximately”	For consistency	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and

				therefore there will be no impact to European sites.
215	Policy A2	Amend criterion 12 and renumber: "Proposals for development within a Minerals Safeguarding Area will need to accord with Policy M9: Safeguarding Minerals of the West Sussex Joint Minerals Local Plan (or updated version). A Mineral Resource Assessment may be required prior to any development being consented, which addresses the relevant requirements set-out in the West Sussex Joint Minerals Local Plan. Consider (if within the Minerals Safeguarding Area) the implication of development on safeguarded minerals in line with the West Sussex Joint Minerals Local Plan (Policy M9) and the Minerals and Waste Safeguarding Guidance, to assess whether the land contains economically viable minerals that would require extraction prior to development to avoid permanent sterilisation. "	Amended in order to address objection from WSCC	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
215	Policy A2	Add new criterion and renumber: "Consider the implication of development on safeguarded minerals and waste infrastructure in the vicinity to ensure development does not prevent or preclude any waste management uses, as required by Policies W2 and W10 of the West Sussex Waste Local Plan or the operation of minerals infrastructure as required by Policy M10 of the West Sussex Joint Minerals Local Plan and the Minerals and Waste Safeguarding Guidance."	Amended in order to address objection from WSCC	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
215	Policy A2	Include new criterion and renumber: "Ensure that green infrastructure provision is well related to the overall layout and character of the development and how it relates to its surroundings, as well as providing opportunities to connect to the existing green infrastructure network"		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
216	Paragraph 10.13	Replace "is likely to" with "will" and add additional text after "bus stops": as part of the transport hub approach set out in the West Sussex County Council (WSCC) Bus Improvement Plan. A transport hub is defined as "railway station, bus stops, toilets, electric vehicle charging points (EVCP), bike racks, café and car parking in close proximity."	Amended to clarify what a transport hub means here.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
216	Paragraph 10.16	Delete second sentence .	Change requested by WSCC in post reg 19 discussions on consistency between policies	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
217	Policy A3	Amend 5 th bullet : Be designed to encourage and facilitate increased use of active travel and public transport to, from and through the city centre.	Amended to strengthen wording	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
217	Policy A3	Insert 2 additional bullets: <ul style="list-style-type: none">Consider the implication of development on safeguarded minerals in line with the West Sussex Joint Minerals Local Plan (Policy M9) and the Minerals and Waste Safeguarding Guidance, to assess whether the land contains economically viable minerals that would require extraction prior to development to avoid permanent sterilisation. Consider the implication of development on safeguarded minerals infrastructure in the vicinity to ensure development does not prevent or prejudice the operation of minerals infrastructure as required by Policy M10 of the West Sussex Joint Minerals Local Plan and the Minerals and Waste Safeguarding Guidance.	Change requested by WSCC in post reg 19 discussions on consistency between policies	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

217	Policy A4	Add " approximately " in front of "110 dwellings"	For consistency	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
217	Policy A4	In point 3 amend wording : ".....National Cycle Routes 2 and 288 Route 88-..."	Bill Way Cycle Route 88 has been renumbered as National Route 288	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
218	Policy A4	Replace " treatment " with "disposal" in bullet 9	Amended to ensure that conveyance to the treatment works is covered as well as treatment capacity at the works.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
218	Policy A4	Amend bullet 13 : " the most recent Infrastructure Delivery Plan as updated by the Infrastructure Business Plan. "	Amended for accuracy/ consistency	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
218	Policy A4	Replace point 15 with 2 new points: 15. Consider the implication of development on safeguarded minerals in line with the West Sussex Joint Minerals Local Plan (Policy M9) and the Minerals and Waste Safeguarding Guidance, to assess whether the land contains economically viable minerals that would require extraction prior to development to avoid permanent sterilisation; and 16. Consider the implication of development on safeguarded minerals infrastructure in the vicinity to ensure development does not prejudice the operation of minerals infrastructure as required by Policy M10 of the West Sussex Joint Minerals Local Plan and the Minerals and Waste Safeguarding Guidance.	Change requested by WSCC in post reg 19 discussions on consistency between policies	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
219	Policy A5	Insert " approximately " before "70"	Amended for consistency	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
220	Policy A5	Change "Route 88" to "Route 288" in point 11.	Amended to reflect numbering change on designation as a national cycle route	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
220	Policy A5	Replace " treatment " with " disposal " in bullet 13	Amended o ensure that conveyance to the treatment works is covered as well as treatment capacity at the works.	No likely significant effect. The changes made in this modification do not

220	Policy A5	Amend bullet 14 : " the most recent Infrastructure Delivery Plan as updated by the Infrastructure Business Plan. "	Amended for accuracy/ consistency	change the conclusions of original HRA and therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
220	Policy A5	Replace point 15 with 2 new points: 15. Consider the implication of development on safeguarded minerals in line with the West Sussex Joint Minerals Local Plan (Policy M9) and the Minerals and Waste Safeguarding Guidance, to assess whether the land contains economically viable minerals that would require extraction prior to development to avoid permanent sterilisation. 16. Consider the implication of development on safeguarded minerals infrastructure in the vicinity to ensure development does not prevent or prejudice the operation of minerals infrastructure as required by Policy M10 of the West Sussex Joint Minerals Local Plan and the Minerals and Waste Safeguarding Guidance.	Change requested by WSCC in post reg 19 discussions on consistency between policies	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
221	Paragraph 10.19	Add " <u>with nursery and SEND provision</u> " after "teaching accommodation".	Added to address objection by WSCC.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
221	Paragraph 10.20	Add " <u>with nursery and SEND provision</u> " after "teaching accommodation". Delete words " and pavilion " from description of Phase 2 development.	Added to address objection by WSCC. Pavilion was provided as part of Phase 1.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
221	Paragraph 10.20	Amend "...The agreed -framework for phase two provides..."	Factual accuracy.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
222	Paragraph 10.21	Insert new bullet point after bullet point 9: " Any new additional culverts are kept to an absolute minimum and designed in such a way so as to limit their impact on the watercourse; "	Added to address objection from the Environment Agency.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
222	Paragraph 10.21	Change bullet point 10 to read: Increasing capacity to attenuate surface water on site, thereby reducing the discharge flows off the site to reflect greenfield <u>rates below current rates, and reducing the risk of flooding to residential areas downstream;</u>	Wording changed to be consistent with criterion 13.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
222	A6 Second bullet point	Insert E(g)(iii) Business use	To correct omission	

222	A6 Third bullet point	Add " <u>to include nursery and SEND provision</u> " after "primary school".	Added to address objection by WSCC.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
223	Policy A6 Criterion 6	Delete in accordance with NE5 (Biodiversity and Biodiversity Net Gain) , and amend ".....Brandy Hole Copse Local Nature Reserve.....".	Amended as unnecessary to make specific reference to policy full name. Error with nature site name corrected.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
223	Policy A6 Criterion 11	insert at end of sentence " <u>issues and the provision of on-site SANG land;</u> "	To correct omission as well as reflect the provision of on-site SANG in both phases of the development.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
223	Policy A6 Criterion 12b	Add " <u>Ensure new additional culverts are kept to an absolute minimum and designed so as to limit their impact on the watercourse;</u> "	Added to address objection from the Environment Agency.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
223	Policy A6 Criterion 13	Delete the word " and ".	Correct error.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
223	Policy A6 Criterion 14	Change to read: " Demonstrate capacity of sewer network to accommodate the conveyance and treatment of wastewater (to strict environment standards) from the proposed development. <u>Development will be dependent on the provision of infrastructure for adequate wastewater conveyance and treatment to meet strict environmental standards;</u> "	Amended to provide clarity, wording has been amended to reflect the policy wording in the adopted local plan for this site allocation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
223	Policy A6 Criterion 15	Delete: Occupation of the development will be phased to align with the delivery of wastewater infrastructure. Insert the word " and " at end of sentence.	Unnecessary as dealt with at criterion 14.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
223	Policy A6 Criterion 16	Change to read: "Proposals for the development should have regard to the West Sussex County Council Minerals <u>Plan Safeguarding Area</u> and associated guidance."	Amended to address issue raised by WSCC.	No likely significant effect. The changes made in this modification do not

226	Paragaph 10.26, last bullet point	Change to read: "Taking account of the West Sussex Joint Minerals Local Plan , Waste Local Plan , and associated guidance, in relation to the site being within a defined Minerals Safeguarding Area and in close proximity to safeguarded waste infrastructure. "	For consistency, amendment requested by WSCC.	change the conclusions of original HRA and therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
227	A7 Criterion 12	Change to read: "Proposals for the development should have regard to the West Sussex County Council Minerals Safeguarding Area, safeguarded waste infrastructure and associated guidance."	Amended to address issue raised by WSCC.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
230	Para 10.35, last bullet point	Amend to read "Account taken of the West Sussex Joint Minerals Local Plan, Waste Local Plan, and associated guidance the Minerals and Waste Safeguarding Guidance , in relation to the site being within a defined Minerals Safeguarding Area and in close proximity to safeguarded waste sites."	Amended to address issue raised by WSCC.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
231	Policy A8	Amend bullet point 1 to read: "Development to include approximately 680 dwellings, including..."	For consistency	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
231	Policy A8	Amend number of self/custom build units required on the site: "Development to include 680 dwellings, including ten 34 suitable serviced plots to provide self/custom build housing;"	Amended to respond to latest evidence of need, which shows a higher need level than was the case at the time of the Reg.19 consultation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
231	Policy A8	Amend bullet point 3: "A neighbourhood centre incorporating local shops, a community centre, flexible space for employment/ small-scale leisure uses and a one- two-form entry primary school with provision for early years/ childcare and special educational needs and disability;"	Amended to address issue raised by WSCC.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
231	Policy A8	Amend criterion 4: "Conserve and enhance the historical significance of the listed Shopwyke Grange and the cluster of buildings associated with the grade II* listed Shopwyke Hall which should be analysed at an early stage of the masterplan;"	Amended to address issue raised in representation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

231	Policy A8	Amend criterion 6: "Provide for appropriate hard and soft landscaping, including street trees, a substantial and effective an appropriate buffer with significant planting to the strategic wildlife corridor on the eastern boundary of the site..."	Amended to address issue raised in representation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
232	Policy A8	Amend criterion 7: "Ensure that green infrastructure provision is well related to the overall layout and character of the development and how it relates to its surroundings. This will include creating linkages throughout the site to the wider countryside, Tangmere, Oving and development at Shopwyke Lakes;	Amended to address issue in representation that GI network should include Oving	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
232	Policy A8	Amend criterion 12: "Provide for improved sustainable travel modes and new improved cycle and pedestrian routes, including linkages with Chichester, Westhampnett, Tangmere and Oving; "	Amended to address issue raised in representation	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
233	Policy A8	Amend criterion 18 to correct reference to " Minerals and Waste Safeguarding Guidance"	Amended for consistency of wording.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
235	Paragraph 10.36	Change Rolls Royce to read Rolls-Royce	Correction.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
237	Policy A9 Criterion 12	Change to read: "Proposals for the development should have regard to the West Sussex County Council Minerals Plan Safeguarding Area and associated guidance."	To address issue raised by WSCC – consistency of wording.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
239	Paragraph 10.40	Change Rolls Royce to read Rolls-Royce	Correction.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
239	Paragraph 10.41	Replace 6 th bullet point with: Account taken of the West Sussex Joint Minerals Local Plan and associated Minerals and Waste Safeguarding Guidance, in relation to the site being within a defined Minerals Safeguarding Area.	Consistency of wording in relation to safeguarding of mineral resources.	No likely significant effect. The changes made in this modification do not

240	Policy A10	Insert "approximately" before "265"	For consistency.	change the conclusions of original HRA and therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
240	Policy A10	Amend number of self/custom build units required on the site: "265 dwellings, including 413 serviced self/custom build plots;"	To respond to latest evidence of need, which shows a higher need level than was the case at the time of the Reg.19 consultation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
240	Policy A10	In second sentence of criterion 5 delete the word 'highway' so it reads: '... requisite contributions for off-site highway improvements in conformity ...'	Amended to address issue raised in representation and reflect that Policies T1 and T2 are not solely concerned with 'highway' improvements but transport infrastructure more widely, including sustainable modes of travel.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
240	Policy A10	Amend the first sentence of criterion 5 to read: 'Provide safe and suitable access points for all users, including a main vehicle access from Old Arundel Road and, subject to further assessment, a secondary vehicle access from Dairy Lane. '	Amended to address issues raised in representation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
240	Policy A10	Add additional criterion: 'The development will need to be phased in such a manner to ensure that sufficient wastewater disposal capacity is available to accommodate the requirements resulting from this development'	Added to address issue raised in representations and consistency with other strategic allocations.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
241	Policy A10	Amend bullet 13 : " the most recent Infrastructure Delivery Plan as updated by the Infrastructure Business Plan. "	Amended for accuracy/ consistency.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
241	Policy A10	Replace criterion 14 with: Consider the implication of development on safeguarded minerals in line with the West Sussex Joint Minerals Local Plan (Policy M9) and Minerals and Waste Safeguarding Guidance, to assess whether the land contains economically viable minerals that would require extraction prior to development to avoid permanent sterilisation⁷	Consistency of wording in relation to safeguarding of mineral resources.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and

⁷ Guidance on the application of the Joint Minerals Local Plan and Waste Local Plan safeguarding policies is available in the [West Sussex County Council Minerals and Waste Safeguarding Guidance](#)

244	Policy A11	Amend first bullet point: "A minimum of Approximately 245 dwellings..."	Amended for consistency.	therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
244	Policy A11	Amend number of self/custom build units required on the site: "...245 dwellings, including 412 suitable serviced plots to provide self/custom build housing;"	Amended to respond to latest evidence of need, which shows a higher need level than was the case at the time of the Reg.19 consultation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P244	Policy A11	Amend criterion 4: "Providing for appropriate hard and soft landscaping, including street trees and buffer planting to the north, south, west and east of the site..."	Amended to address representation made by Forestry Commission.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
244	Policy A11	Amend bullet 13: " the most recent Infrastructure Delivery Plan as updated by the Infrastructure Business Plan. "	Amended for accuracy/ consistency.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
248	Policy A12	Amend first paragraph: " a minimum of approximately 300 dwellings..."	Amended for consistency.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
248	Policy A12	Amend bullet 12: " the most recent Infrastructure Delivery Plan as updated by the Infrastructure Business Plan. "	For accuracy/ consistency.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
249	Policy A12	Delete criterion 13 and replace with: "If a site is within the Minerals Safeguarding Area consider the implication of development on safeguarded minerals in line with the West Sussex Joint Minerals Local Plan (Policy M9) and the Minerals and Waste Safeguarding Guidance, to assess whether the land contains economically viable minerals that would require extraction prior to development to avoid permanent sterilisation"	Amended for consistency of wording in relation to safeguarding of mineral resources.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

249	Policy A12	Add additional criterion 14: “Consider the implication of development on safeguarded waste management sites in the vicinity, to ensure development of the site does not prevent or prejudice any waste management uses, as required by Policies W2 of the West Sussex Waste Local Plan’ and the Minerals and Waste Safeguarding Guidance.”		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
251	Paragraph 10.56	Amend paragraph 10.56, third bullet point to read: ‘.. cycling and pedestrian routes including linking to the National Cycle Network Route 2 along the A259 and proposed enhancements as part of the Chichester to Emsworth Cycle Path (ChEm Route);	Amended to address issue raised in representation and emphasise creation of sustainable transport links.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
251	Paragraph 10.56	Add new 6 th and 7 th bullet points to read: Account taken of the West Sussex Joint Minerals Local Plan, and associated Minerals and Waste Safeguarding Guidance, in relation to the sites within the parish being within a defined Minerals Safeguarding Area. Account taken of the West Sussex Waste Local Plan and associated Minerals and Waste Safeguarding Guidance in relation to the safeguarding policy W2.	Added for consistency of wording in relation to the Minerals and Waste Local Plans and Safeguarding Guidance.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
251	Policy A13	Amend criterion 1 to read: “...provide approximately 1,050 dwellings”	For consistency	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
251	Policy A13	Amend number of self/custom build units required on the site: “Provide an appropriate mix of housing types, sizes and tenures to meet evidenced local need including affordable housing and specific provision to meet specialised housing needs including 4653 serviced self/custom build plots, accommodation for older people and accessible and adaptable homes in accordance with relevant Plan policies;”	Amended to respond to latest evidence of need, which shows a higher need level than was the case at the time of the Reg.19 consultation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
252	Policy A13	Amend bullet 6: “ the most recent Infrastructure Delivery Plan as updated by the Infrastructure Business Plan.”	For accuracy/ consistency	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
252	Policy A13	At end of criterion 9 add: ‘and facilitates the achievement of biodiversity net gain and the creation of high levels of habitat connectivity within the site, the wider green infrastructure network and identified strategic wildlife corridors’	To address issue raised in representation and consistency with other housing site related policies.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
252	Policy A13	Amend wording of criterion 10 to read: ‘Provide mitigation to ensure the avoidance of Avoid, and if necessary, mitigate any adverse effects on the SPA, SAC and Ramsar site at Chichester Harbour ‘	To better reflect the mitigation hierarchy	No likely significant effect. The changes made in this modification do not

252	Policy A13	Replace criterion 16 with: If a site is within the Minerals Safeguarding Area consider the implication of development on safeguarded minerals in line with the West Sussex Joint Minerals Local Plan (Policy M9) and the Minerals and Waste Safeguarding Guidance, to assess whether the land contains economically viable minerals that would require extraction prior to development to avoid permanent sterilisation.	For consistency of wording in relation to safeguarding of mineral resources.	change the conclusions of original HRA and therefore there will be no impact to European sites. No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
253	Policy A13	After criterion 16 add new criterion to read: Consider the implication of development on safeguarded waste management sites in the vicinity, to ensure development of the site does not prevent or prejudice any waste management uses, as required by Policy W2 of the West Sussex Waste Local Plan and the Minerals and Waste Safeguarding Guidance.	For consistency of wording in relation to safeguarding of waste management sites.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
256	Policy A14	Amend criterion 3: "Expanding and enhancing the existing local centre Incorporate new or expanded community facilities, including transforming the existing village centre into a new local centre providing new village centre amenities;"	Countryside representation.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
256	Policy A14	Amend criterion 10: "Conserve or enhance the heritage and archaeological interest of the site, the historic village and its setting (particularly that of the Conservation Area) and the World War II airfield, including making provision for the relocation of the existing allotment space to facilitate the potential expansion or relocation of the Tangmere Military Aviation Museum;"		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P258	Map 10.8	Amend map to remove land immediately to the west of Saxon Meadow	To reflect planning application/land being CPO'd	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
259	Paragraph 10.70	Additional bullet point to para 10.70 ' Account taken of the West Sussex Joint Minerals Local Plan, and associated Minerals and Waste Safeguarding Guidance, in relation to sites within the parish being within a defined Minerals Safeguarding Area for clay'	WSCC representation number 5092	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
259	Paragraph 10.70	Additional bullet point to para 10.70 ' Development should not increase flood risk elsewhere, taking into account risks from all sources of flooding in accordance with Policy NE15'	EA representation	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

260	Policy A15: Loxwood	Amend first paragraph to read: "...a minimum of approximately 220 dwellings"	For consistency	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
260	Policy A15: Loxwood	Amend criterion 10: " the most recent Infrastructure Delivery Plan as updated by the Infrastructure Business Plan. "	For accuracy/ consistency	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
260	Policy A15: Loxwood	Additional criterion (11) 'If a site is within the Minerals Safeguarding Area consider the implication of development on safeguarded minerals in line with the West Sussex Joint Minerals Local Plan (Policy M9) and the Minerals and Waste Safeguarding Guidance, to assess whether the land contains economically viable minerals that would require extraction prior to development to avoid permanent sterilisation.	WSSC representation	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
261	Paragraph 10.71	The Goodwood Estate lies to the immediate north of Chichester and is known worldwide as a global brand. The Estate through its range of businesses provide very significant economic, environmental and cultural benefits to a wide area, not just to Chichester District, but also regionally and nationally. The contributions made are well documented, with the Estate, together with its tenant, Rolls-Royce, delivering very significant sums annually to these economies. According to an independent study by the London School of Economics, during 2022⁸ the Goodwood Estate generated an estimated economic contribution of £444m into the national economy, including £133m in tax contributions, and of which, £323m was of benefit to the local economy directly (including £108m in tax contributions). Since 2003, Rolls Royce has contributed more than £4 billion to the UK economy and annually the contribution exceeds £500m⁹ Both Goodwood and Rolls Royce are major local employers, directly and in the supply chain. Motor Circuit and Airfield represent significant leisure and tourism destinations within the plan area, particularly on special occasions such as the Goodwood Revival and Festival of Speed, where a significant number of visitors are attracted to the sites. The economic and cultural benefits to the wider area are well documents with research from the University of Brighton showing that the 2014 Festival of Speed brought in over £25 million to the area as well as a further £35.5 million turnover for the national economy.	Updated wording agreed in discussion with the Goodwood Estate. A further update to the socioeconomic study was provided during these discussions, post Reg19.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
261	Paragraph 10.72	The council remains supportive of the ongoing operation of the site as a motor circuit and airfield, recognising that these are central to the revenue stream of the Estate. These operations are subject to the existing legal agreements, permissions and other arrangements that ensure activities can operate in a manner that is not harmful to material considerations such as noise, traffic and environmental concerns. secured which impose noise control restrictions For example, the motor circuit has to adhere to trackside decibel levels and activity is limited through category days, while at the airfield measures such as Noise Preferential Routes (NPRs) and restrictions on the number of annual flights (both fixed wing and rotary) are imposed. Continued beneficial operation is encouraged and the council recognises the need for an effective, yet flexible, range of controls (including planning permissions and legal agreements) that are responsive to change and which bring about an enhancement to the offer of the Circuit and Airfield, as well as continued control over environmental issues.	Amended wording agreed in discussion with the Goodwood Estate.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
261	Footnote	Replace the footnote reference with reference to a more recent study: https://research.brighton.ac.uk/en/publications/economic-impact-of-the-goodwood-festival-of-speed The Goodwood Estate Socioeconomic Contribution 2022, Dr Alexander Grous, July 2023.	Goodwood Estates representation and subsequent discussions	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
261-2	Policy A16	In the first para: "...recreation, and leisure and business activities in connection with or ancillary to the existing use at Goodwood Motor Circuit and Airfield. This may include changes to existing permissions and agreements where flexibility is appropriate, provided the proposal does not conflict with other policies of the Plan."	Revised wording agreed in discussion with Goodwood Estate. Final para deleted as it is covered by the next policy A17.	No likely significant effect.

⁸ The Goodwood Estate – Socioeconomic Contribution: 2022' by Dr Alexander Grous, London School of Economics (published July 2023)

⁹ Rolls-Royce Motor Cars Pressclub article 27.04.2023

		<p>In point 2: The character of the area site and its environs should be retained conserved and reinforced;</p> <p>In point 3: The Any proposed..”</p> <p>At end of point b: and” At end of point c and” New point d: d. it will allow the airfield to operate in compliance with the Government’s General Aviation Handbook.”</p> <p>Delete final para : “Any development proposals within the vicinity of the site must clearly demonstrate how the development would protect, and where possible enhance, the operation and heritage of the site as a motor circuit and airfield.”</p>		The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
262	Footnote	Insert new footnote – linked to point d above: General aviation handbook - GOV.UK (www.gov.uk)	Goodwood Estates representation and subsequent discussions	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
262	Paragraph 10.74	In the last sentence: “residential or noise sensitive development.”	Goodwood Estates representation and subsequent discussions	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
262	Paragraph 10.75	<p>Split the paragraph in 2 between “emanating from the site” and “The report also”.</p> <p>After “emanating from the site” add “ and does not otherwise compromise any provision of Policy A16.”</p> <p>In what is now the next paragraph :”The 400m should not be interpreted as a distinct policy boundary as the report...”. Later in the same paragraph insert “detailed and focussed” before “noise impact assessment”</p> <p>Insert a further new paragraph: “As set out in the NPPF, existing businesses and facilities should not have unreasonable restrictions placed upon them as a result of development permitted after they were established. This will be a consideration when any development in the vicinity is proposed. “</p>	Goodwood Estates representation and subsequent discussions	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
263	Policy A17	<p>In the first para insert “and demonstrably” before “shows that”</p> <p>In point 3 insert after “Airfield” “,nor place unreasonable restrictions on such operation,”</p> <p>Insert a new point 4: “4. Development will be resisted where is will compromise the ability of the airfield to operate in compliance with the Government’s General Aviation Handbook.”</p>	Goodwood Estates rep and subsequent discussions	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
264	Paragraph 10.78	Change to read as follows: “...Solent Waders and Brent Goose ecological network. The Environment Agency are also developing a habitat creation scheme in partnership with the Ministry of Defence and Chichester Harbour Conservancy through managed realignment of the coast at the south-western edge of Thorney Island barracks. In addition, Ddevelopment would also need to be compatible with the Chichester Harbour AONB.....”	To address concerns raised by The Environment Agency, Sussex Wildlife Trust and Mayday! Action Group regarding references to habitat creation schemes/managed retreat.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
265	Policy A18	Third paragraph of Policy – change to read: “All development proposals should seek to enhance the overall character of the Island as well as support opportunities for habitat creation- whilst avoiding adverse impacts on existing habitat creation schemes. Proposals must also mitigate any adverse impacts on local infrastructure and ecology....”	To address concerns raised by The Environment Agency and Sussex Wildlife Trust regarding references to habitat creation schemes.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and</p>

				therefore there will be no impact to European sites.
268	Paragraph 10.83	...the Chichester Gravel Pits and Leythorne Meadow Local Wildlife Site (LWS) SCNI	Correction	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
268	Paragraph 10.87	Replace the final bullet point with 2 new bullets: <ul style="list-style-type: none"> Account should be taken of the West Sussex Joint Minerals Local Plan and associated Minerals and Waste Safeguarding Guidance, in relation to the site being within a defined Minerals Safeguarding Area Account should be taken of the West Sussex Waste Safeguarding Guidance, in relation to the safeguarding policy W2.	Wording suggested by WSCC in post Reg 19 discussion, for consistency.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
269	Policy A20	Revise first para: A 19.5ha site is allocated for: Employment uses, to accommodate at least 28,000sqm of employment floorspace; and And 5 plots for travelling showpeople (if there remains a need for plots at the time of the determination of the planning application), with adequate ancillary storage requirements	For consistency with other allocations	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
269	Policy A20	In point 7: Chichester Gravel Pits and Leythorne Meadow Local Wildlife Site Nature Reserve.	Correction	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
269	Policy A20	Replace point 12 with : Consider the implication of development on safeguarded minerals and waste infrastructure in the vicinity to ensure development does not prevent or prejudice any waste management uses, as required by Policies W2 and W10 of the West Sussex Waste Local Plan or the operation of minerals infrastructure as required by Policy M10 of the West Sussex Joint Minerals Local Plan and the Minerals and Waste Safeguarding Guidance.	Wording suggested by WSCC in post Reg 19 discussion, for consistency.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
272	Title	Insert a hyphen between Rolls and Royce (here and throughout the plan)	Correction suggested by Rolls-Royce	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
P272	Paragraph 10.88	Amend wording: This policy provides a framework to support the proposed extension to the Home of Rolls-Royce, which is crucial to its long term viability continued expansion and long term viability of Rolls-Royce Motor Cars. The future shape of low-volume, high-value automotive production is dynamic and the industry must be able to respond to evolving requirements remain responsive to known, unpredicted needs and economic conditions, both known and unknown . The policy is essential to provide Rolls-Royce with certainty that the manufacturing plant could continue to expand production from the current 56,000 units per year. This necessitates will require an increase in manufacturing space, associated logistics operations and space for other uses. Because of uncertainty around the timing of growth when preparing this Local Plan, The requirements cannot be precisely specified at the current time the policy is based on safeguarding the land for future needs.	To update supporting text to reflect latest information and improve clarity.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

272	Paragraph 10.89	Insert " significantly " after "have grown" at the end of the second sentence. In the third sentence delete " output of " and amend 5,000 to 6,000 .	To improve clarity and update figures.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
272	Paragraph 10.90	Amend 2,000 to 2,500 in first sentence. Amend from 3 rd sentence: Since the launch of the programme in September 2006, the volume of apprentices number joining the scheme hasve steadily increased. Rolls-Royce Motor Cars (RRMC) seeks to nurture future talent by offering almost 100 students from across the globe a 13-month paid internship across all areas of the business, including assembly, interior surface, interior trim, quality management, commercial and administrative roles. There are around 100 active apprentices at RRMC at any given time, who are offered full time roles in the company upon successful completion of the programme. The apprenticeship lasts for up to four years and around 100 people have joined the company as a result, a number of former apprentices have progressed into leadership roles."	To update supporting text to reflect latest information and improve clarity.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
272	Paragraph 10.91	Replace "expansion" with " growth " and hyphenate Rolls-Royce		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
272	Paragraph 10.92	Amend start of para: " The proposed extension expansion land is located in close proximity to..."	"Extension" suggested by Rolls-Royce. Other deletions are of superfluous wording.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
272	Paragraph 10.94	Replace "expansion" with " extension ".		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
272	After paragraph 10.94	Insert a new para: The site lies within a Minerals Safeguarding Area, as defined by the West Sussex Joint Minerals Local Plan.	Additional wording requested by WSCC	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
273	Paragraph 10.95	Insert " proposed " before the first reference to "site" and change the second reference to "the site" to " this area ".	Change suggested by Rolls-Royce	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
273	Policy A21	Change at to in in the first para.	Change suggested by Rolls-Royce	No likely significant effect. The changes made in this modification do not

273	Policy A21	<p>Insert a new point 7 with minor consequential amendments to 5 and 6:</p> <p>5.Any adverse impacts on the landscape and setting of the South Downs National Park are first avoided, then mitigated; and 6.Access into the South Downs National Park is maintained through diversion and protection of the existing footpath; and 7.Car parking will be managed in the shift changeover periods to minimise delay on the local highway network. This will be supported by a Car Parking Strategy.</p>	Additional wording about parking resulted from a meeting with Rolls Royce	<p>change the conclusions of original HRA and therefore there will be no impact to European sites.</p> <p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
P273	Policy A21	Add new bullet 7 : Proposals have regard to the West Sussex County Council Minerals and Waste Safeguarding Guidance.	Request by WSCC	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
Appendices				
Appendix A	Plan Area sub-area maps	Maps are dated 2013 and Map A3 shows Parish of Plaistow and Ifold as "Plaistow CP". Current maps to be generated and Plaistow and Ifold correction to be made.	Correction and update.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
Appendix B	Map of designated rural areas	Ifold should be added to Plaistow entry	It is listed under the SI which designates the areas in Chichester: The Housing (Right to Buy) (Designated Rural Areas and Designated Regions) (England) Order 2016 (legislation.gov.uk)	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
Appendix E	Housing Trajectory	Update trajectory to include new permissions, updated phasing		<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
		New appendix to follow current Appendix F - Policies linked to Vision and Objectives – see Appendix to this document for details.		<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>
Appendix F	Monitoring Framework	<p>Insert introduction as follows, amend to form new Chapter 11 and insertion of early review supporting text and new Policy M1: This Appendix shows how the implementation of policies in the Local Plan will be monitored.</p> <p>The purpose of monitoring is to access whether the policies of the Local Plan are achieving the objectives and intended policy outcomes, whether they are having any unintended consequences and whether they require a review.</p> <p>To ensure that the plan continues to be up to date, the plan will be monitored and an early review undertaken if monitoring shows it to be necessary. This review process will enable the findings of the updated transport model and the ongoing 'monitor and manage' process to be</p>	To provide clarity as to the purpose of the MF; introduction in adopted LP has been largely repeated here.	<p>No likely significant effect.</p> <p>The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.</p>

taken into account and whether this results in any consequent changes to key aspects of the plan. Further detail transport monitoring detail is set out in paragraph 8.xx

Policy M1: Review of the Local Plan

An early review of the Local Plan (i.e. before the five-year period expiring) could be triggered by the outcomes of the updated transport modelling or the ongoing transport monitor and manage process. The Transport and Infrastructure Management Group (TIMG) will set the programme for updating the transport model and agree triggers for the early review of the Local Plan, based on the outcomes of the new model and monitor and manage process.

Monitoring proposed by the Sustainability Appraisals to check the predicted effects of the Local Plan policies has informed the monitoring framework.

The Monitoring Framework is set out in relation to the Local Plan chapters with those policies with identified

targets listed together with their relevant monitoring indicators.

The effectiveness of policies is assessed, where possible, against measurable targets. However, some policies aim to deliver a qualitative rather than a quantitative outcome. In such instances, it is appropriate to monitor whether the policy is delivering the intended trend or direction of travel. For some policies, measurable targets may be set through subsequent Development Plan Documents or Supplementary Planning Documents.

The indicators have been selected based on their appropriateness for gauging the effectiveness of the Local Plan policies. The choice of specific indicators is dependent upon the availability of data and in this respect, it is possible these could change over time. The specific indicators used will therefore be reviewed on a regular basis and where the availability of data changes, then some indicators may need to be removed whilst others could potentially be added.

The indicators will be monitored annually through the Authority's Monitoring Report (AMR). The AMR will contain information on the implementation of the Local Plan policies and an assessment of their effectiveness whilst indicating whether any changes need to be considered if a policy is not working or if the targets are not being met. The AMR is published on the Council's website.

Appendix F	Monitoring Framework	Updates to chapter 5 –		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Appendix F	Monitoring Framework – Chapter 4	Delivery column: insert “ Sussex North Water Neutrality Mitigation Strategy ”.	To address objection from Kirdford PC.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Appendix F	Monitoring Framework – Chapter 4	Responsible agency/partner – change: Sussex Wildlife Trust Biodiversity Record Centre .	Correction requested by SWT.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Appendix F	Monitoring Framework – Chapter 8	Add reference to Monitor and Manage process		No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

Appendix F	Monitoring Framework – Chapter 8	Change 'Highways England' to 'National Highways'	Correction	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Appendix F	Monitoring Framework – Chapter 9	Monitoring indicators column – add: "Record of infrastructure projects committed or completed as recorded in the Infrastructure Business Plan (IBP) and Infrastructure Funding Statement (IFS) ".	To address objection from National Highways.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
302	Glossary	Amend the definition of Gypsies and Travellers as follows: 'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently , but excluding members of an organised group of travelling showpeople or circus people travelling together as such. Following an update to DCLG Planning policy for traveller sites (2015), those that have ceased to travel permanently no longer meet the definition for planning purposes.'	To reflect the updated definition contained in 'Planning Policy for Traveller sites' published in December 2023.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Schedule of Policies Map Changes	Chapter 4	Add " Policy NE6 Chichester's Internationally and Nationally Designated Habitats - SAC – Key and Wider Conservation Areas ranges referred to in d) to be added. "	Added to address omission. Reference made in policy to the ranges being shown on policies map.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Schedule of Policies Map Changes	Chapter 4	Change map NE4b East of City Corridors map to reflect adjustment to wildlife corridor around Runcton Horticultural Development Area extension.	Change made to address objections made on E3 as detailed above.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Schedule of Policies Map Changes	Chapter 7	Extension to be changed on Runcton Horticultural Development Area Map E3a. Amended Strategic Wildlife Corridor to be shown on map also.	Change made to address objections made on E3 as detailed above.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.
Schedule of Policies Map Changes	Chapter10 (A14)	Revise map A14a to reflect changes approved in outline planning permission.	To ensure map reflects current approved site boundary.	No likely significant effect. The changes made in this modification do not change the conclusions of original HRA and therefore there will be no impact to European sites.

Modifications to Nutrient Budgets

2.2 As part of this addendum, an updated nutrient budget for the plan area has been provided given the passage of 12 months since the calculation of the budget presented in the HRA report. The following table sets out the latest nutrient budget.

Table 2. Summary of Nutrient Nitrogen Budget for Chichester District for the whole plan period (2021 to 2039)

Site	No of dwellings ultimately discharging wastewater to Chichester Harbour	No of dwellings ultimately discharging and solely wastewater to Chichester Harbour	No of dwellings ultimately discharging solely surface water to Chichester Harbour	Stage 4 – Annual Nutrient Budget	Annual nutrient budget with 20% buffer (kg/N/yr)
Strategic Sites					
Chichester City (Policy A2)	260			202.69	243.23
Southern Gateway (Policy A4) (Bus Station Area)	110			80.46	96.55
Southern Gateway (Policy A5) (Police Field Area)		70		46.39	55.67
West of Chichester (policy A6)			850	-501.57	0
Bosham Highgrove Farm (Policy A11)	300			69.91	83.89
Southbourne (Policy A13)	947			288.29	345.95
Southbourne Gypsy and Traveller Pitches and Travelling Showpeople	24			10.59	12.71
Parish Allocations					
Fishbourne	30			14.14	16.97
Westbourne	18			9.17	11.00
Gypsy Intensification Sites					
Tower Nurseries, Funtington	1			1.89	2.27
Connors/Scant Road East	1			1.89	2.27

Site	No of dwellings ultimately discharging wastewater and surface water to Chichester Harbour	No of dwellings ultimately discharging solely wastewater to Chichester Harbour	No of dwellings ultimately discharging solely surface water to Chichester Harbour	Stage 4 – Annual Nutrient Budget	Annual nutrient budget with 20% buffer (kg/N/yr)
Sunrise, Southbourne	1			1.89	2.27
Greenacre, Cemetery Lane, Westbourne	4			7.57	9.08
	1696	70	850		881.86
Total Nutrient Budget for Anticipated Windfall (general housing)					401.89
Total Nutrient Budget for Anticipated Windfall (gypsy and traveller and travelling showpeople)					187.15
Total					1470.90 Kg/N/Yr

Table 3. Summary of Nutrient Nitrogen Budget for Chichester District for the first five years of plan period (up to 2029)

Site	No of dwellings ultimately discharging wastewater and surface water to Chichester Harbour	No of dwellings ultimately discharging solely wastewater to Chichester Harbour	No of dwellings ultimately discharging solely surface water to Chichester Harbour	Stage 4 – Annual Nutrient Budget	Annual nutrient budget with 20% buffer (kg/N/yr)
Strategic Sites					
West of Chichester (policy A6)			386 (45%)	-225.75	0
Bosham Highgrove Farm (Policy A11)	175 (58%)			40.55	48.66
Gypsy Intensification Sites					
Tower View Nurseries, Funtington	1			1.89	2.27
Connors/Scant Road East	1			1.89	2.27
Sunrise, Southbourne	1			1.89	2.27

Site	No of dwellings ultimately discharging wastewater and surface water to Chichester Harbour	No of dwellings ultimately discharging wastewater to Chichester Harbour	No of dwellings ultimately discharging solely to surface water to Chichester Harbour	Stage 4 – Annual Nutrient Budget	Annual nutrient budget with 20% buffer (kg/N/yr)
Greenacre, Cemetery Lane, Westbourne	4			7.57	9.08
	182		768		64.55
Total Nutrient Budget for Anticipated Windfall (general housing)					64.27
Total Nutrient Budget for Anticipated Windfall (gypsy and traveller and travelling showpeople)					121.66
Total					250.48 Kg/N/Yr

- 2.3 Overall, the whole plan period nutrient budget has reduced from the previous calculations. This is typical of nutrient budgets where they are updated throughout the plan period and is due to the fluid nature of numbers of dwellings changing within potential allocations and through completion of sites.
- 2.4 The five-year period (2024-2029) total budget however is approximately 20kg/n/yr higher than previous five-year period (2021-2026) total budget.
- 2.5 The previous HRA stated “*While mitigation to offset the identified 230.81 kgN/ha/yr does not need to be secured at this stage (provided it is identified before the relevant sites are consented for development) there does need to be adequate confidence that sufficient mitigation is likely to be available. As an example, to offset 230.81 kgN/yr approximately 11 additional hectares of arable land would need to be removed from production and rewilded. Sufficient offsetting for the first five years of the Local Plan period should be achievable without particular difficulty. The West of Chichester and Westhampnett sites do not require mitigation for the purposes of the overall budget. However, the fourth column shows that both of these sites do hold some 345.92 kgN/yr as surplus mitigation. Planning applications are currently using sites at Chilgrove Farm and another at East Dean for mitigation purposes. Both of these have overarching legal agreements in place to manage the sale of credits. Other applications have identified their own smaller mitigation schemes. Additional strategic mitigation sites are in the process of coming forward, subject to planning permission, and there is also the wider Natural England Mitigation Scheme which could provide mitigation as required in the future.*”
- 2.6 The updated nutrient budget is not significantly larger than the previous one and would require only approximately 1 hectare of additional arable land to be removed from production and rewilded, which does not change the conclusion that sufficient offsetting should be achievable without particular difficulty. Additionally, the West of Chichester policy does not require mitigation for the purposes of the overall budget and shows that the site still holds some 255.75 kg/N/yr as surplus mitigation.
- 2.7 Additionally, the policies within the Local Plan have not changed and still specifically prevent the acceptance of development without the developer having provided evidence of nutrient neutrality in perpetuity as well as the council working with the Partnership for South Hampshire and other partners to identify potential mitigation schemes to be utilised for the development within the Local Plan area. Therefore, the conclusions of the previous HRA have not changed and can still be concluded that there will be no adverse effects of the plan on the integrity of the Chichester and Langstone Harbours SPA and Ramsar site and the Solent maritime SAC.

Conclusion

- 2.8 Following the analysis of the proposed modifications to the Local Plan it can be concluded that they will not lead to a likely significant effect on European sites, alone or in combination with other plans and projects, and do not undermine the conclusions of the HRA of the Local Plan.

3. Updated air quality assessment

- 3.1 Stantec was commissioned by Chichester District Council (CDC) to provide support to understand the potential impact on Air Quality (at both human and ecological receptors) of future housing and employment growth and the resultant changes in traffic flows on the highway network associated with the Local Plan (LP). The outputs from the assessment were reported in 2022¹⁰ as part of the evidence base to support the preparation of the LP.
- 3.2 Following preparation of the Air Quality assessment, and representations submitted by Natural England in relation to the Habitats Regulations Assessment of the proposed submission LP in 2023, discussions with Natural England have identified potential risks associated with in-combination effects at two ecological receptors, the Mens SAC and the Duncton to Bignor Escarpment SAC.
- 3.3 Following a review of the predicted air quality impacts by the Project Ecologist (AECOM) it is considered that the assessment of likely significant effects would benefit from greater understanding of the traffic flows on key roads in proximity to the SACs and of potential changes to emission of NO_x and NH₃ from road traffic over the local plan period which extends to 2039.
- 3.4 Therefore, to further inform the HRA, the following options have been investigated:
- Application of alternative traffic data from Horsham District Council (HDC) traffic model, as it is considered to have better validation in rural areas such as the A272 in proximity to The Mens SAC; and
 - Application of more realistic emissions factors for NO_x and NH₃ to reflect potential future changes in vehicle types as the original assessment had used worst-case emission factors for 2030 with 2039 traffic flows.
- 3.5 The results of the updated modelling are presented in the technical note in Appendix A. The forecast 'in combination' increase in ammonia lies well within the likely annual variation in ammonia concentrations. However, due to concerns over ammonia at The Mens SAC it is concluded that the most appropriate approach to dealing with the forecast increase in ammonia concentrations is to introduce a programme of measures to encourage a further shift from petrol cars and vans¹¹ to ultra-low emission vehicles (ULEVs) over the period to 2039, beyond that modelled to arise purely from implementation of national policies.
- 3.6 Automated Number Plate Recognition (ANPR) data for the A272 collected for Horsham District Council indicates that the local area already has a greater proportion of electric vehicles than the average fleet. This suggests that local existing and future car and van owners would be more responsive to a package of such measures than the average motorist. It is not possible to predict how much future ammonia concentrations would be reduced by such measures, since it would be dependent on uptake. However, it is possible to identify what further percentage conversion of petrol cars and vans to ULEVs would be required in order to reduce the 'in combination' ammonia impact to 1% of the critical level.
- 3.7 Since the impact is not forecast to occur until late in the plan period, this could be used as a performance target in future Local Plan Reviews to confirm whether the measures were on target to achieve their objective, and if not either introduce further measures or, potentially, amend Local Plan growth in the north of the plan area.
- 3.8 It is considered that given the forecast 'in combination' increase in ammonia lies well within the likely annual variation in ammonia concentrations, and with the measures outlined above, a framework would be in place

¹⁰ Stantec (2022) 'Chichester Local Plan Review Air Quality Assessment'

¹¹ As these are a major source of vehicular ammonia.

to ensure no adverse effect on the integrity of the SAC arose alone or 'in combination' with other plans or projects.

Appendix A Air Quality Technical Note

TECHNICAL NOTE

Job Name: Chichester Local Plan Update
Job No: 330610057.5548
Note No: 002
Date: April 2024
Prepared by: Chris Brownlie (Stantec Air Quality), Dr James Riley (AECOM Ecology)
Reviewed by: Philip Branchflower (Stantec)
Subject: **Revised Air Quality Modelling to inform HRA for The Mens SAC and Duncton to Bignor Escarpment SAC**

1. Introduction

- 1.1. Stantec has been commissioned by Chichester District Council (CDC) to provide support to understand the potential impact on Air Quality (at both human and ecological receptors) of future housing and employment growth and the resultant changes in traffic flows on the highway network associated with the new Local Plan 2021 – 2039 (LP). The outputs from the assessment were reported in 2022¹ as part of the evidence base to support the preparation of the LP.
- 1.2. Following preparation of the Air Quality assessment, discussions with Natural England have identified potential risks associated with in-combination effects at two ecological receptors, the Mens SAC and the Duncton to Bignor Escarpment SAC.
- 1.3. Following a review of the predicted air quality impacts by the Project Ecologist (AECOM) it is considered that the assessment of likely significant effects would benefit from greater understanding of the traffic flows on key roads in proximity to the SACs and of potential changes to emission of NO_x and NH₃ from road traffic over the local plan period which extends to 2039.
- 1.4. Therefore, to further inform the HRA, the following options have been investigated:
 - Application of alternative traffic data from Horsham District Council (HDC) traffic model, as it is considered to have better validation in rural areas such as the A272 in proximity to The Mens SAC; and
 - Application of more realistic emissions factors for NO_x and NH₃ to reflect potential future changes in vehicle types as the original assessment had used worst-case emission factors for 2030 with 2039 traffic flows.
- 1.5. The results of the updated modelling are presented in this technical note.

2. Methodology

- 2.1. The applied methodology for quantifying the emissions and resultant impacts at the identified receptors (including meteorological data, model verification etc) remain essentially the same as applied for the main Air Quality assessment (and has therefore not been repeated here) with the following changes to reflect the specific HRA requirements.

¹ Stantec (2022) 'Chichester Local Plan Review Air Quality Assessment'

TECHNICAL NOTE

2.2. Updated traffic flows have been provided for the A272 in the vicinity of the Mens SAC (obtained from the Horsham Transport Model) and the A285 in the vicinity of the Duncton to Bignor Escarpment SAC (from the Chichester Area Transport Model). The trip generation figures are associated with the proposed levels of development in the north of the plan area as per the Local Plan submission and are shown in Table 1. The models are AM and PM peak hour only and Annual Average Daily Traffic (AADT) figures have been calculated using factors derived from local automatic traffic count sites, obtained from West Sussex County Council. Percentage Heavy Delivery Vehicle (HDV) and link speeds have also been derived from the traffic models. Details of the traffic data utilised are presented in Annex A.

Table 1 Development Quanta for Local Plan Sites in North of Chichester District

Development Location				Total
Kirdford	Loxwood	Plaistow & Ifold	Wisborough Green	
50	220	25	75	370

- 2.3. To quantify the potential impact of air pollutants from traffic on ecological receptors, in the original assessment the Emission Factor Toolkit (EFT) (v11) with a 2030 emission year for the LP growth scenario (2039) was used to quantify NOx emissions. Emissions of ammonia (NH₃) were calculated using the Calculator for Road Emissions of Ammonia (CREAM) tool², again with a 2030 emission year for the LPR scenarios (2039).
- 2.4. The precautionary selection of a 2030 emission year in the EFT was due to uncertainty as to the timescales of fleet renewal, in particular the uptake of fully electric vehicles which result in zero tailpipe emissions of both NOx and NH₃; therefore overestimation of the uptake rate of EV would compromise the robustness of the assessment. However, using 2030 emission factors for 2039 ignores the electrification of the vehicle fleet which will arise during the 2030s.
- 2.5. Moreover, the EFTv11 was released in November 2021 with projected fleet composition based on 2019 data; there have been a wide range of factors which will have influenced the rate of renewal of the vehicle fleet (political, societal, and economic) in the intervening years.
- 2.6. The updated EFTv12.0.1 includes updated projection of fleet composition (and indeed emission factors for specific vehicle types) based on more recent data including DfT projections on future new vehicle sales in December 2021. There are still a range of factors that could influence these projections (in particular the delay to the ban on the sale of new petrol and diesel cars from 2030 to 2035) and therefore application of post-2030 emission factors require appropriate consideration of such uncertainty.
- 2.7. To inform the HRA and provide a more realistic future scenario, the EFT (v12.0.1) and CREAM tools have been applied with the assumption that 50% of cars and LGVs are ultra-low emission vehicles (i.e. 100% electric). This draws upon transport projections out to 2050 of the UK’s intended decarbonisation of the fleet and alignment with Net Zero as available from the DfT’s Transport Decarbonisation Plan (DfT, 2022) and broadly aligns with the lower ambition “Decarbonising Transport Upper” projection. It may still be precautionary given government aspirations for electrification of the vehicle fleet to 2039. To calculate the emissions the detailed split option 3 within the EFT and CREAM tool have been used with the updated EFTv12.0.1 fleet composition for 2039 applied.
- 2.8. Further discussion of the applied emission projections is presented in **Annex C**

² Air Quality Consultants (2020) ‘Calculator for Road Emissions of Ammonia (CREAM) v1A.’ Available at: <https://www.aqconsultants.co.uk/resources>

TECHNICAL NOTE

2.9. The modelled receptors and their relevant critical levels/loads and baseline levels/loads have been updated from the Air Pollution Information System (APIS) as summarised in **Table 2** and **Table 3**.

Table 2 Identified Ecological Receptor's (Habitat Regulation Sites) relevant critical levels/loads

Habitat Regulations Site	Receptors	Applied Critical Levels/ Load				
		NO _x Annual (µg/m ³)	NO _x 24 hour (µg/m ³)	NH ₃ annual (µg/m ³)	Nitrogen Deposition (kgN/ha/yr)	Acid Deposition (keq/ha/yr)
Duncton to Bignor Escarpment SAC	DNBG1 to 14	30	75	1	10	2.14
The Mens SAC	MENS1_1 to MENS1_14	30	75	1	10	3.2
	MENS2_1 to MENS2_14					

2.10. The three-year average (2019-2021) nitrogen and acid deposition rates as well as annual mean NH₃ have been taken from APIS and are presented in **Table 3**.

Table 3 Baseline Deposition Rates and Concentrations

Habitat Regulations Site	Receptors	Baseline Deposition Rates and Concentrations				
		NO _x Annual (µg/m ³)	NH ₃ annual (µg/m ³)	Total Nitrogen Deposition (kgN/ha/yr)	Acid Deposition	
					Nitrogen (keqN/ha/yr)	Sulphur (keqS/ha/yr)
Duncton to Bignor Escarpment SAC	DNBG1 to 14	8.6	1.12	13.84	0.99	0.14
The Mens SAC	MENS1_1 to MENS1_14	9.3	1.51	22.14	1.58	0.16
	MENS2_1 to MENS2_14					

2.11. The following updated scenarios have been investigated:

- 2019 Baseline
- 2039 Do Nothing (DN) – a theoretical future baseline with no traffic growth between the baseline and 2039, but with anticipated reduction in emissions from traffic due to future changes in vehicle type and background concentrations (2030 backgrounds).
- 2039 Do Minimum (DM) – the ‘Reference Case’ traffic model scenario excluding potential Local Plan growth, but includes committed developments and anticipated future reductions in emissions from traffic due to future changes in vehicle type and background concentrations (2030 backgrounds); and
- 2039 Do Something (DS) – the ‘Local Plan Scenario’ includes forecast growth on the local network with mitigation and with anticipated future reductions in emissions from traffic due to future changes in vehicle type and background concentrations (2030 backgrounds).

2.12. The results for the Do-Minimum and Do-Something scenarios have been compared to show the impacts of the LP growth scenario ‘in isolation’. The results of the Do-Nothing and Do-Something scenarios have been compared to identify the potential ‘in-combination’ impacts associated with the growth scenario, other projects and plans.

TECHNICAL NOTE

3. Updated Results and Impacts

- 3.1. Full results of the updated ecological receptors (including the updated impacts) for each scenario are presented in **Annex B** (more reasonable worst-case scenario).
- 3.2. The predicted NO_x impacts largely reflect the decrease in NO_x emissions due to the continued phasing out of older vehicles (particularly diesel) despite increased traffic flows.
- 3.3. The predicted NH₃ impacts largely reflect the increase in NH₃ emissions resulting from the increased proportion of the petrol cars and this is amplified by increased traffic flows and mitigated by increased fleet electrification.
- 3.4. The resultant nitrogen deposition is a combination of the decrease in NO_x emissions, variation in traffic flows (base and LP scenarios) and increased NH₃ emissions.
- 3.5. Further analysis of these results will be provided by an ecologist to inform the assessment of the Likely Significant Effect (LSE) and any required Habitat Regulation Assessment (HRA) of the LP growth scenario. This is presented beneath each table in Annex B.

TECHNICAL NOTE

Annex A Traffic Data

A272 MENS Nature Reserve

(All flows in Vehicles)

Direction	AM				PM				AADT		
	Base Lights	Base HDV	HDV%	Modelled Speed (kph)	Base Lights	Base HDV	HDV%	Modelled Speed (kph)	Base - Total	HDV	HDV %
SB	110	17	13.4%	82	263	0	0.2%	81	2539	113	4%
NB	263	7	2.7%	81	195	0	0.0%	81	2842	45	2%
2 Way Flow	373	24	6.1%		458	0	0.1%		5381	158	3%

Direction	AM								PM								AADT - Lights				AADT - HDVs				AADT - Total Vehs			
	Ref Lights	Ref HDV	HDV%	Modelled Speed (kph)	LP Lights	LP HDV	HDV%	Modelled Speed (kph)	Ref Lights	Ref HDV	HDV%	Modelled Speed (kph)	LP Lights	LP HDV	HDV%	Modelled Speed (kph)	Ref Lights	LP Lights	Lights% - Ref	Lights % - LP	HDV - Ref	HDV - LP	HDV% - Ref	HDV% - LP	Total - Ref	Total - LP	Diff	% Diff
SB	142	21	12.9%	82	160	21	11.6%	82	364	1	0.3%	81	400	1	0.2%	81	3292	3643	95.8%	96.2%	143	143	4.2%	3.8%	3435	3786	351	10.2%
NB	362	3	0.8%	81	369	3	0.8%	81	355	0	0.0%	81	355	0	0.0%	81	4378	4710	99.6%	99.6%	18	20	0.4%	0.4%	4396	4729	333	7.6%
2 Way Flow	504	24	4.5%		529	24	4.3%		719	1	0.1%		755	1	0.1%		7670	8352	97.9%	98.1%	161	163	2.1%	1.9%	7831	8515	684	8.7%

Source: Horsham Transport Model

TECHNICAL NOTE

A285 Duncton

(All flows in Vehicles)

Direction	AM				PM				AADT		
	Base Lights	Base HDV	HDV%	Modelled Speed (kph)	Base Lights	Base HDV	HDV%	Modelled Speed (kph)	Base - Total	HDV	HDV %
SB	171	4	2.2%	73	256	4	1.7%	72	2831	54	2%
NB	189	9	4.6%	73	287	3	0.9%	72	2978	72	2%
2 Way Flow	360	13	3.5%		543	7	1.3%		5810	125	2%

Direction	AM								PM								AADT - Lights				AADT - HDVs				AADT - Total Vehs			
	Ref Lights	Ref HDV	HDV%	Modelled Speed (kph)	LP Lights	LP HDV	HDV%	Modelled Speed (kph)	Ref Lights	Ref HDV	HDV%	Modelled Speed (kph)	LP Lights	LP HDV	HDV%	Modelled Speed (kph)	Ref Lights	LP Lights	Lights% - Ref	Lights % - LP	HDV - Ref	HDV - LP	HDV% - Ref	HDV% - LP	Total - Ref	Total - LP	Diff	% Diff
SB	707	17	2.3%	65	730	16	2.1%	64	541	10	1.8%	69	546	12	2.1%	69	7376	7541	97.9%	97.9%	160	164	2.1%	2.1%	7535	7705	170	2.3%
NB	390	28	6.7%	71	423	28	6.2%	70	491	4	0.8%	70	512	5.2	1.0%	70	5767	6121	96.5%	96.6%	209	217	3.5%	3.4%	5977	6338	361	6.0%
2 Way Flow	1097	45	3.9%		1153	44	3.7%		1032	14	1.3%		1058	17	1.6%		13143	13662	97.3%	97.3%	369	381	2.7%	2.7%	13512	14044	531	3.9%

Source: Chichester Area Transport Model

TECHNICAL NOTE

Link	Original Traffic Data		Original emissions (EFTv11 2030 based)		Revised Traffic Data		EFTv12 2034 based Emissions		EFTv12 50% ZEV based Emissions	
	AADT	%HDV	NO _x (g/km/s)	NH ₃ (g/km/s)	AADT	%HDV	NO _x (g/km/s)	NH ₃ (g/km/s)	NO _x (g/km/s)	NH ₃ (g/km/s)
Base										
A285 Duncton	6418	1.63	0.02297	0.00166	5810	2.16	0.02267	0.00181	0.02267	0.00181
A272 Mens Nature Reserve	2564	2.62	0.00935	0.00069	5381	2.94	0.02147	0.00168	0.02147	0.00168
Do Nothing										
A285 Duncton	6418	1.63	0.00733	0.00207	5810	2.16	0.00362	0.00205	0.00152	0.00109
A272 Mens Nature Reserve	2564	2.62	0.00299	0.00085	5381	2.94	0.00343	0.00190	0.00150	0.00101
Reference Case										
A285 Duncton	12613	2.94	0.01453	0.00421	13512	2.73	0.00851	0.00469	0.00366	0.00254
A272 Mens Nature Reserve	5974	3.28	0.00699	0.00201	7831	2.08	0.00489	0.00272	0.00208	0.00147
Mitigated										
A285 Duncton	13460	2.95	0.01552	0.00450	14044	2.72	0.00884	0.00488	0.00380	0.00264
A272 Mens Nature Reserve	6347	2.91	0.00741	0.00212	8515	1.91	0.00530	0.00296	0.00223	0.00160

TECHNICAL NOTE

Annex B Revised Model Results

Table B-1: Realistic Scenario - Predicted 'in-isolation' Annual Mean NOx at Modelled Ecological Receptors

Figures up to 10m from the roadside are greyed out as closer to the roadside edge effects dominate and roadside air turbulence makes model results less reliable. This has been agreed with Natural England. In the 'percentage of critical level' columns, yellow indicates no exceedance of '1% of critical level threshold' using IAQM guidance, which advises not using the criterion to more than one significant figure (1%). Green indicates no exceedance of '1% of critical level threshold' used strictly (1.0%). Green in the 'future year DS' column indicates that no exceedance of the critical level is expected in 2039 even with growth.

Receptor	Critical Level	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Level	Base Year	Future Year DM	Future year DS
DNBG1 (0m)	30	0.1	0.2%	17.3	9.3	9.4
DNBG2 (2m)	30	0.1	0.2%	16.7	9.2	9.3
DNBG3 (5m)	30	<0.1	0.2%	16.0	9.1	9.1
DNBG4 (10m)	30	<0.1	0.1%	15.1	8.9	9.0
DNBG5 (15m)	30	<0.1	0.1%	14.3	8.8	8.8
DNBG6 (20m)	30	<0.1	0.1%	13.7	8.7	8.7
DNBG7 (25m)	30	<0.1	0.1%	13.3	8.6	8.7
DNBG8 (50m)	30	<0.1	0.1%	11.7	8.4	8.4
DNBG9 (75m)	30	<0.1	0.0%	10.9	8.3	8.3
DNBG10 (100m)	30	<0.1	0.0%	10.4	8.2	8.2
DNBG11 (125m)	30	<0.1	0.0%	10.1	8.1	8.1
DNBG12 (150m)	30	<0.1	0.0%	9.9	8.1	8.1
DNBG13 (175m)	30	<0.1	0.0%	9.7	8.1	8.1
DNBG14 (200m)	30	<0.1	0.0%	9.6	8.0	8.1
MENS1_1 (0m)	30	0.1	0.2%	18.6	7.6	7.6
MENS1_2 (2m)	30	0.1	0.2%	18.6	7.5	7.5
MENS1_3 (5m)	30	0.1	0.2%	17.6	7.4	7.4
MENS1_4 (10m)	30	0.1	0.2%	16.3	7.3	7.3
MENS1_5 (15m)	30	<0.1	0.1%	15.4	7.2	7.2
MENS1_6 (20m)	30	<0.1	0.1%	14.7	7.1	7.1
MENS1_7 (25m)	30	<0.1	0.1%	14.1	7.0	7.1
MENS1_8 (50m)	30	<0.1	0.1%	12.4	6.9	6.9

TECHNICAL NOTE

Receptor	Critical Level	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Level	Base Year	Future Year DM	Future year DS
MENS1_9 (75m)	30	<0.1	0.1%	11.6	6.8	6.8
MENS1_10 (100m)	30	<0.1	0.0%	11.1	6.8	6.8
MENS1_11 (125m)	30	<0.1	0.0%	10.8	6.7	6.7
MENS1_12 (150m)	30	<0.1	0.0%	10.6	6.7	6.7
MENS1_13 (175m)	30	<0.1	0.0%	10.4	6.7	6.7
MENS1_14 (200m)	30	<0.1	0.0%	10.3	6.7	6.7
MENS2_1 (0m)	30	0.1	0.2%	19.1	7.5	7.6
MENS2_2 (2m)	30	0.1	0.2%	18.2	7.4	7.5
MENS2_3 (5m)	30	0.1	0.2%	17.2	7.3	7.4
MENS2_4 (10m)	30	<0.1	0.2%	15.9	7.2	7.3
MENS2_5 (15m)	30	<0.1	0.1%	15.0	7.1	7.2
MENS2_6 (20m)	30	<0.1	0.1%	14.3	7.1	7.1
MENS2_7 (25m)	30	<0.1	0.1%	13.7	7.0	7.0
MENS2_8 (50m)	30	<0.1	0.1%	12.1	6.8	6.9
MENS2_9 (75m)	30	<0.1	0.0%	11.3	6.8	6.8
MENS2_10 (100m)	30	<0.1	0.0%	10.8	6.7	6.7
MENS2_11 (125m)	30	<0.1	0.0%	10.5	6.7	6.7
MENS2_12 (150m)	30	<0.1	0.0%	10.3	6.7	6.7
MENS2_13 (175m)	30	<0.1	0.0%	10.2	6.7	6.7
MENS2_14 (200m)	30	<0.1	0.0%	10.1	6.6	6.7

Ecological interpretation

The '1% of the critical level screening threshold is not exceeded by the Local Plan alone. Therefore, no adverse effect on integrity will result from Chichester Local Plan alone. However, effects 'in combination' also need consideration. This is presented in Table B-2.

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Table B-2: Realistic Scenario Predicted 'in-combination' annual mean NOx at Modelled Ecological Receptors

Figures up to 10m from the roadside are greyed out as closer to the roadside edge effects dominate and roadside air turbulence makes model results less reliable. This has been agreed with Natural England. In the 'percentage of critical level' columns, amber indicates exceedance of the '1% of the critical level' threshold. yellow indicates no exceedance of '1% of critical level threshold' using IAQM guidance, which advises not using the criterion to more than one significant figure (1%). Green indicates no exceedance of '1% of critical level threshold' used strictly (1.0%). Green in the 'future year DS' column indicates that no exceedance of the critical level is expected in 2039 even with growth.

Receptor	Critical Level	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Level	Base Year	Future Year DN	Future year DS
DNBG1 (0m)	30	0.9	2.9%	17.3	8.5	9.4
DNBG2 (2m)	30	0.8	2.7%	16.7	8.4	9.3
DNBG3 (5m)	30	0.7	2.5%	16.0	8.4	9.1
DNBG4 (10m)	30	0.6	2.1%	15.1	8.3	9.0
DNBG5 (15m)	30	0.6	1.9%	14.3	8.3	8.8
DNBG6 (20m)	30	0.5	1.7%	13.7	8.2	8.7
DNBG7 (25m)	30	0.5	1.6%	13.3	8.2	8.7
DNBG8 (50m)	30	0.3	1.0%	11.7	8.1	8.4
DNBG9 (75m)	30	0.2	0.8%	10.9	8.0	8.3
DNBG10 (100m)	30	0.2	0.6%	10.4	8.0	8.2
DNBG11 (125m)	30	0.1	0.5%	10.1	8.0	8.1
DNBG12 (150m)	30	0.1	0.4%	9.9	8.0	8.1
DNBG13 (175m)	30	0.1	0.4%	9.7	8.0	8.1
DNBG14 (200m)	30	0.1	0.3%	9.6	8.0	8.1
MENS1_1 (0m)	30	0.3	1.1%	18.6	7.3	7.6
MENS1_2 (2m)	30	0.3	1.0%	18.6	7.2	7.5
MENS1_3 (5m)	30	0.3	0.9%	17.6	7.2	7.4
MENS1_4 (10m)	30	0.2	0.8%	16.3	7.1	7.3
MENS1_5 (15m)	30	0.2	0.7%	15.4	7.0	7.2
MENS1_6 (20m)	30	0.2	0.6%	14.7	7.0	7.1
MENS1_7 (25m)	30	0.2	0.5%	14.1	6.9	7.1
MENS1_8 (50m)	30	0.1	0.4%	12.4	6.8	6.9
MENS1_9 (75m)	30	0.1	0.3%	11.6	6.7	6.8

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Receptor	Critical Level	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Level	Base Year	Future Year DN	Future year DS
MENS1_10 (100m)	30	0.1	0.2%	11.1	6.7	6.8
MENS1_11 (125m)	30	0.1	0.2%	10.8	6.7	6.7
MENS1_12 (150m)	30	<0.1	0.1%	10.6	6.7	6.7
MENS1_13 (175m)	30	<0.1	0.1%	10.4	6.7	6.7
MENS1_14 (200m)	30	<0.1	0.1%	10.3	6.6	6.7
MENS2_1 (0m)	30	0.3	1.1%	19.1	7.3	7.6
MENS2_2 (2m)	30	0.3	1.0%	18.2	7.2	7.5
MENS2_3 (5m)	30	0.3	0.9%	17.2	7.1	7.4
MENS2_4 (10m)	30	0.2	0.8%	15.9	7.0	7.3
MENS2_5 (15m)	30	0.2	0.6%	15.0	7.0	7.2
MENS2_6 (20m)	30	0.2	0.6%	14.3	6.9	7.1
MENS2_7 (25m)	30	0.2	0.5%	13.7	6.9	7.0
MENS2_8 (50m)	30	0.1	0.3%	12.1	6.8	6.9
MENS2_9 (75m)	30	0.1	0.2%	11.3	6.7	6.8
MENS2_10 (100m)	30	0.1	0.2%	10.8	6.7	6.7
MENS2_11 (125m)	30	<0.1	0.1%	10.5	6.7	6.7
MENS2_12 (150m)	30	<0.1	0.1%	10.3	6.6	6.7
MENS2_13 (175m)	30	<0.1	0.1%	10.2	6.6	6.7
MENS2_14 (200m)	30	<0.1	0.1%	10.1	6.6	6.7

Ecological interpretation

While the '1% of the critical level screening threshold is exceeded 'in combination' on the Duncton to Bignor Escarpment SAC transect, up to 25m from the roadside, the total forecast NOx concentrations are not forecast to exceed the critical level of 30 $\mu\text{g}\text{m}^{-3}$ in 2039. **Therefore, no adverse effect on integrity will arise from NOx in atmosphere.**

TECHNICAL NOTE

Table B-3 Realistic Scenario Predicted 'in isolation' Annual NH₃ at Modelled Ecological Receptors

Figures up to 10m from the roadside are greyed out as closer to the roadside edge effects dominate and roadside air turbulence makes model results less reliable. This has been agreed with Natural England. In the 'percentage of critical level' columns, green indicates no exceedance of '1% of critical level threshold'. Amber in the 'future year DS' column indicates that exceedance of the critical level is expected in 2039.

Receptor	Critical Level	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Level	Base Year	Future Year DM	Future year DS
DNBG1 (0m)	1	<0.1	1.2%	1.3	1.4	1.4
DNBG2 (2m)	1	<0.1	1.1%	1.3	1.4	1.4
DNBG3 (5m)	1	<0.1	1.0%	1.3	1.4	1.4
DNBG4 (10m)	1	<0.1	0.9%	1.3	1.4	1.4
DNBG5 (15m)	1	<0.1	0.8%	1.3	1.3	1.3
DNBG6 (20m)	1	<0.1	0.7%	1.3	1.3	1.3
DNBG7 (25m)	1	<0.1	0.7%	1.2	1.3	1.3
DNBG8 (50m)	1	<0.1	0.4%	1.2	1.2	1.2
DNBG9 (75m)	1	<0.1	0.3%	1.2	1.2	1.2
DNBG10 (100m)	1	<0.1	0.3%	1.2	1.2	1.2
DNBG11 (125m)	1	<0.1	0.2%	1.2	1.2	1.2
DNBG12 (150m)	1	<0.1	0.2%	1.2	1.2	1.2
DNBG13 (175m)	1	<0.1	0.2%	1.1	1.2	1.2
DNBG14 (200m)	1	<0.1	0.1%	1.1	1.2	1.2
MENS1_1 (0m)	1	<0.1	1.9%	1.8	1.7	1.8
MENS1_2 (2m)	1	<0.1	1.8%	1.7	1.7	1.7
MENS1_3 (5m)	1	<0.1	1.6%	1.7	1.7	1.7
MENS1_4 (10m)	1	<0.1	1.3%	1.7	1.7	1.7
MENS1_5 (15m)	1	<0.1	1.2%	1.7	1.6	1.7
MENS1_6 (20m)	1	<0.1	1.0%	1.6	1.6	1.6
MENS1_7 (25m)	1	<0.1	0.9%	1.6	1.6	1.6
MENS1_8 (50m)	1	<0.1	0.6%	1.6	1.6	1.6
MENS1_9 (75m)	1	<0.1	0.4%	1.6	1.6	1.6
MENS1_10 (100m)	1	<0.1	0.3%	1.6	1.5	1.6

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Receptor	Critical Level	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Level	Base Year	Future Year DM	Future year DS
MENS1_11 (125m)	1	<0.1	0.3%	1.5	1.5	1.5
MENS1_12 (150m)	1	<0.1	0.2%	1.5	1.5	1.5
MENS1_13 (175m)	1	<0.1	0.2%	1.5	1.5	1.5
MENS1_14 (200m)	1	<0.1	0.2%	1.5	1.5	1.5
MENS2_1 (0m)	1	<0.1	1.9%	1.8	1.7	1.7
MENS2_2 (2m)	1	<0.1	1.7%	1.7	1.7	1.7
MENS2_3 (5m)	1	<0.1	1.5%	1.7	1.7	1.7
MENS2_4 (10m)	1	<0.1	1.3%	1.7	1.7	1.7
MENS2_5 (15m)	1	<0.1	1.1%	1.7	1.6	1.6
MENS2_6 (20m)	1	<0.1	1.0%	1.6	1.6	1.6
MENS2_7 (25m)	1	<0.1	0.9%	1.6	1.6	1.6
MENS2_8 (50m)	1	<0.1	0.5%	1.6	1.6	1.6
MENS2_9 (75m)	1	<0.1	0.4%	1.6	1.6	1.6
MENS2_10 (100m)	1	<0.1	0.3%	1.5	1.5	1.5
MENS2_11 (125m)	1	<0.1	0.2%	1.5	1.5	1.5
MENS2_12 (150m)	1	<0.1	0.2%	1.5	1.5	1.5
MENS2_13 (175m)	1	<0.1	0.2%	1.5	1.5	1.5
MENS2_14 (200m)	1	<0.1	0.1%	1.5	1.5	1.5

Ecological interpretation

The '1% of the critical level screening threshold is not exceeded by Chichester Local Plan alone. Therefore no adverse effects on integrity are expected from the Local Plan alone. However, the critical level itself ($1\mu\text{g}\text{m}^{-3}$) is exceeded. This is largely due to existing ammonia concentrations but it means 'in combination' effects need consideration. These are in Table B-4.

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Table B-4: Realistic Scenario Predicted 'in combination' Annual NH₃ at Modelled Ecological Receptors

Figures for 10m from the roadside are greyed out as closer to the roadside edge effects dominate and roadside air turbulence makes model results less reliable. This has been agreed with Natural England. In the 'percentage of critical level' columns, yellow indicates no exceedance of '1% of critical level threshold' using IAQM guidance, which advises not using the criterion to more than one significant figure (1%). Green indicates no exceedance of '1% of critical level threshold' used strictly (1.0%), amber means exceedance of the '1% of the critical level' threshold. Amber in the 'future year DS' column indicates that exceedance of the critical level is expected in 2039.

Receptor	Critical Level	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Level	Base Year	Future Year DN	Future year DS
DNBG1 (0m)	1	0.2	19.1%	1.3	1.3	1.4
DNBG2 (2m)	1	0.2	17.8%	1.3	1.2	1.4
DNBG3 (5m)	1	0.2	16.2%	1.3	1.2	1.4
DNBG4 (10m)	1	0.1	14.1%	1.3	1.2	1.4
DNBG5 (15m)	1	0.1	12.5%	1.3	1.2	1.3
DNBG6 (20m)	1	0.1	11.2%	1.3	1.2	1.3
DNBG7 (25m)	1	0.1	10.2%	1.2	1.2	1.2
DNBG8 (50m)	1	0.1	6.8%	1.2	1.2	1.2
DNBG9 (75m)	1	0.1	5.0%	1.2	1.2	1.2
DNBG10 (100m)	1	<0.1	3.9%	1.2	1.1	1.2
DNBG11 (125m)	1	<0.1	3.2%	1.2	1.1	1.2
DNBG12 (150m)	1	<0.1	2.7%	1.2	1.1	1.2
DNBG13 (175m)	1	<0.1	2.4%	1.1	1.1	1.2
DNBG14 (200m)	1	<0.1	2.1%	1.1	1.1	1.2
MENS1_1 (0m)	1	0.1	8.9%	1.8	1.7	1.8
MENS1_2 (2m)	1	0.1	8.2%	1.7	1.7	1.7
MENS1_3 (5m)	1	0.1	7.3%	1.7	1.6	1.7
MENS1_4 (10m)	1	0.1	6.2%	1.7	1.6	1.7
MENS1_5 (15m)	1	0.1	5.4%	1.7	1.6	1.7
MENS1_6 (20m)	1	<0.1	4.7%	1.6	1.6	1.6
MENS1_7 (25m)	1	<0.1	4.2%	1.6	1.6	1.6
MENS1_8 (50m)	1	<0.1	2.8%	1.6	1.6	1.6
MENS1_9 (75m)	1	<0.1	2.0%	1.6	1.5	1.6

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Receptor	Critical Level	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Level	Base Year	Future Year DN	Future year DS
MENS1_10 (100m)	1	<0.1	1.6%	1.6	1.5	1.6
MENS1_11 (125m)	1	<0.1	1.3%	1.5	1.5	1.5
MENS1_12 (150m)	1	<0.1	1.1%	1.5	1.5	1.5
MENS1_13 (175m)	1	<0.1	1.0%	1.5	1.5	1.5
MENS1_14 (200m)	1	<0.1	0.8%	1.5	1.5	1.5
MENS2_1 (0m)	1	0.1	8.6%	1.8	1.7	1.7
MENS2_2 (2m)	1	0.1	7.9%	1.7	1.6	1.7
MENS2_3 (5m)	1	0.1	7.0%	1.7	1.6	1.7
MENS2_4 (10m)	1	0.1	5.9%	1.7	1.6	1.7
MENS2_5 (15m)	1	0.1	5.0%	1.7	1.6	1.6
MENS2_6 (20m)	1	<0.1	4.4%	1.6	1.6	1.6
MENS2_7 (25m)	1	<0.1	3.9%	1.6	1.6	1.6
MENS2_8 (50m)	1	<0.1	2.4%	1.6	1.6	1.6
MENS2_9 (75m)	1	<0.1	1.7%	1.6	1.5	1.6
MENS2_10 (100m)	1	<0.1	1.3%	1.5	1.5	1.5
MENS2_11 (125m)	1	<0.1	1.1%	1.5	1.5	1.5
MENS2_12 (150m)	1	<0.1	0.9%	1.5	1.5	1.5
MENS2_13 (175m)	1	<0.1	0.8%	1.5	1.5	1.5
MENS2_14 (200m)	1	<0.1	0.7%	1.5	1.5	1.5

Ecological interpretation

Duncton to Bignor Escarpment

The '1% of the critical level' screening threshold is exceeded by all forecast traffic growth 'in combination' throughout the transect at Duncton to Bignor Escarpment. Therefore approximately 9% of Duncton to Bignor Escarpment SAC is affected by 'in combination' ammonia to a greater than imperceptible degree. However, for the affected area (Management Units 1, 2 and 3) the site has been heavily negatively affected by land management in a way that will:

- a) have a much more drastic effect on vegetation than atmospheric pollution; and
- b) will considerably limit the lichen interest of the site to the absence of mature beech trees.

The most recent (2021) condition assessment for Unit 2 states: *'The unit comprises of a large area which has been modified in the past and been re-planted by conifers. These have been removed and the area now consists of vegetation typical of disturbed soil'*. For Unit 3 it states: *'there has been recent forestry works carried*

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out on this unit and as a result 30% of the unit has been felled, and the ground flora and soil have been heavily damaged by the forestry machinery... Some felled branches were stocked and piled up within the woodland, covering the ground flora'. Unit 1 appears to be mainly ash woodland rather than the SAC feature of beech woodland: 'The woodland is mainly comprised of ash which is dominant throughout'. Restoration of the site such that it achieves its conservation objectives therefore depends primarily on addressing these fundamental issues. These changes to the site considerably reduce the likelihood that pollution sensitive lichens will be present in this area. Moreover, the forecast ammonia in combination dose will not prevent establishment of such communities in the future, as such potential will already be limited by the vegetation currently present and the fact that the critical level is forecast to be exceeded by up to 20% in 2039 without any traffic growth. Moreover, it is noted that the Supplementary Advice on the Conservation Objectives for the SAC has a 'maintain' target for air quality rather than a 'restore' target. After 15m back from the roadside ammonia concentrations will be similar in 2039 to those in the 2019 baseline scenario.

It is therefore concluded that no adverse effect on the integrity of Duncton to Bignor Escarpment would arise. In a meeting 12/02/24 Natural England expressed agreement with this conclusion.

The Mens SAC

The '1% of the critical level' screening threshold is exceeded by all forecast traffic growth 'in combination' up to c. 100m from the roadside at The Mens SAC. Therefore approximately 10% of The Mens SAC is affected by 'in combination' ammonia to a greater than imperceptible degree. Moreover, this represents a net deterioration in ammonia as no improving trend from 2019 to 2039 is forecast. On the Supplementary Advice on the Conservation Objectives the SAC has a 'restore' target for air quality: 'Restore concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System'.

However, the annual average critical level for ammonia is exceeded by at least 50% under all scenarios, irrespective of traffic growth, due to existing agricultural sources of ammonia (livestock and fertiliser). Moreover, ammonia concentrations fluctuate greatly due to meteorological factors. Scrutiny of ammonia data from the UKEAP national ammonia monitoring network for a range of sites covering 2010-2019 shows that at rural sites like this one background ammonia concentrations generally fluctuate by more than 1 $\mu\text{g}/\text{m}^3$ (100% of the critical level) throughout the year. As such, small modelled incremental changes in annual average ammonia such as the 0.1 $\mu\text{g}/\text{m}^3$ modelled here for the closest area to the roadside may not be statistically significant due to the large variance in ammonia concentrations. Therefore, care should be taken not to read too much into small forecast changes in average ammonia concentration. Moreover, the growth within Chichester plan area that is likely to make the greatest contribution to ammonia concentrations is in the north of the plan area and is projected to come forward in the latter part of the plan period (from 2030).

Taking these factors into consideration it is concluded that the most appropriate approach to dealing with the forecast increase in ammonia concentrations is to introduce a programme of measures to encourage a further shift from petrol cars and vans³ to ultra-low emission vehicles (ULEVs) over the period to 2039, beyond that modelled to arise purely from implementation of national policies. Automated Number Plate Recognition (ANPR) data for the A272 collected for Horsham District Council indicates that the local area already has a greater proportion of electric vehicles than the average fleet. This suggests that local existing and future car and van owners would be more responsive to a package of such measures than the average motorist. It is not possible to predict how much future ammonia concentrations

³ As these are a major source of vehicular ammonia.

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would be reduced by such measures, since it would be dependent on uptake. However, it is possible to identify what further percentage conversion of petrol cars and vans to ULEVs would be required in order to reduce the ‘in combination’ ammonia impact to 1% of the critical level. Since the impact is not forecast to occur until late in the plan period, this could be used as a performance target in future Local Plan Reviews to confirm whether the measures were on target to achieve their objective, and if not either introduce further measures or potentially amend Local Plan growth in the north of the plan area. **It is considered that given the forecast ‘in combination’ increase in ammonia lies well within the likely annual variation in ammonia concentrations, and with the measures outlined above, a framework would be in place to ensure no adverse effect on the integrity of the SAC arose alone or ‘in combination’ with other plans or projects.**

Table B-5: Realistic Scenario Predicted ‘in isolation’ Annual Nitrogen Deposition at Modelled Ecological Receptors

Figures for 10m from the roadside are greyed out as closer to the roadside edge effects dominate and roadside air turbulence makes model results less reliable. This has been agreed with Natural England. In the ‘percentage of critical level’ columns, yellow indicates no exceedance of ‘1% of critical load threshold’ using IAQM guidance, which advises not using the criterion to more than one significant figure (1%). Green indicates no exceedance of ‘1% of critical level threshold’ used strictly (1.0%), amber means exceedance of the ‘1% of the critical level’ threshold. Amber in the ‘future year DS’ column indicates that exceedance of the critical load is expected in 2039.

Receptor	Critical Load	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Load	Base Year	Future Year DM	Future year DS
DNBG1 (0m)	10	0.1	0.7%	17.1	12.8	12.9
DNBG2 (2m)	10	0.1	0.6%	16.8	12.7	12.7
DNBG3 (5m)	10	0.1	0.6%	16.6	12.5	12.6
DNBG4 (10m)	10	0.1	0.5%	16.2	12.3	12.4
DNBG5 (15m)	10	<0.1	0.4%	16.0	12.2	12.2
DNBG6 (20m)	10	<0.1	0.4%	15.8	12.1	12.1
DNBG7 (25m)	10	<0.1	0.4%	15.6	12.0	12.0
DNBG8 (50m)	10	<0.1	0.2%	15.0	11.7	11.7
DNBG9 (75m)	10	<0.1	0.2%	14.7	11.5	11.5
DNBG10 (100m)	10	<0.1	0.1%	14.5	11.4	11.4
DNBG11 (125m)	10	<0.1	0.1%	14.4	11.4	11.4
DNBG12 (150m)	10	<0.1	0.1%	14.3	11.3	11.3
DNBG13 (175m)	10	<0.1	0.1%	14.3	11.3	11.3
DNBG14 (200m)	10	<0.1	0.1%	14.2	11.3	11.3
MENS1_1 (0m)	10	0.2	1.6%	25.8	19.6	19.8
MENS1_2 (2m)	10	0.1	1.5%	25.5	19.4	19.6
MENS1_3 (5m)	10	0.1	1.4%	25.2	19.2	19.4
MENS1_4 (10m)	10	0.1	1.1%	24.7	19.0	19.1
MENS1_5 (15m)	10	0.1	1.0%	24.4	18.8	18.9
MENS1_6 (20m)	10	0.1	0.9%	24.1	18.7	18.8

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Receptor	Critical Load	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Load	Base Year	Future Year DM	Future year DS
MENS1_7 (25m)	10	0.1	0.8%	23.9	18.6	18.7
MENS1_8 (50m)	10	<0.1	0.5%	23.3	18.3	18.3
MENS1_9 (75m)	10	<0.1	0.4%	23.0	18.1	18.2
MENS1_10 (100m)	10	<0.1	0.3%	22.8	18.0	18.1
MENS1_11 (125m)	10	<0.1	0.3%	22.7	18.0	18.0
MENS1_12 (150m)	10	<0.1	0.2%	22.6	17.9	18.0
MENS1_13 (175m)	10	<0.1	0.2%	22.6	17.9	17.9
MENS1_14 (200m)	10	<0.1	0.2%	22.5	17.9	17.9
MENS2_1 (0m)	10	0.2	1.6%	25.7	19.5	19.7
MENS2_2 (2m)	10	0.1	1.4%	25.4	19.4	19.5
MENS2_3 (5m)	10	0.1	1.3%	25.0	19.2	19.3
MENS2_4 (10m)	10	0.1	1.1%	24.6	18.9	19.0
MENS2_5 (15m)	10	0.1	0.9%	24.2	18.8	18.9
MENS2_6 (20m)	10	0.1	0.8%	24.0	18.6	18.7
MENS2_7 (25m)	10	0.1	0.7%	23.8	18.5	18.6
MENS2_8 (50m)	10	<0.1	0.4%	23.5	18.2	18.3
MENS2_9 (75m)	10	<0.1	0.3%	23.3	18.1	18.1
MENS2_10 (100m)	10	<0.1	0.3%	23.2	18.0	18.0
MENS2_11 (125m)	10	<0.1	0.2%	23.2	17.9	17.9
MENS2_12 (150m)	10	<0.1	0.2%	23.1	17.9	17.9
MENS2_13 (175m)	10	<0.1	0.1%	23.1	17.9	17.9
MENS2_14 (200m)	10	<0.1	0.1%	23.1	17.8	17.8

Ecological interpretation

The '1% of the critical level screening threshold is not exceeded by Chichester Local Plan alone at either Duncton to Bignor Escarpment SAC or The Mens SAC. Therefore, likely significant effects of the Local Plan alone can be dismissed, but impacts 'in combination' with other plans or projects required consideration. These are modelled in Table B-6 overleaf.

TECHNICAL NOTE

Table B-6: Realistic Scenario Predicted 'in combination' Annual Nitrogen Deposition at Modelled Ecological Receptors

Figures for 10m from the roadside are greyed out as closer to the roadside edge effects dominate and roadside air turbulence makes model results less reliable. This has been agreed with Natural England. In the 'percentage of critical level' columns, yellow indicates no exceedance of '1% of critical load threshold' using IAQM guidance, which advises not using the criterion to more than one significant figure (1%). Green indicates no exceedance of '1% of critical level threshold' used strictly (1.0%), amber means exceedance of the '1% of the critical level' threshold. Amber in the 'future year DS' column indicates that exceedance of the critical load is expected in 2039.

Receptor	Critical Load	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Load	Base Year	Future Year DN	Future year DS
DNBG1 (0m)	10	1.1	10.7%	15.7	11.8	12.9
DNBG2 (2m)	10	1.0	9.9%	15.6	11.8	12.7
DNBG3 (5m)	10	0.9	9.0%	15.5	11.7	12.6
DNBG4 (10m)	10	0.8	7.8%	15.3	11.6	12.4
DNBG5 (15m)	10	0.7	7.0%	15.1	11.6	12.2
DNBG6 (20m)	10	0.6	6.2%	15.0	11.5	12.1
DNBG7 (25m)	10	0.6	5.7%	14.9	11.5	12.0
DNBG8 (50m)	10	0.4	3.8%	14.5	11.3	11.7
DNBG9 (75m)	10	0.3	2.8%	14.4	11.3	11.5
DNBG10 (100m)	10	0.2	2.2%	14.3	11.2	11.4
DNBG11 (125m)	10	0.2	1.8%	14.2	11.2	11.4
DNBG12 (150m)	10	0.2	1.5%	14.1	11.2	11.3
DNBG13 (175m)	10	0.1	1.3%	14.1	11.2	11.3
DNBG14 (200m)	10	0.1	1.2%	14.1	11.1	11.3
MENS1_1 (0m)	10	0.8	7.5%	25.8	19.0	19.8
MENS1_2 (2m)	10	0.7	6.9%	25.5	18.9	19.6
MENS1_3 (5m)	10	0.6	6.1%	25.2	18.8	19.4
MENS1_4 (10m)	10	0.5	5.2%	24.7	18.6	19.1
MENS1_5 (15m)	10	0.5	4.5%	24.4	18.5	18.9
MENS1_6 (20m)	10	0.4	4.0%	24.1	18.4	18.8
MENS1_7 (25m)	10	0.4	3.6%	23.9	18.3	18.7
MENS1_8 (50m)	10	0.2	2.3%	23.3	18.1	18.3
MENS1_9 (75m)	10	0.2	1.7%	23.0	18.0	18.2
MENS1_10 (100m)	10	0.1	1.3%	22.8	17.9	18.1
MENS1_11 (125m)	10	0.1	1.1%	22.7	17.9	18.0
MENS1_12 (150m)	10	0.1	0.9%	22.6	17.9	18.0

TECHNICAL NOTE

Receptor	Critical Load	Revised Road Contribution		Revised Total Concentration		
		Absolute Change	Change as % of Critical Load	Base Year	Future Year DN	Future year DS
MENS1_13 (175m)	10	0.1	0.8%	22.6	17.8	17.9
MENS1_14 (200m)	10	0.1	0.7%	22.5	17.8	17.9
MENS2_1 (0m)	10	0.7	7.3%	25.7	19.0	19.7
MENS2_2 (2m)	10	0.7	6.6%	25.4	18.9	19.5
MENS2_3 (5m)	10	0.6	5.8%	25.0	18.7	19.3
MENS2_4 (10m)	10	0.5	4.9%	24.6	18.6	19.0
MENS2_5 (15m)	10	0.4	4.3%	24.2	18.4	18.9
MENS2_6 (20m)	10	0.4	3.7%	24.0	18.3	18.7
MENS2_7 (25m)	10	0.3	3.3%	23.8	18.3	18.6
MENS2_8 (50m)	10	0.2	2.0%	23.5	18.0	18.3
MENS2_9 (75m)	10	0.1	1.4%	23.3	17.9	18.1
MENS2_10 (100m)	10	0.1	1.1%	23.2	17.9	18.0
MENS2_11 (125m)	10	0.1	0.9%	23.2	17.9	17.9
MENS2_12 (150m)	10	0.1	0.8%	23.1	17.8	17.9
MENS2_13 (175m)	10	0.1	0.7%	23.1	17.8	17.9
MENS2_14 (200m)	10	0.1	0.5%	23.1	17.8	17.8

Ecological interpretation

The '1% of the critical load' screening threshold is exceeded 'in combination' throughout the Duncton to Bignor Escarpment SAC transect and up to c.100m from the roadside on The Mens SAC transect.

Duncton to Bignor Escarpment SAC

Even with growth, a net improvement in nitrogen deposition is forecast to 2039 when compared with 2019 baseline deposition rates. Therefore the effect of growth is in terms of a slowing or retardation of the rate of improvement rather than a net deterioration and will not compromise the 'maintain' nitrogen deposition target for the SAC. The hypothetical improvement in nitrogen deposition with no growth is 3.7 kgN (average 0.19 kg/ha per year over 20 years). The forecast improvement with all growth is 2.9 kgN. The retardation due to growth (0.8 kgN) is therefore equivalent to 4 years. In other words when all growth is considered 'in combination' four years of improvements that would occur in the absence of any growth will not arise. To put it another way, with all growth it will take the SAC four years longer to reach the same point it would reach in the absence of any growth. This is a moderate loss of improvement, although none of the SAC is affected to a greater than imperceptible degree by Chichester Local Plan itself.

TECHNICAL NOTE

As already discussed for ammonia, the affected area of the SAC does not currently represent features for which the SAC has been internationally designated, having been heavily affected by land management, or (for Unit 1) consisting of a different habitat. These reduce the sensitivity of those particular management units to nitrogen deposition, in that the clearance and replanting process has a much greater legacy effect on actual and potential ground flora composition (due to soil disturbance and changed exposure to light and rainfall) than would the forecast change in nitrogen deposition. Furthermore, the reason for poor condition is given by The Natural England condition assessment as deer browsing /grazing which implies excessive vegetation removal, rather than excessive growth as might result from nitrogen deposition, is the primary issue. The process of deer browsing/grazing will itself remove deposited nitrogen from the system by removing vegetative growth and will also counteract any excessive growth of more competitive species from residual available nitrogen in the soils. Furthermore, the SAC has a maintain objective for air quality and even allowing for all traffic growth nitrogen deposition will be better in 2039 than is the case in the 2019 base year.

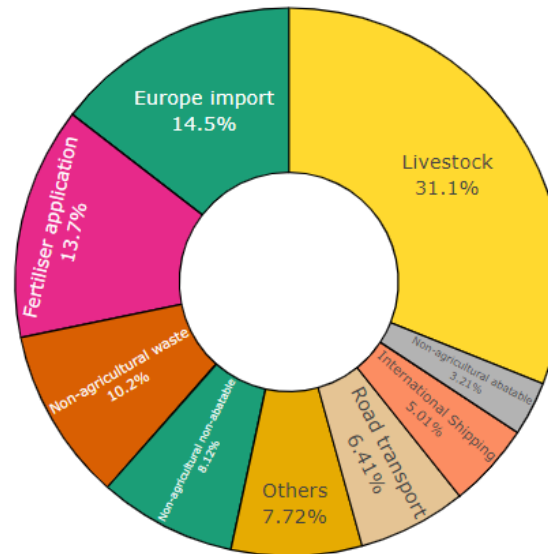
Moreover, the impact of nitrogen deposition on vegetation composition of a given woodland is subject to the strong confounding influence that tree canopy structure places on ground flora species richness, cover and other parameters that might illustrate the influence of nitrogen deposition. The canopy does this through interception of light, rainfall and pollution and the effect of woodland management upon this structure also has a big influence on ground flora. It is therefore entirely possible that no detectable negative effect on ground flora would be perceived in practice.

Finally, the Air Pollution Information System shows that road traffic as a whole is a minor source of nitrogen at Duncton to Bignor Escarpment SAC (6% of all atmospheric nitrogen). In contrast, nearly 50% (44.8%) of atmospheric nitrogen at the SAC derives from agriculture (fertiliser and livestock combined) and over 50% of total nitrogen at the SAC comes from just two sources: agriculture and 'non-agricultural waste' (e.g. composting, landfill and energy from waste). Unlike road traffic (which has a very localised impact zone) agriculture and non-agricultural waste will affect nitrogen deposition across the entire SAC.

TECHNICAL NOTE

Figure 4. Source apportionment for nitrogen deposition at Duncton to Bignor Escarpment SAC, taken from APIS

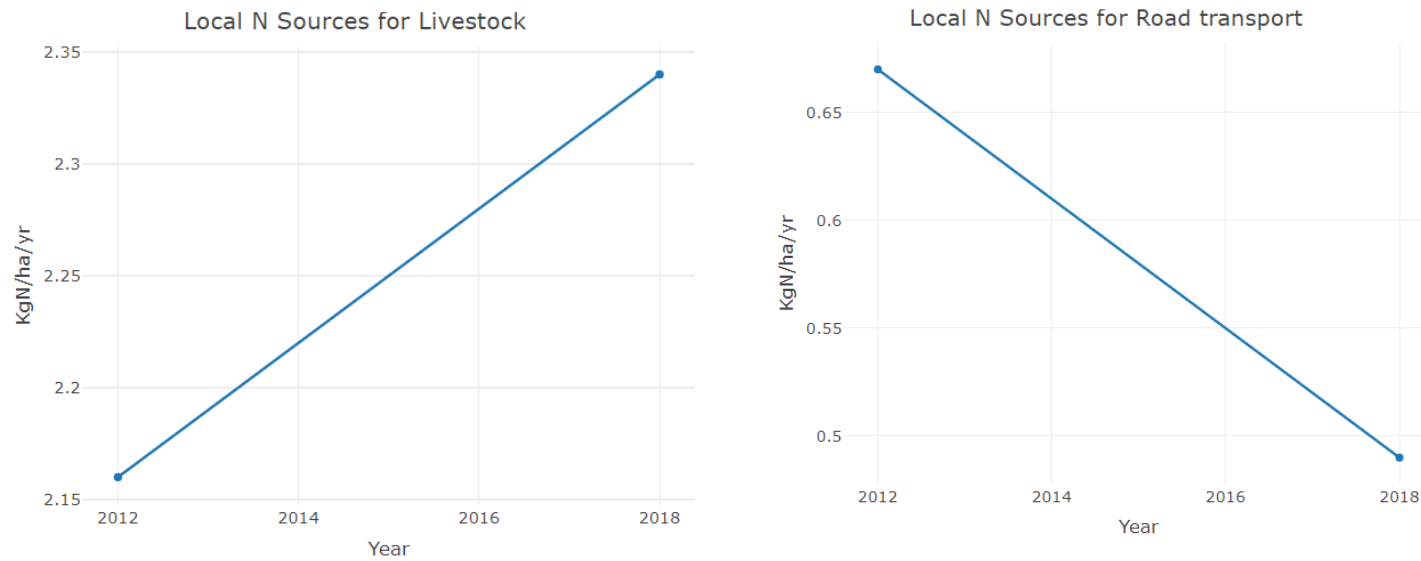
Local contributions to Nitrogen deposition (KgN/ha/yr) from sources (UK)



Therefore, even if the A285 was closed entirely it would have a minimal benefit on nitrogen deposition at Duncton to Bignor Escarpment SAC. Moreover, road traffic is not only a small contributor but is also getting smaller (better) as time goes by, whereas agricultural nitrogen and non-agricultural waste (already by far the biggest sources of nitrogen) are both getting worse. This can be seen from the graphs below, excerpted from APIS.

TECHNICAL NOTE

Figure 5. Trend data for nitrogen/ammonia sources at Duncton to Bignor Escarpment SAC, taken from APIS. While traffic-related nitrogen is improving, other sources of nitrogen are deteriorating (increasing)



For all these reasons the forecast nitrogen deposition is not considered to constitute an adverse effect on the integrity of the SAC (compromising its structure or function), despite it removing four years of potential atmospheric nitrogen reduction that would otherwise arise.

TECHNICAL NOTE

The Mens SAC

Even with growth a net improvement in nitrogen deposition is forecast to 2039 when compared with 2019 baseline deposition rates. Therefore the effect of growth is in terms of a slowing or retardation of the rate of improvement rather than a net deterioration (a net movement away from its air quality target to 'Restore concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System'). The hypothetical improvement in nitrogen deposition with no growth is 6 kgN (average 0.3 kg/ha per year over 20 years). The forecast improvement with all growth is 5.6 kgN. The retardation due to growth (0.5 kgN) is therefore equivalent to less than 2 years. In other words when all growth is considered 'in combination' less than two years of improvements that would occur in the absence of any growth will not arise. To put it another way, with all growth it will take the SAC up to two years longer to reach the same point it would reach in the absence of any growth. This is a relatively minor loss of improvement. Moreover, none of the SAC is affected to a greater than imperceptible degree by Chichester Local Plan itself.

Furthermore, the impact of nitrogen deposition on vegetation composition of a given woodland is subject to the strong confounding influence that tree canopy structure places on ground flora species richness, cover and other parameters that might illustrate the influence of nitrogen deposition. The canopy does this through interception of light, rainfall and pollution and the effect of woodland management upon this structure also has a big influence on ground flora. It is therefore entirely possible that no detectable negative effect on ground flora would be perceived in practice.

For these reasons the forecast nitrogen deposition is not considered to constitute an adverse effect on the integrity of the SAC (compromising its structure or function).

TECHNICAL NOTE

Annex C: Prediction of Future Year Emissions of NO_x and NH₃ from the UK Vehicle Fleet

Introduction

The exhaust pipe emissions of NO_x and NH₃ from traffic on a given road can vary considerably depending on the type of vehicle (car, LGV, HGV etc), the fuel system (i.e. diesel, petrol, hybrid or full electric) its age (and Euro emission class), speed and indeed how the vehicle is driven and maintained.

At a given point in time these variables can be defined, and the emissions calculated. However, this assessment requires prediction of emissions from traffic for a future year representing the Local Plan period. Traffic modelling has been used to provide estimates of the future traffic flows on roads of interest and the Emission Factor Toolkit (EFT developed by Defra) has been used to provide predictions of the likely fleet composition (type of vehicle, age and fuel system).

The EFT provides pollutant emission rates for 2018 through to 2050⁴ and takes into consideration bespoke vehicle fleet information as well as the following information available from the National Atmospheric Emissions Inventory (NAEI):

- fleet composition data for motorways, urban and rural roads in the UK (excluding London).
- fleet composition based on European emission standards from pre-Euro I to Euro6/VI (including Euro 6 subcategories).
- scaling factors reflecting improvements in the quality of fuel and some degree of retrofitting; and
- technology conversions in the national fleet.
- Primary NO₂ (f-NO₂) emission factors for road transport.

The EFT however does not calculate emission of NH₃ from road traffic and a complementary tool has been developed, the 'Calculator for Road Emissions of Ammonia' (CREAM) tool (Air Quality Consultants, 2020). The CREAM tool applies (more limited) measured emissions data of NH₃ from different vehicle types and ages to the fleet compositions data within the EFT. This allows the calculation of NH₃ emissions from traffic in a consistent manner to that of NO_x.

It is important to note that the NAEI does not fully reflect the DfT's 'Transport Decarbonisation Plan' which sets out the UK's pathway to net zero transport in the UK and assumes more rapid fleet electrification than the NAEI.

Future changes in Fleet Composition

Changes to the fleet composition over time are essentially driven by new vehicles entering the fleet (meeting more stringent emission requirements or alternative fuel systems) and old vehicles becoming redundant; this renewal can be accelerated in certain sectors and areas through grants for Low Emission Vehicles, the adoption of charging schemes for more polluting vehicles, or prohibiting the supply of certain types of vehicle.

The EFT utilises predictions of the vehicle split defined by the National Atmospheric Emissions Inventory (NAEI) as presented in Figure 1 which indicates the decline in petrol car sales over the past 5-years and the gradual phasing out of petrol and diesel cars and replacement with hybrid and electric vehicle over the coming decades.

⁴ Emissions outputs for the years 2031-2050 are provided in support of climate assessments and appraisals only. Where emissions are used after 2030, the appropriate caveats around the limitations of the analysis must be included.

TECHNICAL NOTE

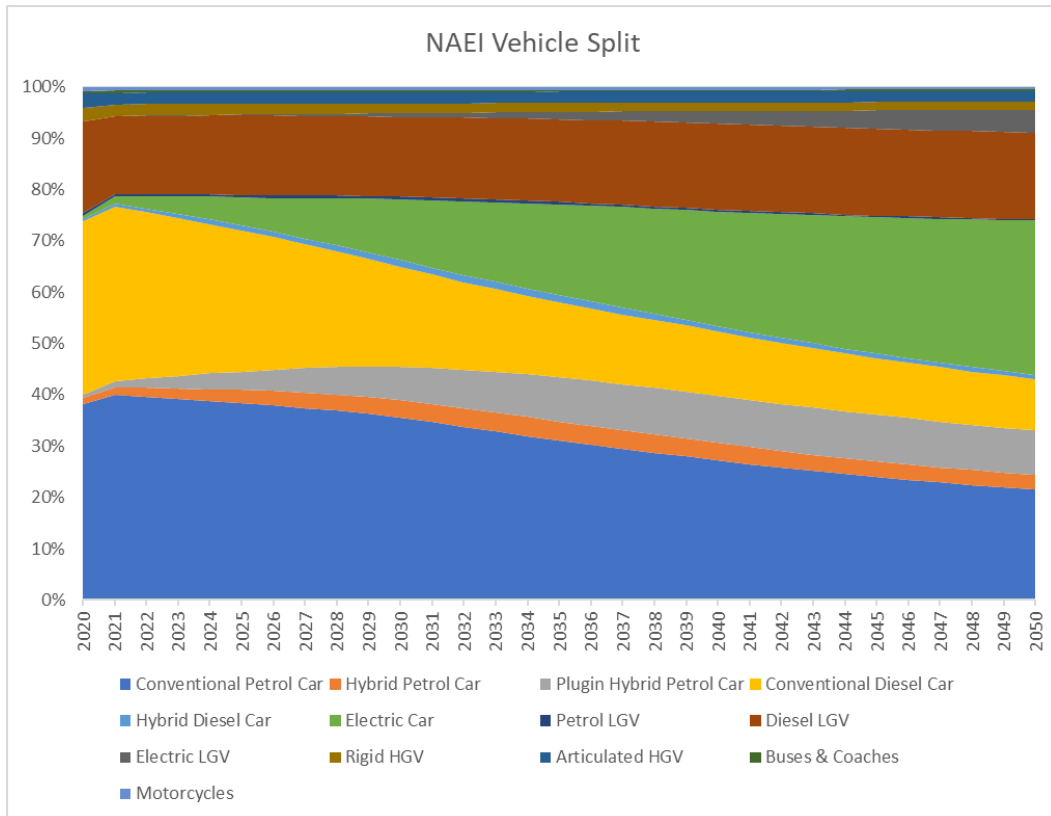


Figure 1: NAEI vehicle fleet composition (2020-2050)

Whilst the NAEI data indicates the overall proportion of different vehicle types, in relation to emissions, the actual distances driven are more relevant. The DfT as part of their transport analysis guidance (TAG) calculate the proportion of vehicle kilometres driven by petrol, diesel, and electric cars by the DfT as part of their transport analysis guidance (TAG). This shows the increasing proportion of petrol cars in the early 2020s as diesel cars become less popular and the increasing proportion of electric cars (which includes all type of hybrid) through the 2030s and beyond.

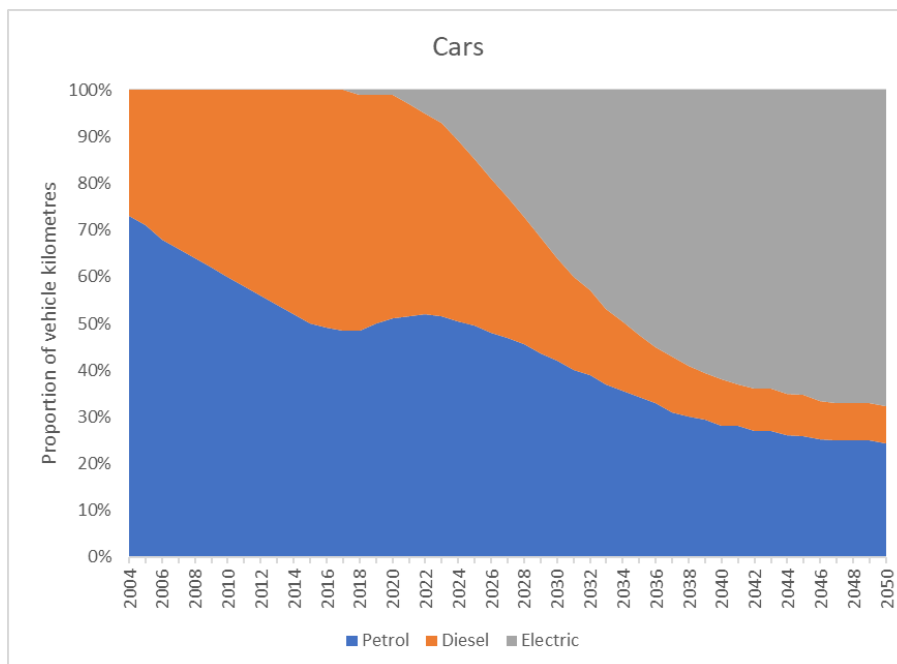


Figure 2: DfT (2004-2050)

TECHNICAL NOTE

The EFT does not apply the TAG predictions, but instead a more detailed breakdown of vehicle by Euro classification as shown in Figure 3. This predicts the shift from older (circa pre-2015) vehicles is almost complete by 2035 with all being Euro 6 (or VI for HDVs) by 2040.

The TAG predictions are more closely aligned (pre 2035) to the DfT's decarbonising transport scenario, which indicates that over 50% of cars will be electric before 2035 and by 2040 the predicted proportion of electric cars increases to 60% in TAG and between 77.6% (DfT upper) and 91.2% (DfT lower).

TECHNICAL NOTE



Figure 3: EFT Euro Class Prediction for Cars, LGVs and HDVs (2030, 2035 and 2040)

TECHNICAL NOTE

Future changes in NOx Emissions

As a result of the changing fleet composition, the road vehicle exhaust emissions of NOx are projected to decrease year-on-year, Figure 4 shows the change in NOx emissions predicted for a rural road in England with 5% Heavy Duty Vehicles (HDVs) travelling at 50kph.

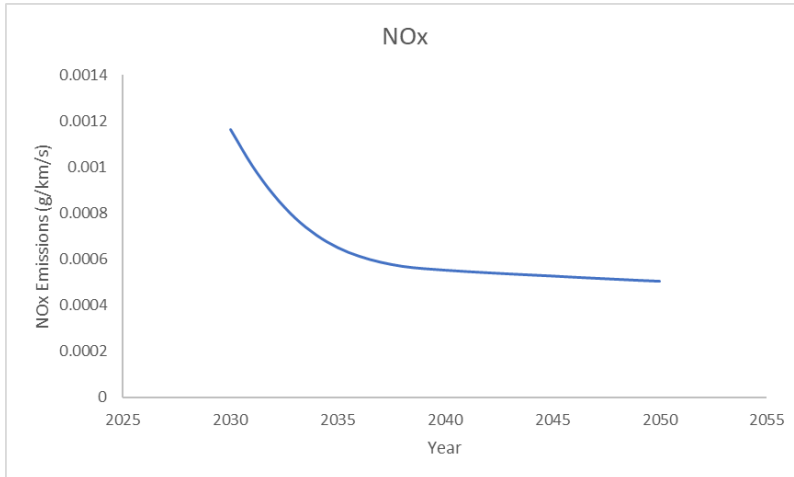


Figure 4: NOx Emissions (EFT V12.0.1, 1,000 AADT, 5% HDV, 50kph)

The graph shows that the decline is greatest between 2030 and 2035 and then relatively constant beyond 2035 reflecting the reduction in diesel cars overall and phasing out of older diesel vehicles (which had higher NOx emissions).

Future changes in NH₃ Emissions

Conversely, the predicted emissions of NH₃ from road traffic calculated by the CREAM tool (which does not predict beyond 2035) increase due to the increasing proportion of petrol vehicle in the fleet over the next decade. This is a result of the assumptions made within CREAM that emissions of NH₃ are largely due to catalyst failure in petrol cars as the car ages and that the current fleet weighted average ammonia emissions for petrol cars apply to all future petrol cars.

Figure 5 shows the change in NH₃ emissions for a rural road in England with 5% HDVs which demonstrates this increasing trend, plateauing towards 2035 as electric vehicles replace internal combustion.

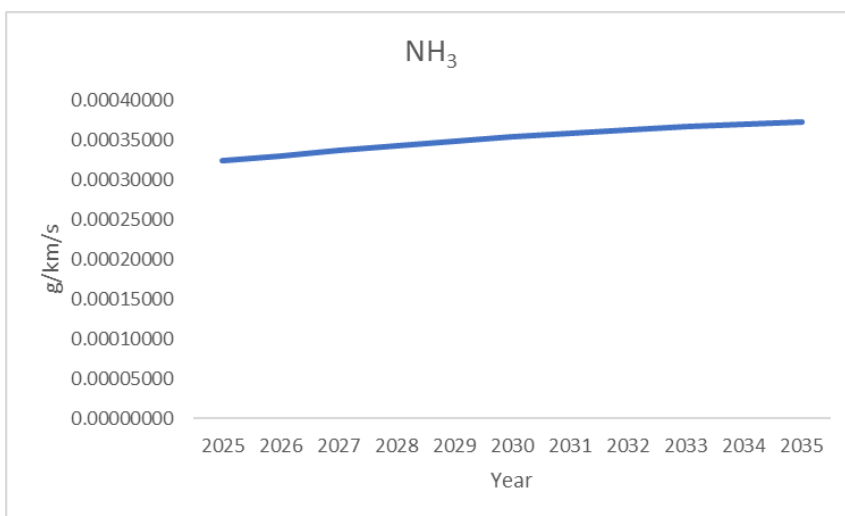


Figure 5: NH₃ Emissions (CREAM, 1,000 AADT, 5% HDV)

TECHNICAL NOTE

Identification of Future Emission Factors

The selection of emission factors for a future year assessment depends partly on a variety of factors.

The original assessment applied data obtained from EFTv11 which was released in November 2021 with projected fleet composition based on 2019 data; there have been a wide range of factors which will have influenced the rate of renewal of the vehicle fleet (political, societal, and economic) in the intervening years.

The EFT was updated in December 2023 (EFTv12.0) and includes updated projections of fleet composition (and indeed emission factors for specific vehicle types) based on more recent data including DfT projections on future new vehicle sales in December 2021. There are still a range of factors that could influence these projections (in particular the delay to the ban on the sale of new petrol and diesel cars from 2030 to 2035) and therefore application of post-2030 emission factors require appropriate consideration of such uncertainty.

In 2034 the NAEI assumes that 18% of the fleet is fully electric (plus 13% hybrid) compared with 25% in 2039. However, this is much more conservative than the TAG prediction of 60% of vehicle kilometres driven by cars will be electric in 2039. To inform the HRA and provide a more realistic future scenario, the EFT (v12.0.1) and CREAM tools have therefore been applied with the assumption that 50% of cars and LGVs are ultra-low emission vehicles (i.e. 100% electric). This draws upon transport projections out to 2050 of the UK's intended decarbonisation of the fleet and alignment with Net Zero as available from the DfT's Transport Decarbonisation Plan (DfT, 2022) and broadly aligns with the lower ambition "Decarbonising Transport Upper" projection. It may still be precautionary given government aspirations for electrification of the vehicle fleet to 2039.

