

Examination of the Chichester Local Plan 2021-2039

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Examination web pages: <https://www.chichester.gov.uk/localplanexaminationtimeline>

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Tony Whitty

Divisional Manager Planning Policy

Chichester District Council

Dear Mr Whitty

Examination of the Chichester Local Plan 2021-2039

1. We are writing further to our letter of 12 June 2024 regarding the examination of the Chichester Local Plan. As you are aware, we are considering the submitted evidence and representations and have commenced drafting our matters, issues and questions for discussion at the hearings. Below we pose some further questions to assist us in this.

Sustainability appraisal

- Q.1 Where and how through the sustainability appraisal (SA) undertaken in the various stages in plan making, have reasonable alternatives been considered, selected and compared, including options in respect of the spatial strategy, amounts of development to be accommodated, strategic policies, specific site allocations and development management policies?
- Q.2 How have existing site allocations 'carried forward' from the adopted Local Plan been considered through the SA process?
- Q.3 Has the SA considered the full extent of the 1,300 dwellings now proposed at Tangmere?

Habitats Regulations Assessment

The statement of common ground with Natural England notes that they disagree with the Habitats Regulations Assessment conclusion that adverse effects on the integrity of the Mens SAC can be ruled out for the impact pathway of increased ammonia.

- Q.4 What, if any measures would be sufficiently certain to be used as mitigation in this regard?
- Q.5 What implications would any such mitigation measures have for the soundness of the Plan?

Local housing need

It is our understanding that the Council has determined the minimum number of homes needed in the plan area through undertaking a local housing need assessment, conducted using the standard method in national planning guidance, as per paragraph 60 of the National Planning Policy Framework (NPPF).

- Q.6 Please confirm whether references to ‘departure from standard method’ set out in section 5 of BP06 Housing Need Background Paper, refer to the application of the presumption in favour of sustainable development as set out in NPPF 11, rather than an alternative method of assessing the minimum numbers of homes required as per NPPF 60.

The housing requirement

It is our understanding that the proposed housing requirement has been determined through the application of the presumption in favour of sustainable development as per NPPF 11 b) ii.

- Q.7 Would the Council please confirm whether the proposed housing requirement has been set solely on the basis of transport issues, as set out in BP06, or whether it is a combination of a number of constraints as implied by paragraph 5.2 of the submitted plan and reported upon in the SA, such as nutrient neutrality/wastewater treatment capacity? If it is the latter, would the Council please direct us to any specific evidence regarding any other constraints which fed into its paragraph 11 b) ii assessment?

Housing land supply

Thank you for providing the Housing Supply Background Paper (BP07). We note that completions data for the year 2023/24 is not yet available and look forward to receiving that in due course.

- Q.8 For us to consider whether there would be a supply of specific, deliverable sites for years one to five after adoption (with the appropriate buffer) we require an up-to-date assessment of deliverable housing sites as per the NPPF definition for that specific period.

Whilst we have details of the existing supply, it would be helpful to us if it could be presented within a specific five year housing land supply paper to include:

- (a) sites with full planning permission and sites with outline planning permission for fewer than 10 dwellings (with overall totals);
- (b) other specific identified deliverable sites as per the NPPF definition (with overall totals); and
- (c) any windfall allowance.

For each site that falls into category (b), please set out the Council’s clear evidence that housing completions will begin in five years.

Please also confirm what the appropriate buffer should be for the calculation of the five year housing land supply as per NPPF 67.

Please provide an overall summary/trajectory of total anticipated supply per annum. For the purpose of this exercise, please assume that the first year following adoption for the calculation of the five year supply will be 2025/26.

- Q.9 It would also be helpful if the Council could quantify specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.

The plan period

NPPF 22 sets out that strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Given that the Council's Local Development Scheme identifies that the intended date of adoption for the Plan is Spring 2025 the submitted plan would not achieve this.

- Q.10 What is the justification for this?

Conclusion

2. Please publish this letter on the Examination website. It would be helpful if you could provide an indication of when you will be able to respond to our questions via the Programme Officer.
3. We are not inviting further submissions from any other party at this stage and will set out in due course when representors may make further submissions. For the avoidance of doubt, other than that specifically requested by us, no further representations, evidence or other written material should be submitted to the examination by any party.

Yours sincerely

P Lewis J Ayres

INSPECTORS