

01 August 2024

Dear Inspectors,

**Chichester District Council response to Inspectors letter of 22 July 2024 (ID02)**

Thank you for your further letter (ID02) to the council posing further questions to assist you with your consideration of the submitted evidence and representations. I have set out the council's response to your questions in turn in the attached table and hope that this will help inform the matters, issues and questions for subsequent discussion at the hearing.

Kind regards

A handwritten signature in blue ink, appearing to read 'Tony Whitty'.

Tony Whitty

Planning Policy Divisional Manager

Matter	Inspectors' Question	CDC Response
<b>Sustainability appraisal</b>		
	<p><b>Q.1</b> 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?</p>	<p>The 'Housing Distribution Background Paper' (<b>BP05</b>) draws together the relevant information from the local plan evidence and sustainability appraisal (SA) process.</p> <p>The 'Chichester Local Plan Review Issues and Options Consultation' (<b>CN09</b>) (the 'Issues and Options') was accompanied by a 'Complete Sustainability Appraisal of the Chichester District Local Plan' (<b>CN11.01</b>) which presented an appraisal of the potential locations for large scale (strategic) development (500+ dwellings) against the SA assessment criteria.</p> <p>The Local Plan Review 2016 – 2035: Preferred Approach (<b>CN04</b>) (the 'Preferred Approach') was accompanied by the 'Sustainability Appraisal for the Chichester Local Plan Review – Preferred Approach' (<b>CN06.03</b>). This presented an appraisal of reasonable alternative (RA) growth scenarios which included three levels of development (650 dpa, 800 dpa and 1000 dpa) (Table 2, pgs. 11 – 13) presents the assessment matrices). The assessment supported 650dpa (para. 4.3.4) and then considered six different spatial distribution options (see Table 3, pgs. 15 -16). Additionally, the Preferred Approach SA presented an appraisal of all development management (DM) policies where major revisions were proposed or new policies were introduced. Where minor revisions were proposed, the SA relied on the adopted Local Plan findings.</p> <p>The Issues and Options SA and Preferred Approach SA were carried out 'in-house' by the Environment Management Team.</p>

Matter	Inspectors' Question	CDC Response
		<p>The preparation of the 'Chichester Local Plan 2021- 2039: Proposed Submission' (<b>SD01</b>) was informed by the 'Sustainability Appraisal of the Chichester Local Plan' (<b>SD03.01 and SD03.02</b>) which was carried out by consultants, AECOM.</p> <p>The following response from AECOM explains their approach to the SA:</p> <p><b>“Overview</b></p> <p>Our approach has long been to focus our reasonable alternatives (RAs) as follows:</p> <ul style="list-style-type: none"> <li>A. Define alternatives as mutually exclusive options.<sup>1</sup></li> <li>B. Define RAs “taking into account the objectives and geographical scope of the plan”.<sup>2</sup></li> <li>C. Ensure that the appraisal highlights pros and cons across the RAs in terms of significant effects, where significance is understood in the context of the plan / plan area.</li> </ul> <p>This was our starting point when looking to define RAs in 2021/22. We then went through a process to define RAs, as explained in Sections 4 and 5 of the SA Report (SAR; where the specific aim is to present “an outline of the reasons for selecting the alternatives dealt with”).<sup>3</sup> As part of that process, account was naturally taken of work undertaken in the past, at the Regulation 18 stage, but our aim was not to present an ‘audit trail’.</p>

<sup>1</sup> In line with definition (1) presented [here](#) aligned with Regulation 12(2) of the SEA Regulations, which requires a focus on “the plan and reasonable alternatives” which might be read as “alternative plans”.

<sup>2</sup> Regulation 12(2) of the SEA Regulations

<sup>3</sup> Schedule 2 of the SEA Regulations

Matter	Inspectors' Question	CDC Response
		<p>Set out below is a detailed discussion of work to explore RAs in 2021/22, as reported in Part 1 of the SAR.</p> <p><b>The SA Report</b></p> <p><b>Part 1</b> of the report deals SA work prior to finalising the Proposed Submission Local Plan and, in particular, explains work undertaken to explore RAs.</p> <p><b>Section 4</b> is the “Introduction” to Part 1. It begins by providing an overview of work undertaken over time, but its primary aim is to explain reasons for focusing RAs in on the key diagram, i.e. the proposed approach to development in order to provide for development needs (as far as possible) alongside delivering on wider plan objectives (to a reasonable extent).<sup>4</sup></p> <p>We believe that a focus on RA key diagrams, which we refer to as ‘growth scenarios’, is a key aspect of SA best practice. However, we are not closed-minded to exploring reasonable alternatives for more discrete aspects of the plan. Section 4 discusses:</p> <ul style="list-style-type: none"> <li>• RAs in respect of employment land and Gypsy and Traveller pitch provision – these are both key issues for the local plan, and there was early acknowledgement that it would not be possible to vary them across the RA growth scenarios (in addition to housing, as the key variable), hence consideration was given to the possibility of exploring stand-alone RAs. Specifically, proportionate consideration is given to possible RAs in Appendix II (employment land) and Appendix III (Gypsy and Traveller pitch provision), but in both cases the conclusion reached is that there are <i>not</i> RAs.</li> </ul>

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<sup>4</sup> Alternatively, the focus might be described simply as the ‘spatial strategy’, but we find that this term can create confusion, as it can imply ‘high level’ alternatives, where as our aim is to define RAs that reflect the level of detail in the key diagram (and, in turn, reflect the “objectives and... scope of the plan”).

Matter	Inspectors' Question	CDC Response
		<ul style="list-style-type: none"> <li>• RAs in respect of thematic policies – there is a brief but proportionate discussion in Section 4 of the SAR, which finds that there are not RAs.</li> </ul> <p>In <b>Section 5</b> (within Part 1 of the report), the aim is to explain the detailed and lengthy process that we (CDC and AECOM) went through in order to arrive at reasonable alternative growth scenarios. It is important to emphasise that this work was undertaken over the course of approximately one year, was highly challenging and added considerable value.</p> <p>Within <b>Section 5</b>:</p> <ul style="list-style-type: none"> <li>• Section 5.1 (Introduction) – introduces the methodological framework under which the process for defining growth scenarios was undertaken (this is AECOM's standard approach).</li> <li>• Section 5.2 (Strategic factors) – discusses top down / strategic factors with a bearing on defining growth scenarios, including with reference to past work going back a number of years.</li> <li>• Section 5.3 (Site options) – discusses work to explore site options in isolation. This is primarily an opportunity to signpost to the council's HELAA, but also supplementary GIS analysis undertaken by AECOM, which is reported in Appendix IV of the report.</li> <li>• Section 5.4 (Parish/ settlement scenarios) – this is a key section, although the main report presents only a summary, with the detail provided in Appendix V. For each settlement in turn, the aim is to consider site options in isolation and in combination (also site-specific alternatives), in the context of strategic factors (e.g. growth quantum parameters and infrastructure issues / opportunities; also accounting for lessons learned through work / consultation / engagement over time), before then defining settlement growth scenarios.</li> </ul>

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		<p>The objective is then to combine settlement growth scenarios to form reasonable growth scenarios for the plan-area as a whole (i.e. alternative key diagrams). However, in this case it was recognised that there was a pragmatic need to give stand-alone consideration to: A) the north of the plan area; and B) the south of the plan area.</p> <ul style="list-style-type: none"> <li>• Section 5.5 – this section combines settlement scenarios in order to arrive at two sets of RA growth scenarios for appraisal and, in turn, consultation.</li> </ul> <p>The final two sections within Part 1 then need not be dwelt upon, but in summary:</p> <ul style="list-style-type: none"> <li>• <b>Section 6</b> – presents an appraisal of the two sets of RA growth scenarios.</li> <li>• <b>Section 7</b> – presents the Council's response to the two appraisals, i.e. in each case, the Council's reasons for supporting the preferred option on balance and rejecting alternatives.</li> </ul> <p>In <b>conclusion</b>, the SA Report presents an appraisal of RAs in respect of the matter at the very heart of the plan, defining those RAs in light of the plan objectives and the most up-to-date evidence, with evidence gathered via a lengthy and involved process over time. This is considered to represent best practice, aligning with the spirit of the legislation and focused firmly on effectively informing both the plan / decision-makers and stakeholders / consultees.<sup>5</sup> This has been AECOM's standard approach over many years, and few if any concerns were raised through consultation. It was also broadly the approach taken at the Regulation 18 stage. Whilst there is naturally a need to remain alive to the possibility of</p>

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<sup>5</sup> A final point to note regarding the legislation is the reference within Regulation 12(2) to focusing appraisal on "the plan and reasonable alternatives...". Read at face value this could be taken as essentially focusing attention on alternative plans, and nowhere in the legislation is there any suggestion of a need to focus attention on individual components of the plan.

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		<p>exploring RAs in respect of more discrete issues / policy areas, SA practice over the past 20 years has taught us the importance of a carefully targeted approach with a firm focus on not distracting from key issues, opportunities, impacts and choices at the heart of the plan.</p> <p>Finally, it is important to note that a number of interim appraisal steps were taken over the course of the plan-making process outside the two key consultation stages discussed above. These interim appraisal and informal consultation stages focused on 'growth scenarios' and are discussed in SA Report."</p>
	<p><b>Q.2</b> How have existing site allocations 'carried forward' from the adopted Local Plan been considered through the SA process</p>	<p>The following response from AECOM explains their approach to consideration of existing site allocations from the adopted Local Plan through the SA process:</p> <p>"As an initial point, it is important to say that we do not consider individual site options to be 'reasonable alternatives' in light of the discussion above (also see discussion in <b>Section 4</b> of the SA Report). As such, set out below is discussion of:</p> <ul style="list-style-type: none"> <li>• Consideration of existing allocations as part of work to explore RAs (SAR <b>Part 1</b>)</li> <li>• Consideration of existing allocations as part of work to appraise the Draft Plan (SAR <b>Part 2</b>).</li> </ul> <p><b>Part 1 of the SA Report</b></p> <p>Beginning with Section 5.3 (Site options) this primarily signposts to the Housing and Economic Land Availability Assessment (HELAA), which clearly highlights existing allocations. All site options are then discussed in Section 5.4, and specifically within its supporting appendix (Appendix V).</p>

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		<p>As a broad point, it is important to say that there is a very strong case for rolling forward existing allocations in the context of a plan where there are limited supply options / it is a challenge to provide for development needs. This is particularly the case where there is a resolution to grant planning permission. It is not at all common practice to 'de-allocate' sites, and focusing overly on options for de-allocation could make for challenging plan-making nationally. That said, it is of course recognised that there is the theoretical possibility of de-allocation, and in some plan contexts there may be a case for exploring de-allocation options, given strategic and/or site-specific factors.</p> <p>In this context, proportionate consideration is given to existing allocations within Appendix V (i.e. the sites shaded brown in the maps shown at the start of each settlement-specific discussion). There are not very many such sites and, as it transpires, in no case is there any discussion of de-allocation or revising downwards the number of homes supported. This is in the context of both strategic factors (including the challenge of providing for development needs in full) and site-specific factors (with officers and AECOM obviously alive to the possibility of existing allocations facing delivery challenges, local opposition etc).</p> <p>The existing allocation given the most attention in Appendix V is Site HKD0001a at Kirdford (a site allocated in the made neighbourhood plan), where the focus of discussion is supporting a level of growth over-and-above that supported by the existing allocation (see page 106 of the SAR).</p> <p>Finally, we recognise that existing allocations were not subjected to GIS analysis (Appendix 4 of the SAR). This reflected challenges with data gathering, e.g. needing to account for changes to site boundaries subsequent to the HELAA. We do not see this as a major issue for two reasons:</p>



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		<ul style="list-style-type: none"> <li>• GIS analysis was a minor step in the process of defining growth scenarios (Section 5 of the SAR). It is not relied upon in order to demonstrate, or as part of demonstrating, that work has been undertaken to explore RAs.</li> <li>• In practice there were very few existing allocations that were a focus of plan-making, in the sense that there was potentially a choice to be made regarding whether/how to take forward the allocation. As discussed, in practice attention focused on Site HKD0001a at Kirdford, and there is quite detailed discussion of this site and others at Kirdford throughout the SAR, with nothing lost by the lack of GIS analysis (also, an adjacent site is subject to the analysis).</li> </ul> <p><b>Part 2 of the SA Report</b></p> <p>The Draft Plan appraisal presented in <b>Part 2</b> of the SAR (Section 9) aims to be targeted and concise, focusing firmly on key issues and avoiding distracting discussion of non-issues. Existing allocations are accounted for, but are not a focus of the appraisal, because it is appropriate to focus attention on non-committed proposed allocations. There is quite extensive discussion of the challenge created by committed sites in terms of community infrastructure capacity, and broad community objectives, along the main east-west corridor in the south of the plan area. Also, there is discussion of settlement separation as an issue, in light of committed sites in combination with new proposed allocations, including east of Chichester.”</p>
	<p><b>Q.3</b> Has the SA considered the full extent of the 1,300 dwellings now proposed at Tangmere?</p>	<p>The addition of 300 dwellings at the Tangmere Strategic Development Location (SDL) was considered as part of the 'Option 1A' scenario in the 'Sustainability Appraisal for the Chichester Local Plan Review – Preferred Approach' (<b>CN06.03</b>). The assessment is under 'AL14 Land West of</p>

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		<p>Tangmere' (which became Policy A14 in the Proposed Submission Local Plan (<b>SD01</b>)) on pages 66 -68.</p> <p>The following response from AECOM explains their approach to consideration of the full extent of the 1,300 dwellings proposed at Tangmere through the SA process:</p> <p>“Discussion of growth scenarios for Tangmere is presented across pages 90 – 91 of the SAR. The existing West of Tangmere strategic allocation is discussed only briefly because:</p> <ul style="list-style-type: none"> <li>• It has a resolution to grant planning permission for 1,300 homes.</li> <li>• The broad strategic context meant there was a limited case for exploring lower growth at Tangmere, namely the need to maximise growth (within reason) at locations with limited constraints in terms of water neutrality, nutrient neutrality and/or A27 capacity (including recognising that as a strategic site West of Tangmere has some merit in transport terms, e.g. it will deliver community and sustainable transport infrastructure in support of modal shift).</li> <li>• Officers and AECOM were not aware of any clear or significant arguments for nonetheless exploring alternatives, e.g. de-allocation or support for a more modest scheme. It was recognised that the site had previously been allocated for significantly lower growth, and with hindsight this might have been explained in the SAR, but in the view of officers and AECOM support for the 1,300 home scheme with a resolution to grant outline permission was clearly justified.”</li> </ul>
<p><b>Habitats Regulations Assessment</b>  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.</p>		

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	<p><b>Q.4</b> What, if any measures would be sufficiently certain to be used as mitigation in this regard?</p>	<p>Section 3 of Chichester Local Plan Review Addendum to Habitats Regulations Assessment Pre-Submission Modification (April 2024 (AECOM) <b>(SD11)</b>) addresses the issue of air quality and includes Appendix A – Air Quality Technical Note. The technical note (numbered as Pages 16 and 17 of 30) refers to the specific issues relating to The Mens SAC and identifies mitigation measures proposed to address the issue. This approach is considered to provide sufficient certainty, is appropriate and sound.</p> <p>However, the council has noted Natural England does not currently agree with this position and therefore Chichester District Council and Horsham District Council, as the affected authorities, continue to work together with Natural England to align the approaches.</p>
	<p><b>Q.5</b> What implications would any such mitigation measures have for the soundness of the Plan?</p>	<p>The mitigation measures set out in Appendix A – Air Quality Technical Note of Chichester Local Plan Review Addendum to Habitats Regulations Assessment Pre-Submission Modification (April 2024 (AECOM) <b>(SD11)</b>) (numbered as Pages 16 and 17 of 30) provide an appropriate and acceptable form of mitigation to provide a sound plan and ensure no adverse effect on the integrity of the SAC arises alone or 'in combination' with other plans or projects.</p>
<p><b>Local housing need</b> 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).</p>		
	<p><b>Q.6</b> Please confirm whether references to 'departure from standard method' set out in section 5 of BP06 Housing Need Background Paper, refer to the</p>	<p>The reference to 'departure from standard method' does refer to the application of the presumption in favour of sustainable development set out in NPPF paragraph 11, rather than an alternative method of assessing the</p>

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	<p>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.</p>	<p>number of homes required as per NPPF paragraph 60. This can be amended if the Inspectors consider that it would help provide clarity?</p>
<p><b>The housing requirement</b> 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.</p>		
	<p><b>Q.7</b> 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?</p>	<p>The proposed housing requirement has been set solely on the basis of transport issues, as set out in BP06. This has been clarified in the 'Council's suggested modifications schedule' (April 2024, <b>SD10.01</b>) modification reference CM156 which reads as follows:  "However, constraints particularly to the capacity of the A27 has <b>have</b> led to the council planning for a housing requirement below the need derived from the standard method, of 535 dpa in the southern plan area and a further 40 dpa in the northern plan area, a total <b>supply requirement</b> of 10,350 dwellings over the plan period from 2021 – 2039."</p> <p>Nutrient neutrality, water neutrality and wastewater treatment capacity are all constraints which have influenced the distribution and level of growth within different parts of the plan area, as reported in the SA (<b>SD03.01 and SD03.02</b>) Box 5.1 and 5.2, and as such have not fed into the paragraph 11 b) ii assessment.</p>
<p><b>Housing land supply</b> 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.</p>		

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	<p><b>Q.8</b> 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.</p>	<p>The council are currently updating the land supply position to as at 1 April '24 (an update to the estimated position set out at submission). The monitoring data for the year 23/24 has been made available by West Sussex County Council to support updating our position as soon as possible ahead of examination.</p> <p>The council now have the final dataset to complete the review of sites and to update the housing supply position and Local Plan trajectory.</p> <p>It is expected that this will be available for publication by mid-September.</p> <p>The responses below aim to show where the latest available information can be found prior to the update.</p>
	<p>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:</p> <p>(a) sites with full planning permission and sites with outline planning permission for fewer than 10 dwellings (with overall totals);</p>	<p>Appendix A of the Housing Supply Background Paper (<b>BP07</b>) and the Housing Trajectory shown in Appendix 6 of the Councils suggested modifications schedule - Appendices 1-7 (<b>SD10.02</b>) list the sites in the following categories:</p> <ul style="list-style-type: none"> <li>• Sites of 10+ dwellings currently under construction</li> <li>• Sites of 10+ dwellings with an outstanding detailed planning permission</li> <li>• Sites of 10+ dwellings with an outstanding planning permission</li> <li>• Permissions on small sites 5-9 dwellings</li> <li>• Sites allocated in Local Plan 2014-2029</li> <li>• Sites allocated in Neighbourhood Plans</li> <li>• New Strategic and Parish Allocations</li> <li>• And Sites 5+ dwellings permitted after 1<sup>st</sup> April 23 – (this table will be replaced by sites permitted after 1<sup>st</sup> April 24 when the position is updated).</li> </ul>

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		<p>At the time of submission, the data for a full monitoring year was not available for small sites 1-4 dwellings, and a full site list was not submitted. The submission figure of 167 was calculated using:</p> <ul style="list-style-type: none"> <li>• Known commitments of 132 net dwellings listed in Appendix 2 Table A.1 of 5YHLS Position Statement (1st April 2023) (CD07)</li> <li>• Review of new permissions since 1<sup>st</sup> April 23 (date available to 29<sup>th</sup> February 24) - 35 net dwellings</li> </ul> <table border="1" data-bbox="1122 568 1845 1251"> <tbody> <tr> <td>Small sites 1-4 dwellings as at 1<sup>st</sup> April 23</td> <td>132 dwellings</td> </tr> <tr> <td>Averaged over 3 years 23/24-25/26</td> <td>(44 dwellings per annum)</td> </tr> <tr> <td>Remove estimated completion figure for 23/24</td> <td>-44 dwellings</td> </tr> <tr> <td>Remaining small sites 1-4 dwellings</td> <td>88 dwellings</td> </tr> <tr> <td>New permissions small sites 1-4 dwellings 1<sup>st</sup> April 23 – 29<sup>th</sup> February 24</td> <td>+35 dwellings</td> </tr> <tr> <td>Total small sites 1-4 dwellings for estimated 1<sup>st</sup> April 24 position</td> <td>123 dwellings</td> </tr> <tr> <td>Average over 3 years 24/25-26/27</td> <td>(41 dwellings)</td> </tr> </tbody> </table> <p>The updated position will lower the small sites total, as the figure for 23/24 will be moved to completions, and delivery will again be</p>	Small sites 1-4 dwellings as at 1 <sup>st</sup> April 23	132 dwellings	Averaged over 3 years 23/24-25/26	(44 dwellings per annum)	Remove estimated completion figure for 23/24	-44 dwellings	Remaining small sites 1-4 dwellings	88 dwellings	New permissions small sites 1-4 dwellings 1 <sup>st</sup> April 23 – 29 <sup>th</sup> February 24	+35 dwellings	Total small sites 1-4 dwellings for estimated 1 <sup>st</sup> April 24 position	123 dwellings	Average over 3 years 24/25-26/27	(41 dwellings)
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		<p>phased over 3 years not 4. These figures were included at submission as the sites completed in 23/24 were not yet known.</p>
	<p>(b) other specific identified deliverable sites as per the NPPF definition (with overall totals); and</p>	<p>Sites phased to deliver within Years 1-5 as listed in Appendix A of the Housing Supply Background Paper (<b>BP07</b>) are considered deliverable as per the NPPF definition.</p>
	<p>(c) any windfall allowance.</p>	<p>Paragraphs 3.30-3.36 of the Housing Supply Background Paper (<b>BP07</b>) set out the latest position of windfall allowance, including the methodology used for calculation at the time of submission. This is calculated at 60 dwellings per annum from 26/27 (to avoid double counting), totalling 720 dwellings over the plan period.</p>
	<p>For each site that falls into category (b), please set out the Council's clear evidence that housing completions will begin in five years.</p>	<p>Evidence for inclusion of the sites considered deliverable which have outline permission or do not have planning permission is currently being updated for inclusion in the next iteration of the 5YHLS position statement and Housing Supply Background Paper, as for a number of sites there has been progress since submission.</p> <p>Where available, site update forms or statements of common ground with developers will be published with the requested 5YHLS paper.</p>
	<p>Please also confirm what the appropriate buffer should be for the</p>	<p>The appropriate buffer to be used for the calculation of five year housing land supply is 5% as the council has met the requirements of the Housing Delivery Test.</p>

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	<p>calculation of the five year housing land supply as per NPPF 67.</p> <p>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.</p>	<p>The Housing Trajectory shown in Appendix 6 of the 'Councils suggested modifications schedule - Appendices 1-7' (<b>SD10.02</b>) sets out the total anticipated supply per annum for the plan period. This along with Table 18 in the Housing Supply Background Paper (<b>BP07</b>) shows an estimate of 5.32 years supply for the year 25/26.</p>
	<p><b>Q.9</b> 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.</p>	<p>The Housing Trajectory shown in Appendix 6 of the 'Councils suggested modifications schedule - Appendices 1-7' (<b>SD10.02</b>) sets out estimated phasing for each year of the plan period. Years 1-5 for the estimated position as at 1 April 24 are highlighted by a purple border in the trajectory and are considered deliverable. Sites beyond this period, whilst phased by year are not clearly defined as delivering between 6-10 years or 11-15 years. The updated position and requested supply paper can change the format of the trajectory to highlight these periods.</p>
<p><b>The plan period</b></p> <p>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.</p>		
	<p><b>Q.10</b> What is the justification for this?</p>	<p>The initial work on the Local Plan started in 2017, with the Issues and Options consultation which was looking at a plan period up to 2034 (<b>CN09</b>). The Preferred Approach consultation document (<b>CN04</b>) in 2018 then extended the plan period to 2035. Due to the complexity of the issues arising at and following Regulation 18 (including new issues such as water</p>



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		<p>neutrality) it took the council a number of years to progress the plan to Regulation 19. In the interim period between Regulation 18 and Regulation 19 consultations, relevant evidence documents were updated and the plan period was further extended to 2039.</p> <p>At the time of the publication of the Regulation 19 Proposed Submission Local Plan 2021 - 2039 (<b>SD01</b>) consultation in early 2023, this was sufficient to ensure a 15 year plan from adoption, which was timetabled for summer/autumn 2024. It should also be noted that the plan period is 18 years in total. However, due to the high volume of representations received at Regulation 19 and the need to continue to work to resolve complex issues, namely in relation to the strategic highway network, meant that submission was delayed until May 2024 and the likely adoption date pushed back to spring 2025.</p> <p>This was flagged up in the PAS Self-Assessment Toolkit (<b>CD04</b>) and we anticipated that this would be an issue for discussion through the examination. The council is mindful that to extend the plan period to 15 years from adoption would require various elements of the evidence base to be revisited and updated, which has potentially significant time and cost implications. The council is committed to progressing the local plan, rather than further delaying the plan.</p> <p>As set out in the 'Council's suggested modifications schedule' (<b>SD10.01</b>) modification reference CM379 there is a suggested additional policy, 'Policy M1: Review of the Local Plan', which commits to an early review of the Local Plan (i.e. before the five-year period expiring). This is in addition to the requirement to review plans every five years, which would also ensure the longer-term planning for the Chichester plan area would be addressed.</p>