

Chichester Local Plan: Key Policies 2014-2029

A Balanced Approach to Housing Provision



April 2014

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1 . Introduction

1.1 Due to the range and severity of identified constraints, the Plan is not able to meet the area's objectively assessed housing needs in full. The planned housing provision is therefore based on the level of development that can be realistically and sustainably delivered within the period, having regard to the potential development capacity of the area. The process by which the constraints and housing capacity of the area has been assessed is explained in detail in this background paper.

1.2 The paper is structured as follows:

1. Local Plan Strategy
2. Constraints to Development
3. Mitigation of Constraints
4. Delivery of Development
5. Conclusion

2.1 The Local Plan proposes housing provision at a rate of 410 dwellings per annum and this is the highest level of growth capable of being supported and met the lower end of the range of Objectively Assessed Need (OAN) for housing⁽¹⁾. More recently revisions to the calculation of OAN mean that the provision in the plan is now some 50 dwellings per annum below the lower end of the range for OAN⁽²⁾.

2.2 The Council has taken a positive approach to planning for new development, in line with the National Planning Policy Framework (NPPF)⁽³⁾. Throughout the consultation process concerns have been expressed over accommodating inappropriate and harmful levels of growth within the outstanding natural environment. The Council has worked collaboratively with the other Coastal West Sussex authorities to produce a common evidence base to assess housing needs⁽⁴⁾. The authorities recognise the common constraints affecting their ability to meet identified housing needs, given the amount of land available between the South Downs National Park and the sea. It should be noted that (based on realistic assumptions about the scale of development that the National Park can deliver) the rate of housing proposed for the plan area is in line with the now revoked South East Plan and a substantial increase over past rates of housing development achieved.

2.3 The Council has identified three strategic development locations and allocated a housing number for each parish. Most of the sites for development in each parish will be identified in neighbourhood plans. The Council is working constructively with the promoters of the strategic sites proposed in the Plan to ensure that they are deliverable and sustainable.

2.4 The plan area is divided into 3 distinct areas:

- The North of the Plan area
- The East/West Corridor
- The Manhood Peninsula

2.5 The Plan proposes that the East/West Corridor is the focus for new development, including the identification of three strategic development locations. It is considered that this is the most sustainable location for development in terms of proximity of access to goods and services (thereby minimising the need to travel) but also the availability of more sustainable alternative modes of transport to the private car (i.e. walking, cycling, buses and trains). Evidence indicates that the landscape impact of significant amounts of new development will not be as severe in the East/West corridor as the other more remote parts of the plan area, however, potential harm to the setting of the national park is a consideration.

2.6 The Manhood Peninsula has a limited amount of new development proposed in the Plan, due to the following factors:

- The potential to harm the flat, open landscape in close proximity to the Chichester Harbour AONB, Pagham Harbour and the undeveloped coast

1 [Housing Study \(Duty to Cooperate\) Coastal West Sussex \(July 2013\)](#)
2 [Assessment of Housing Development Needs Study: Sussex Coast HMA](#)
3 [National Planning Policy Framework \(para 14, 15 and 17\)](#)
4 [Local Strategic Statement for Coastal West Sussex \(Oct 2013\)](#)

2 . Local Plan Strategy

- The low lying nature of the land which is vulnerable to tidal flood risk (particularly with the potential for sea level rise) and has poor land drainage which leads to existing problems of surface water flooding
- Poor road access with the need to cross or use the busy A27 to access Chichester (and beyond) for higher order services and employment
- Avoidance of potential harm to the nature conservation of Chichester Harbour, Pagham Harbour and the Medmerry realignment.

2.7 The north of the Plan area has a very limited amount of new development proposed in the Plan, due to the following factors:

- The potential to harm the remote rural landscape of the Low Weald and the setting of the South Downs National Park
- The lack of local employment, services and facilities requires travel to other areas
- The reliance on the private car as the only realistic mode of transport in this area.

3 . Constraints to Development

3.1 The Council has used the detailed evidence base examining the different landscape types to assess the appropriate locations for development and the scale of development that is appropriate in those locations. It considers that the landscape of the north of the Plan area would suffer harm from any significant scale of development⁽¹⁾. The Manhood peninsula can accommodate a limited amount of development without harm to the landscape and the East/West corridor can assimilate more substantial amounts of development into the landscape without significant harm.

3.2 Some respondents to the Local Plan consultations believe that the Council is already proposing a scale of development that will be harmful to the landscape. The Council is of the view that the limit to the amount of development that can be built without harm to the landscape has been reached and any substantial increase to development within the East-West corridor would result in substantial harm. This is not just at a local scale but there would be harm at the sub-regional scale. The setting of the Chichester Harbour AONB and the South Downs National Park would be adversely affected with a substantial increase in development in this area. Some of the gaps between settlements are relatively small and allocating more land for development would be likely to lead to a change to the settlement pattern from a series of villages⁽²⁾ to a continuous built up area. It should be noted that there is virtually continuous urban development along the south coast between Southampton and Brighton and that the area between Chichester and Emsworth and parts of the Manhood peninsula are the last significant remaining areas of undeveloped coast. The NPPF states that local planning authorities should maintain the character of the undeveloped coast and protect its distinctive landscape⁽³⁾.

3.3 A recent planning appeal decision relating to Land north of Keepers Wood, Lavant Road, Chichester⁽⁴⁾ gives strong weight to the Council's approach. The application proposed development of 92 dwellings on the northern edge of Chichester, in the 'strategic gap' between the City and Lavant and close to the National Park boundary. In dismissing the appeal, the planning inspector gave strong weight to the value of the 'strategic gap', appreciating its purpose to prevent the coalescence of the City and the Lavant villages, maintaining their separate identity and amenity. He further commented that the 'strategic gap' "*is not just a separating wedge of undeveloped land, but a space across which to appreciate (in this case) the transition from suburb to secluded village (or vice versa).*" Although concluding that the site was in a sustainable location and that there was a presumption in favour of sustainable development (due to the housing shortfall in the District), he concluded that the proposal would result in severe and irrevocable damage to the landscape, countryside and character of the northern edge to the City and would diminish the impact and function of the 'strategic gap'. Therefore, the potential irreversible damage resulted from allowing development significantly and demonstrably outweighed the presumption in favour of sustainable development.

1 [Landscape Capacity Assessment – Extension \(2011\)](#)[Landscape Capacity Assessment \(2009\)](#)[The Future Growth of Chichester: Landscape and Visual Amenity Considerations \(2005\)](#)

2 [Settlement Capacity Profiles \(Oct 2013\)](#)

3 [National Planning Policy Framework para 114](#)

4 [Planning Portal \(Appeal reference: APP/L3815/A/13/2200123\)](#)

3 . Constraints to Development

3.4 Whilst the designation of the South Downs National Park is not incompatible with densely built up areas (e.g. the boundary of the park is adjacent to the built up areas of Brighton and Worthing), the Council considers that the urbanisation of the coastal plain, south of the National Park within the Chichester Plan area, would be detrimental to the setting of the National Park, contrary to advice in the NPPF⁽⁵⁾ and the first purpose of the designation of the National Park⁽⁶⁾. Part of the enjoyment and experience of being in the National Park in this part of West Sussex is the existence of views over the relatively undeveloped coastal plain and the arms of Chichester Harbour interspersed within farmland.

3.5 Whilst the Council accepts that the strategic development locations may have some impact on the setting of the National Park, it believes that it is possible to mitigate this impact. However, were the scale of development to be substantially increased in the East/West corridor, mitigation would not be possible and the setting of the National Park would be harmed by becoming similar in character to areas further east along the coast.

3.6 Similar constraints apply to the setting of the Chichester Harbour AONB. The NPPF⁽⁷⁾ makes it clear that this national landscape designation should have the highest status of protection. Limited amounts of development will take place either within or in close proximity to the AONB. However, the Council believes that any substantial increases in development within the area between Chichester and Emsworth, or on the Manhood peninsula, would be likely to cause harm to the AONB. Firstly, its rural setting would become urbanised, but also it would experience increased levels of noise and light pollution, traffic and activity.

3.7 The overall character of the Plan area remains largely rural, despite the rapid extension of the adjacent urban areas of Hampshire and the Sussex Coast, such as Worthing and Brighton. Chichester District as a whole (including the National Park). According to DEFRA's classification (shown in the table below), 100% of Chichester District is defined as Rural, comprising a mix of Rural Town, Village and Dispersed settlements⁽⁸⁾. It should be noted that Chichester is the only local authority along the coast between Southampton and Brighton that DEFRA classifies as rural.

DEFRA Rural and Urban Area Classification (2009)

Urban/rural split	Population (mid 2009 estimates)	Urban Population	Total Rural Population	Of which:		
				Large Market/Rural Town	Village	Dispersed
Adur	59,571	99%	1%	-	-	100%
Arun	140,841	93%	7%	34%	46%	20%

5 [National Planning Policy Framework para 115](#)

6 [Environment Act 1995 – Section 61\(1\)\(a\) sets as a statutory purpose to conserve and enhance the natural beauty, wildlife and cultural heritage of the area](#)

7 [National Planning Policy Framework paras 115 & 116](#)

8 [Defra Classification of Local Authority Districts and Unitary Authorities in England: A Technical Guide](#)

3 . Constraints to Development

Chichester	106,518	-	100%	63%	23%	14%
Crawley	99,747	100%	-	-	-	-
Horsham	122,247	39%	61%	59%	20%	21%
Mid Sussex	127,210	-	100%	83%	10%	7%
Worthing	97,595	100%	-	-	-	-
West Sussex	753,729	58%	42%	69%	18%	13%

3.8 A characteristic of the area is its network of small to medium sized towns and villages which retain the feeling that the countryside is never far away. The quality of the local environment is something that both local communities and key partners of the Council want to protect and enhance. In a Citizen's Panel survey in 2008, 87% of residents stated that the scenery, landscape and green spaces was the characteristic they liked most about Chichester District, whilst protecting green spaces and wildlife was rated the most important community priority⁽⁹⁾.

3.9 The settlement pattern is predominantly rural with development largely contained in small settlements. Chichester is the only larger settlement and the other settlements do not have access to a full range of facilities. There are significant gaps in the urban development in the east/west corridor providing settlements with a separate identity and environmental connections between the South Downs National Park and Chichester and Pagham Harbours. Given the amount of development proposed in the Plan in the east/west corridor and the cumulative impact of proposals within Arun district (including horticulture) some of these connections and separate identities are in danger of being lost.

3.10 Strategic development locations around Chichester also have the potential to have an adverse impact on the setting of the historic city of Chichester. Of particular importance are views of the cathedral spire (which is the only cathedral spire in England that can be seen from the sea). The Council believes that it will be possible to mitigate the impact of development currently proposed through careful and detailed masterplanning, however, were there to be any significant increase in the amount of development around Chichester this would be likely to cause harm to the setting of the city contrary to policy set out in the NPPF⁽¹⁰⁾.

3.11 Many respondents to the Local Plan consultation believe that the Council has already allocated too much development in the vicinity of Chichester (e.g. the Chichester Society) and this will be harmful to the heritage of the city, particularly through the identification of the West of Chichester site, which breaches the current boundary of the built form of the city along the line of the former railway. Concerns have been expressed that the growth proposed in the Plan will have an adverse impact on the historic environment of the city centre through increased traffic movements, footfall and parking.

9 [Chichester District Council 'The Exchange' Panel survey \(July 2008\)](#)

10 [National Planning Policy Framework para 129](#)

3 . Constraints to Development

3.12 There are many historic conservation areas located within the plan area. Whilst new development can conserve and enhance a conservation area, a scale of development that would dominate an existing village conservation area would not be appropriate. This is a constraint to significant increases to the amount of development in the plan area if it was to be dispersed amongst the villages.

3.13 The need to protect water quality objectives downstream of wastewater treatment works (WTW) has been a significant challenge through the development of the strategy for the Chichester Local Plan. Severe environmental restrictions on increases to the capacity of the treatment works at Chichester (Apuldram) WTW mean that there is only limited scope for development within the Chichester area to drain to this works. However, investigations have demonstrated that it is technically feasible to provide additional capacity at Tangmere WTW. Southern Water has therefore included a scheme in its Business Plan (2015 to 2020 investment period) and submitted this to Ofwat, the water industry's economic regulator. The company is currently waiting for the outcome of this submission which would allow it to invest and increase capacity at Tangmere WTW. The scheme is currently sized to match the development proposed in the submission Local Plan.

3.14 The Council has produced a waste water position statement⁽¹¹⁾ which sets out the available headroom at the treatment works in the plan area. The Council has, with the Environment Agency and Southern Water, investigated the potential to accommodate wastewater treatment from additional development at the various treatment works serving development in the plan area. The results of this work are attached at Appendix 1. The only WTWs with current significant additional capacity within the existing environmental permit to accept wastewater from new development is Thornham WTW serving the Southbourne area.

3.15 However, it has been confirmed that it is technically feasible to provide wastewater treatment capacity for up to 6,000 new homes at Tangmere WTW, using the same technology as the scheme proposed in the Southern Water Business Plan. The investment required to deliver this capacity could be planned and funded through the water industry's five year price review process. Southern Water could also apply for new or amended environmental permits to provide additional capacity at the WTWs serving Pagham, Kirdford, Loxwood and Wisborough Green. Discussions with the Environment Agency and Southern Water have established that there are environmental constraints in the Lavant catchment.

3.16 There are significant environmental considerations related to the downstream discharges from all of the wastewater treatment works within the plan area. It should be noted that the amount of current available headroom at the various treatment works is variable subject to monitoring of the latest flow data. That is, the flows to the WTW are rainfall dependent and are higher in wetter years. It is therefore necessary to use an average figure over a number of years to 'smooth' this effect. However, this could mean that the current assumptions around headroom would have to be revised and could reduce or increase. There is no nationally agreed approach on calculating the available headroom for the purposes of development planning, however, through the Chichester Water Quality Group we have agreed a methodology that is supported by all key parties, including the Environment Agency and Southern Water. The approach adopted on calculating headroom is at the leading edge

3 . Constraints to Development

of water management policy nationally and has been fed in to national discussions between the water industry and the Environment Agency considering the merits of a national methodology and could be subject to change. The approach adopted is not unduly restrictive but without further monitoring of the policy and approach it would be difficult to demonstrate that higher rates of growth would not be harmful in the catchments of Bosham, Chichester, Sidlesham, and Lavant.

3.17 There may be on-site solutions that do not require connection to the public treatment facilities. However, developers will have to prove to the Environment Agency that these are acceptable on a case by case basis in order to be granted a permit to discharge. The Council would find it difficult to base a development strategy on the assumption that on-site solutions are environmentally acceptable; given the need to demonstrate that the plan is deliverable. Questions remain about the long-term sustainability of these small scale private treatments works, particularly with regard to maintenance and monitoring of environmental impacts.

3.18 The challenges highlighted above, combined with other considerations such as protection of landscape, historic environment, flood risk, etc, means that there is considerable uncertainty about whether it would be possible to deliver significantly more development than that proposed currently in the Plan whilst at the same time protecting water quality objectives.

3.19 Through the sequential test⁽¹²⁾ the Plan has identified land for development that is outside of the tidal and fluvial flood plains. The Council considers that it should be possible to provide for development identified in the parish housing numbers without encroaching on tidal and fluvial flood plains. However, it should be noted that, although difficult to quantify, the south of the plan area is susceptible to surface water and groundwater flooding⁽¹³⁾. Much of the coastal plain is very close to/below sea level and the water table can be close to or at ground level through much of the winter. The East/West corridor runs to the south of the South Downs and springs appear when the chalk aquifer fills up. These events can be unpredictable. There are constant reports of land drainage problems on the Manhood peninsula in wet weather. Residents from the Manhood peninsula and the Southbourne area often complain about the foul drainage system being unable to cope with flood water containing raw sewage encroaching on to gardens and residents being unable to flush toilets for significant periods of time.

3.20 The Council considers that the amount of development proposed in the Plan can be delivered without being at risk of flooding⁽¹⁴⁾. However, should significant increases in the amount of development be proposed, it would be difficult to demonstrate that the development would not be at risk of surface water or ground water flooding.

3.21 Much of the south of the plan area is in close proximity to areas designated as being internationally important for nature conservation (Chichester Harbour, Pagham Harbour and (effectively) the Medmerry realignment). The Council believes that it has put in place appropriate mitigation measures to allow development to proceed without it having an adverse

12 [National Planning Policy Framework para 100-104](#)

13 [West Sussex Local Flood Risk Management Strategy](#)

14 [Strategic Flood Risk Assessment \(2008\)](#)

3 . Constraints to Development

impact on the integrity of the designated sites. The cumulative impact of development has been assessed in conjunction with the other local planning authorities in close proximity to the Solent (including Portsmouth, Langstone and Chichester Harbours).

3.22 Compared to some of the other more densely populated areas in South Hampshire, there are fairly modest proposals for development in the areas surrounding Chichester Harbour. This should be seen in the context of assimilating new development within a rural, relatively undisturbed environment rather than a busy urban environment, often with other existing environmental issues. On sites in close proximity to the designated areas, development may have to deliver bespoke solutions, in addition to the strategic mitigation measures, to ensure it can be demonstrated there is no harm to protected habitats and species.

3.23 The Council has agreed with its partners in the Solent Disturbance and Mitigation Project that the impact of the current proposals for housing in the Local Plan can be mitigated to ensure compliance with the Habitat Regulations. However, notwithstanding the cumulative mitigation solution, a significant increase in housing provision could prove to be undeliverable due to the need to allocate land that is designated as a feeding area for Brent Geese.

3.24 The Environment Agency assesses the environmental impact of wastewater treatment works separately from the planning process, through a system of permits, monitoring and enforcement. There is already pressure on protected habitats from sea level rise and recreational disturbance. Increased amounts of development could also have an impact on wastewater treatment works that discharge in to Chichester and Langstone Harbour that would require costly mitigation solutions. The amount of current headroom within existing wastewater treatment works is uncertain and dependent upon monitoring and potential enforcement.

3.25 In considering whether there is scope to accommodate more residential development within the plan area in proximity to the internationally designated habitats, the need to avoid harm rather than mitigate is relevant⁽¹⁵⁾.

3.26 The Council has assessed the transport implications of the development proposed in the Local Plan in conjunction with West Sussex County Council and the Highways Agency. The evidence base demonstrates that the proposed development will have an impact on the road network but that this can be mitigated⁽¹⁶⁾. There are significant constraints around the A27 with peak hour and holiday related congestion and capacity issues. The main settlements on the Manhood peninsular (Selsey and East Wittering/Bracklesham) both rely on a single main road for access, with significant congestion and journey time reliability problems, particularly at the junctions with the A27.

3.27 The Council considers that the choice of the strategic development locations in the Plan reflects the most sustainable option for locating development in terms of travel distances (thereby minimising the need for travel and providing more opportunities for walking and cycling) and the availability of public transport.

15 [Habitat Regulations](#)

16 [Transport Study of Strategic Development Options and Sustainable Transport Measures \(March 2013\)](#)

3 . Constraints to Development

3.28 Whilst the north of the plan area does not suffer from the same road capacity and congestion problems as the south it is a relatively remote rural area. The nearest main settlements, Haslemere in Waverley Borough and Billingshurst in Horsham District are some distance and only realistically accessible with a private car.

3.29 Much of the coastal plain consists of best and most versatile agricultural land. The strategic development locations identified in the Plan are mainly on high grade agricultural land and it is likely that the land identified through neighbourhood plans in parishes in the south of the plan area will be on high grade agricultural land. Whilst not an absolute constraint to development, any significant increase in residential development would be likely to lead to further losses of high grade agricultural land.

4 . Mitigation to Constraints

4.1 The Council has sought to overcome a number of constraints to development and the proposed Local Plan strategy relies on a series of mitigation measures to ensure that development is sustainable and meets the requirements of the NPPF. Whilst the Council believes that the mitigation measures that form part of the plan strategy are deliverable, increases to the amount of development proposed in the Plan cannot necessarily be achieved by extending or expanding the same mitigation measures. Substantial increases in the amount of proposed development may well need revisions or additions to the evidence base and the resulting mitigation measures may be substantially different with a different strategy. This would be dependent on the scale and location of increases in development.

4.2 The Council has sought to minimise the impact on the landscape in its choice of strategic development locations. However, there will be an impact on the landscape and this is unavoidable given the fact that parts of the countryside will be built upon.

4.3 The built form of the city of Chichester is relatively unobtrusive in the landscape. Whilst the city can be seen from the surrounding countryside, including higher vantage points within the National Park (such as Kingley Vale and the Trundle), this is mainly due to the presence of the cathedral spire. The buildings within the rest of the city are generally low-rise and screened from long distance views by a substantial tree cover. The Council will promote extensive planting within the new development sites. This will be particularly important for the sites at Tangmere, Westhampnett/NE Chichester and West of Chichester, given the scale of development proposed and the proximity to the National Park. However, it has to be acknowledged that new planting will take time to mature, notwithstanding the priority on utilising existing mature trees and hedge lines within the masterplans for the strategic sites.

4.4 The Westhampnett/NE Chichester site is extremely close to the border with the South Downs National Park and the SDNP Authority has expressed concerns over any potential increase in housing in this location.

4.5 The Council will protect the historic environment from the potential effects of new development⁽¹⁾. The policy and supporting text for the West of Chichester site identifies specific requirements with respect to the views of the cathedral spire and the setting of the Chichester Entrenchments Scheduled Monument. With respect to the latter point and in responding to views expressed through consultation, the Council has proposed that the land north of the B2178 is kept free from development.

4.6 The Local Plan policy allocating land at Westhampnett/NE Chichester includes specific requirements in relation to the views of the cathedral spire and the setting of the Graylingwell Hospital Conservation Area. Similarly the policy for Tangmere includes reference to the views of the cathedral spire and the heritage and potential archaeological interest of the village and its surrounding area.

4.7 The Council has worked extensively with partners in the Environment Agency, Southern Water, Natural England, West Sussex County Council and the Chichester Harbour Conservancy to provide solutions to mitigate environmental water quality constraints and ensure that wastewater infrastructure can be delivered. Southern Water has invested some

1 [NPPF Section 12 Conserving and enhancing the historic environment](#)

4 . Mitigation to Constraints

£2m in upgrading the storm water discharge at Chichester (Apuldram) WTW and is carrying out further work into investigating and seeking to prevent infiltration into the sewerage network. This has generated some immediate headroom, most of which is accounted for.

4.8 Southern Water has also submitted (as part of its 2015 to 2020 Business Plan) to Ofwat a scheme to invest substantial funds to increase the capacity of Tangmere WTW. Ofwat generally agrees to fund investment required to serve new development, provided there is planning certainty to support the proposals. Although unlikely, if the submission is unsuccessful, the delivery of the development proposed for the strategic development locations around Chichester would have to be re-evaluated.

4.9 Significant increases to the amount of development proposed in the plan would need additional investment to deliver further wastewater treatment capacity. This could be planned and funded through the water industry's five year price review process. Whilst developers are proposing on-site solutions, the Council does not believe that it could put forward a development strategy based on these solutions, as it cannot demonstrate to the Environment Agency that they are deliverable in environmental terms, nor sustainable in the long term.

4.10 The mitigation of potential flood risks will be dealt with as part of the masterplanning and planning application process including the application of the sequential test. Where necessary, Flood Risk Assessments will be required to form part of planning applications for residential development.

4.11 The Council has collaborated with other local authorities around the Solent to produce a strategic solution to constraints around the internationally designated sites. The Council will ensure that any issues, including potential impacts on local and national designations, within the strategic development locations are given priority in the masterplanning of those sites. In particular, the policy for the West of Chichester site includes a requirement to protect and enhance the existing biodiversity and ecological corridor linking Chichester Harbour and the South Downs National Park.

4.12 The Strategic Transport Study developed a package of measures aimed at mitigating the traffic impacts associated with proposed development⁽²⁾. These measures were tested against two development scenarios, the first where development was constrained to the South East Plan housing target of 355 homes/year in the south of Plan area, and the second testing 440 homes/year in the south of Plan area, with this figure based on maximising housing potential at the proposed strategic development locations. In addition, a final run was undertaken later based on the housing distribution proposed in the draft Local Plan Preferred Approach document (395 homes/year in the south of Plan area).

4.13 This Study work led to the development of the Chichester City Transport Strategy, an integrated package comprising targeted highways improvements, demand management and 'Smarter Choices' which is central to delivering the Local Plan strategy.

4.14 A major element of the overall transport strategy is a package of proposed improvements to the six junctions on the A27 Chichester Bypass, aimed at improving traffic capacity, reducing congestion and queueing, and addressing road safety issues.

2 [Transport Study of Strategic Development Options and Sustainable Transport Measures \(March 2013\)](#)

4 . Mitigation to Constraints

4.15 In addition, the County Council has developed a Strategic Infrastructure Package, including proposed transport improvements which aim to reduce congestion and encourage people to use sustainable modes of travel such as walking, cycling and public transport. A key objective will be to achieve a significant shift in travel behaviour aimed particularly at reducing car use for short distance journeys, with an overall objective of achieving a 7% reduction in forecast car travel in and around the City. This will involve targeted investment in local transport infrastructure, focusing on delivery of improved and better integrated bus and train services, and improved pedestrian and cycling networks. Allied to this will be measures to encourage behavioural change, such as easy-to-use journey planning tools, skills training and promotional activities. Parking policies for the city included in the Chichester District Car Park Strategy 2010-2020 will also play a role in managing growth in car use.

4.16 These proposed improvements to transport infrastructure, coupled with the measures to control travel demand and promote sustainable modes of travel, are considered sufficient to accommodate the levels of development proposed in the Local Plan. Both the Highways Agency and West Sussex County Council have published Position Statements stating that they are satisfied that the transport infrastructure measures would provide sufficient mitigation to ensure that the residual cumulative impacts of the development proposed in the Local Plan would not be severe (thereby meeting the key test set out in the NPPF⁽³⁾).

4.17 However, the effectiveness of these measures is critically dependent on ensuring a coordinated and comprehensive approach to delivery and phasing linked to development. It was intended that the transport improvements were funded from development contributions, however the cost of the complete package of measures for the A27 junctions and local transport measures in the City is substantial (in the region of £20 million).

4.18 The A27 has trunk road status and falls under the responsibility of the Highways Agency. Proposals for improvements to the six A27 junctions on the Chichester Bypass and the surrounding road network have been under consideration for many years. In June 2013, the Government Spending Review identified the A27 at Chichester in a list of schemes for future capital investment. The A27 Chichester improvements are now included in the Highways Agency's work programme for the period 2015-2019. The Agency is currently undertaking preparatory scoping work which is due to be completed in April 2014. This will include preparation of the business case (to confirm value for money and deliverability) and will outline the timetable for planning and implementing the scheme.

4.19 The programmed improvements to the A27 at Chichester could help to increase the potential of the Plan area to accommodate housing in the longer term. However, at present there is considerable uncertainty with regard to both the scale and nature of the proposed improvements and their timing. For this reason, it has not been possible to base the Local Plan strategy on improvements to the A27 other than measures that could potentially be funded by development. As noted previously, such measures are aimed at mitigating specific traffic impacts directly related to proposed new development and do not address longer term problems resulting from forecast growth in traffic. However, it is recognised that there is a need to coordinate the Local Plan transport measures with the proposed improvements to the A27 when these are finalised.

4 . Mitigation to Constraints

4.20 Planning policies ensure new development is not subject to adverse noise impacts⁽⁴⁾. There are particular issues around the Westhampnett/NE Chichester site and the noise generated at Goodwood Motor Racing Circuit and Airfield. There is a requirement in the policy allocating the site that development is designed to reduce the impact of noise. However, the Council is concerned that this should not be at the cost of attractive and high quality design and therefore whilst this constraint can be overcome with the level of development currently proposed, any increase in the amount of development in proximity to Goodwood should not result in a design overwhelmingly dominated by the need to design out adverse noise impacts.

5 . Delivery of Development

5.1 One of the key tests of soundness is that the Plan is effective⁽¹⁾ and that the development proposed is deliverable. The Council considers that the Plan is positively prepared and that the rates of development proposed are deliverable and this is supported by the development industry in responses to consultation. However, the Council would question whether significant increases over the rates proposed would be deliverable within the local market. The amount of housing development proposed represents a significant increase in the amount delivered in recent times as can be seen from the analysis in the Table Net Annual Housing Completions since 2001.

5.2 Housing completions for Chichester District over the period 2001-2013 have averaged around 410 net dwellings per year (Table 1). This disaggregates to an average of 346 net dwellings/year in the Plan area and 64 net dwellings/year in the National Park.

5.3 Over the period 2006-2013, housing completions for the District have fallen slightly to 400 net dwellings per year. The geographical balance has also shifted slightly as completions in the Plan area fell to 329 dwellings/year, whereas the National Park figure increased to 71 dwellings/year.

5.4 Although completion rates have varied from year to year over the past decade, the figures indicate that average net completions have generally fallen since 2008/09, reflecting the impact of the economic recession on the housing market. It should also be noted that the average level of housing delivery has been significantly below the targets previously set in the South East Plan (480 net dwellings a year) and the West Sussex Structure Plan (equivalent to 474 net dwellings a year), although these targets has been exceeded in some individual years.

Net Annual Housing Completions since 2001⁽¹⁾

Year	Chichester District	South of Plan area	North of Plan area	Plan area total	South Downs NP
2001-02	461	385	31	416	45
2002-03	260	188	20	208	52
2003-04	467	459	14	473	-6
2004-05	457	346	21	367	90
2005-06	482	345	48	393	89
2006-07	366	272	6	278	88
2007-08	439	298	4	302	137
2008-09	593	443	38	481	112
2009-10	320	265	15	280	41

1 [National Planning Policy Framework para 182](#)

5 . Delivery of Development

2010-11	429	313	32	345	84
2011-12	353	295	16	311	42
2012-13	299	307	0	307	-8
Ave 2001-2013	410	326	20	346	64
Ave 2006-2013	400	313	16	329	71

1. Source: West Sussex County Council Housing Development Monitoring Surveys

5.5 Delivery on the strategic sites is projected to commence from 2019 when the work to increase the capacity of the Tangmere Wastewater Treatment Works is completed. The Council has assumed that the Tangmere and West of Chichester sites will each deliver 100 homes per year from this point. This is a fairly optimistic assumption and it is unlikely that delivery rates could be increased, particularly when averaged over the subsequent 10 year period.

6 . Conclusion

6.1 The Council has carried out extensive consultation and prepared a Local Plan that promotes a strategy that will increase the rate of residential development, whilst providing the environmental protection to ensure that the outstanding qualities of the area are not compromised.

6.2 It should be noted that the rate of growth in the Plan is substantial in the context of the area within which it will occur. The city of Chichester and adjoining built up area is likely to see nearly 3,500 dwellings over a 15 year period. This equates to at least an extra 8,000 residents or a 25% expansion of the city. Tangmere will double in size.

6.3 This has been a difficult journey and, as can be seen from the representations, there is much opposition to new development from the existing population. However, there are strong indications that development sites are being identified through the neighbourhood planning process and progress is being made with the promoters of the strategic development locations to bring them forward.

6.4 The Council has overcome significant constraints to development, particularly around wastewater treatment and highways infrastructure. The evidence base supporting the Local Plan demonstrates that the constraints for the amount of development in the Plan can be mitigated. Any significant increase in the amount of development in the plan area would require a re-evaluation of the evidence base to ensure that development would be deliverable and sustainable.

Appendix A . Wastewater treatment provision in the District

A.1 This appendix has been produced jointly with Chichester District Council, the Environment Agency and Southern Water. It provides the latest information on the WTW in the District following the initial MWH Study commissioned by the Council in 2010.

A.2 Since the Habitats Directive came into force in 1992 the Environment Agency have reviewed existing permissions, including Environmental Permits from wastewater treatment works, to ensure that they protect habitats and species of European importance. This review included the wastewater treatment works that discharge in to Chichester Harbour. The Local Plan does not need to consider this again through a Habitats Regulation Assessment as long as the planned housing numbers can be accommodated within the current permit.

Apuldram WTW

A.3 A detailed assessment is not included within this appendix of Apuldram WTW. The existing headroom available is limited and has been allocated to parish housing numbers contained within the Chichester Local Plan: Key Policies 2014-2029 Policy 5. The Council has produced a Position Statement which provides more detail on the Apuldram WTW⁽¹⁾.

Tangmere WTW

A.4 Southern Water state that there is headroom in the current Environmental Permit at Tangmere WTW for 800 new homes (base date July 2012). The company is informed by the planning authority that this headroom is fully taken up by development with planning permission.

Upgrade of works - an investment scheme has been included in the company's Business Plan to provide additional wastewater treatment capacity by 2019. This scheme is based on the level of development set out in the emerging Local Plan. The Environmental Permit associated with the scheme is expected to provide capacity for 3,000 new homes. Southern Water has also confirmed that it is technically feasible to provide wastewater treatment capacity for up to 6,000 new homes at Tangmere WTW, using the same technology as the scheme proposed in the Business Plan. This assumes that the Environment Agency would apply the same Water Framework Directive objective as for the scheme currently included in the Business Plan.

Environment - the tighter Permit limits and upgrade to the treatment works proposed by Southern Water will ensure that there is no deterioration in water quality status under the Water Framework Directive.

Thornham WTW

A.5 Increase housing numbers to use estimated available headroom of 1,700.

Upgrade of works - the MWH study explains that these works are close to the loading limit after the reduction of the Total N consent from 15mg/l to 10mg/l which would necessitate an upgrade to the works to meet the stricter treatment standard and allow for new development. Southern Water has confirmed that the scheme will be delivered by the end of March 2015.

1 [Wastewater Position Statement – Chichester District Council](#)

Appendix A . Wastewater treatment provision in the District

The existing Permit for the works will change in March 2015. Southern Water state that there is headroom in the current Environmental Permit at Thornham WTW for 1,700 new homes (base date July 2012).

Environment - The Thornham Wastewater Treatment Works discharges in to Chichester Harbour. The future Permit will operate with a Total N limit at the current accepted Best Available Technology of 10 mg/l. Whilst there are no environmental concerns in using the remaining headroom in the existing permit there is limited scope for upgrading due to the environmental sensitivity of the receiving waters.

A.6 Serious concerns have been raised by the community of Southbourne regarding the operation of the sewerage network that conveys wastewater to Thornham WwTW, however, it is currently considered that this has been consistent with the significant rainfall events affecting the catchment over the last two years.

A.7 The Environment Agency will continue to monitor the compliance of the Thornham WTW.

Bosham WTW

A.8 Increase housing numbers to use estimated available headroom of 397.

Upgrade of works - the MWH study a modification to the works is programmed in AMP5 to achieve a reduction from 15mg/l to 10mg/l. This will accommodate new development. Southern Water has confirmed that the scheme will be delivered by the end of March 2015. An upgrade would be required to go beyond the existing permit headroom. Southern Water state that there is headroom in the current environmental permit at Bosham WTW for 300 new homes (base date July 2012).

Environment - The Bosham Wastewater Treatment Works discharges in to Chichester Harbour. The future Permit will operate with a Total N limit at the current accepted Best Available Technology of 10mg/l. Whilst there are no environmental concerns in using the remaining headroom in the existing permit there is limited scope for upgrading due to the environmental sensitivity of the receiving waters.

Lavant WTW

A.9 West of Chichester or increase in housing numbers to use the estimated available headroom of 1,900 or utilise some of the estimated available headroom?

Upgrade of works - The MWH study states that the current pollutant consents at Lavant offer a significant opportunity for increasing flow to the works. However, the quality of the receiving water is of concern to the EA and hence it is anticipated that the works would be the subject of a quality improvement scheme in the near future.

A.10 Southern Water state that the Lavant catchment suffers from surface water and groundwater infiltration, similar to the Chichester (Apuldram) catchment. This compromises the sewerage system in wet weather and when the water table is high. The company has an infiltration reduction plan in place. The efficacy of interventions is not yet certain.

Appendix A . Wastewater treatment provision in the District

Environment - both the quality of the receiving water and the impact of the surface water and groundwater infiltration is of concern to the Environment Agency. The Lavant WTW discharges in to the River Lavant which in turn discharges in to Chichester Harbour. As such it is likely that the Environment Agency would resist a significant increase in population served by this wastewater treatment works. It is possible that the works will be subject to a quality improvement scheme in the near future which could reduce permit headroom.

Sidlesham WTW

A.11 Increase the housing numbers to use the estimated available headroom of 1,000.

Upgrade of works - the MWH Study states the works capacity is stretched and although there is scope for additional treatment, an upgrade would be needed to allow the full identified DWF headroom to be used. Southern Water state that there is headroom in the current Environmental Permit at Sidlesham WTW for 1,000 new homes (base date July 2012).

Environment - the current Permit at Sidlesham contains a Phosphorus limit at the current accepted Best Available Technology of 1mg/l. In addition the Environment Agency is considering the potential impact of the total Nitrogen discharged from the WwTW on Pagham Harbour. It is possible that a quality improvement scheme may be introduced in the future to address this. There is therefore limited opportunity to increase the capacity beyond the existing permit.

Wisborough Green WTW

A.12 There is limited development proposed for the North of the Plan area (200), there is potential to increase the housing numbers in Wisborough Green to use the estimated available headroom of 200.

Upgrade of works – the MWH study did not assess the treatment works. There is scope for redeveloping the WTW and it is unlikely that it is completely constrained; however, an assessment would need to be undertaken. Southern Water state that there is headroom in the current Environmental Permit at Wisborough Green WTW for 200 new homes (base date July 2012), and that further capacity could be provided, subject to a new or amended Environmental Permit from the Environment Agency.

Environment - there may be scope to increase the capacity as long as it can be demonstrated that there will be no deterioration from the current water quality status in the receiving water.

Chichester District Council



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