

**Chichester Local Plan Examination  
Statement of Common Ground  
Chichester District Council and Natural England**

**1. Background**

- 1.1 The Natural England (NE) response of 6<sup>th</sup> January 2014 to the Chichester Local Plan: Key Policies Pre-submission and Habitats Regulations Assessment (HRA), drew attention to just two issues:
- **Issue 1** – “Paragraph 4.5.7 recognises (via the text from policies 15, 20 and 24) the need for onsite mitigation; but I can see no indication of the nature and scale of provision necessary to meet the demands for recreational space arising from each development (that would otherwise result in use of the SPA) or the feasibility of on-site provision”.
  - **Issue 2** – “I am concerned about paragraph 4.5.31 of the HRA and the conclusion that modelling predicts that nitrogen deposition is expected to exceed critical load. If this effect cannot be screened out (say on grounds of the limited scale traffic growth), then further modelling should be undertaken to clarify the likely effects and allow appropriate avoidance or mitigation to be specified. At the moment (to address this likely significant effect) the HRA relies on policies that may deliver reduction in car use - but there is no detail on what actions are to be taken and what funding is required - nor is there evidence of the possible effectiveness of these measures”.

Note - the HRA was subsequently amended and republished.

**2. Common Ground**

**Issue 1**

- 2.1 A number of conversations in August 2014, clarified the provision made in the Chichester Local Plan: Key Policies to address this issue, including policy wording and concept statements/masterplans for the strategic development locations that demonstrated significant provision of open space and Green Infrastructure on the key development sites.
- 2.2 On this basis, the “further detail and clarification” sought in the Natural England response of 6<sup>th</sup> January 2014 has been provided and the plan is considered sound.

**Issue 2**

- 2.3 There are two groups of sites that require clarification:
- The Mens SAC, the Ebernoe Common SAC and the Duncton & Bignor Escarpment SAC
  - Chichester and Langstone Harbours SPA/Ramsar
- 2.4 In the case of the Mens, Ebernoe, and Duncton & Bignor Escarpment SACs, the HRA with subsequent submissions and conversations, have indicated that:
- The designated habitats are some 11 to 21km from the main focus of development in the southern part of Chichester District (some 6,634 dwellings).
  - Development in the southern part of the plan area is around the A27 which is the main east/west commuter route.
  - Development in the northern part of the plan area is limited (some 339 dwellings) and dispersed and delivered through various Neighbourhood Plans.

- The consultants commissioned by the District Council to undertake the HRA, conclude that (as a result) it is unlikely that traffic close to the designated sites will grow by 1,000AADT

2.5 On this basis, the "further detail and clarification" sought in the Natural England response of 6<sup>th</sup> January 2014 has been provided and the plan is considered sound in respect of nitrogen deposition and the three SACs.

2.6 In the case of Chichester and Langstone Harbours SPA/Ramsar and the Solent Maritime SAC, the HRA with subsequent submissions and conversations, have indicated that:

- The traffic flow and air quality/deposition analysis used for the HRA was based on the AEA work of 2010, which considered higher levels of development than have come through in local plans.
- The current nitrogen load on the A27, which runs across the north of Langstone Harbour, is 27KgN/Ha/Year, and is above the lower critical load (20KgN/Ha/Year) for the adjoining habitat, but below the upper critical load (30KgN/Ha/Year)
- Development in the PUSH area is expected to add a further 1KgN/Ha/Year, based on the development of some 80,000 additional dwellings.
- The Havant Local Plan and HRA (now adopted) makes provision for a range of measures including Green Infrastructure and traffic management to address the effects of development in terms of Nitrogen deposition.
- The Chichester Local Plan: Key Policies and the HRA are taking a similar policy approach, and officers are in discussions with Havant (under the Duty to Cooperate) and others, to monitor AQ issues - and if appropriate, will make proportionate contributions to joint action (in line with para 4.5.26 of the HRA).
- Based on the Havant analysis, the development in Chichester District (excluding the area within the South Downs National Park) of some 6,634 dwellings in the southern part of the plan area served by the A27, may generate less than 0.083KgN/Ha/Year  $((6,634 / 80,000) \times 1\text{Kg})$ . This worst case indicates a Process Contribution of some 0.3%  $((0.083 / 27) \times 100)$ . As a result, the contribution to Nitrogen deposition arising from traffic from development in Chichester, on the Langstone Harbour is less than 1% and therefore de minimus. Traffic data provided by West Sussex County Council (appended) supports this conclusion.

2.7 On this basis, the "further detail and clarification" sought in the Natural England response of 6<sup>th</sup> January 2014 has been provided and the plan is considered sound in respect of nitrogen deposition on designated habitats along the A27.



Signed:(Natural England)

Dated: 23/9/14



Signed:(Chichester District Council)

Dated: 25/9/14

## Appendix

West Sussex County Council has prepared the following information to identify the change in A27 traffic flows associated with development in the Chichester Local Plan: Key Policies for the Langstone Harbour area. The analysis has been undertaken for both the AM and PM peaks. The data also includes the combined peaks to provide an overall average change in flows. The figures in the far right hand column have been highlighted, as these show the change in flows originating from Local Plan development. These figures have been generated from the CATM Saturn files based on the preferred Local Plan development scenario (PF) with the West of Chichester link road (LR) included.

### Caveats:

1. The route choice for longer distance traffic is constrained by the edge of the model. This means that it will not show the effects of any re-routing for longer distance traffic that originates in West Sussex, but travels further west than Havant. This in effect means that we have a 'worst case' here.
2. 'Flows west of the 'A3023' shown will exclude traffic that does not enter West Sussex.

Change in Flow A27 by Langstone Harbour									
AM Peak									
		Scenario			Change		% Change		
Road Section	Direction	2009 Base	2031 Baseline	2031 Local Plan (PF+LR)	2031 Baseline - 2009 Base	2031 Local Plan (PF+LR) - 2031 Baseline	2031 Baseline - 2009 Base	2031 Local Plan (PF+LR) - 2031 Baseline	
East of A3023 / B2149	Eastbound	2506	3145	3213	639	68	25%	2.2%	
	Westbound	2815	3474	3474	659	0	23%	0.0%	
	Two-Way	5321	6619	6687	1298	68	24%	1.0%	
West of A3023 / B2149	Eastbound	1774	2190	2188	416	-2	23%	-0.1%	
	Westbound	2025	2494	2493	469	-1	23%	0.0%	
	Two-Way	3799	4684	4681	885	-3	23%	-0.1%	

Change in Flow A27 by Langstone Harbour									
PM Peak									
		Scenario			Change		% Change		
Road Section	Direction	2009 Base	2031 Baseline	2031 Local Plan (PF+LR)	2031 Baseline - 2009 Base	2031 Local Plan (PF+LR) - 2031 Baseline	2031 Baseline - 2009 Base	2031 Local Plan (PF+LR) - 2031 Baseline	
East of A3023 / B2149	Eastbound	2712	3390	3373	678	-17	25%	-0.5%	
	Westbound	2931	3702	3684	771	-18	26%	-0.5%	
	Two-Way	5643	7092	7057	1449	-35	26%	-0.5%	
West of A3023 / B2149	Eastbound	1991	2492	2482	501	-10	25%	-0.4%	
	Westbound	1734	2158	2140	424	-18	24%	-0.8%	
	Two-Way	3725	4650	4622	925	-28	25%	-0.6%	

Change in Flow A27 by Langstone Harbour									
Combined Peaks									
		Scenario			Change		% Change		
Road Section	Direction	2009 Base	2031 Baseline	2031 Local Plan (PF+LR)	2031 Baseline - 2009 Base	2031 Local Plan (PF+LR) - 2031 Baseline	2031 Baseline - 2009 Base	2031 Local Plan (PF+LR) - 2031 Baseline	
East of A3023 / B2149	Eastbound	5218	6535	6586	1317	51	25%	0.8%	
	Westbound	5746	7176	7158	1430	-18	25%	-0.3%	
	Two-Way	10964	13711	13744	2747	33	25%	0.2%	
West of A3023 / B2149	Eastbound	3765	4682	4670	917	-12	24%	-0.3%	
	Westbound	3759	4652	4633	893	-19	24%	-0.4%	
	Two-Way	7524	9334	9303	1810	-31	24%	-0.3%	