

# West Wittering Neighbourhood Plan 2019 – 2029

## Background Evidence Paper

Submission Version

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## **1.0 Introduction**

- 1.1 This Paper has been produced to summarise the background evidence that sits behind the West Wittering Neighbourhood Plan. This enables the Plan itself to be a more concise and useable document whilst being clear that it is based on a proportionate and robust evidence base.
- 1.2 The following topics are covered by this paper:
- The Manhood Peninsula and the Witterings
  - Local Plan Background and Housing Provision
  - Housing Mix and Affordability
  - Landscape
  - Climate Change, Biodiversity and Water and Wastewater
  - Transport

## **2.0 The Manhood Peninsula and the Witterings**

- 2.1 The Manhood Peninsula is located to the south of Chichester and is bracketed by Chichester Harbour to the west and Pagham Harbour to the east, with its southern headland being Selsey Bill. It is one of the last relatively undeveloped stretches of coastline between Newhaven and Southampton. Forming part of the coastal plain south of Chichester it is semi-rural, open and flat, much of it less than 5m above sea level and at risk from flooding, both inland and coastal.
- 2.2 The parish of West Wittering is located on the coast at the Chichester Harbour end of the Peninsula with its neighbouring parishes of East Wittering and Bracklesham and Earnley to the east and West Itchenor and Birdham to the north.
- 2.3 Chichester Harbour is designated as an Area of Outstanding Natural Beauty and both Chichester and Pagham harbours are recognised internationally as protected areas under the Conservation of Habitats and Species Regulations. The coastline between Chichester Harbour and Selsey Bill is a Site of Special Scientific Interest. These wildlife assets and other coastal benefits make this an attractive area for visitors, such that there is a significant difference in population and levels of activity between winter and summer. The large number of second homes and holiday lets in the area means that the population of West Wittering significantly increases during the summer as does demand on all utilities, roads and transport and the impact on the protected areas.
- 2.4 The geography of the Peninsula is key to how it is used by people today. Road access can only be gained via a small number of long north-south routes which intersect with the A27 running east-west along the top of the Peninsula. Visitor numbers in the summer often result in long queues along these roads as people seek to access the beaches. Water drains naturally to the two harbours either

side and wastewater treatment facilities have to be located close to these watercourses. The impact of the outflows on the water quality of the harbours has a significant impact on their function as wildlife habitats.

### **3.0 Local Plan Background and Housing Provision**

- 3.1 The Adopted Chichester Local Plan designates West Wittering as a 'Service Village' within Policy 2 'Development Strategy and Settlement Hierarchy'. This policy states that the Service Villages will provide for the following:
- Small scale housing developments consistent with the indicative housing numbers set out in Policy 5 'Parish Housing Sites 2012-2029', stated as 50 dwellings for West Wittering;
  - Local community facilities, including village shops that meet identified needs within the village, neighbouring villages and surrounding smaller communities, which will help make the settlement more self-sufficient; and
  - Small scale employment, tourism and leisure proposals.
- 3.2 A 'Site Allocations Development Plan Document' (DPD) was prepared to help deliver the housing and employment numbers within the Local Plan. Table 1.1 within the DPD confirms that the housing target of 50 dwellings for West Wittering would be achieved through extant planning permissions. Therefore, the DPD did not propose any additional allocations within the Neighbourhood Plan area. These extant planning permissions have since been built out (primarily at Sandpipers Walk, Church Road in the east of the parish).
- 3.8 Chichester District Council is in the process of undertaking a review of the Local Plan. The Preferred Approach version of the Chichester Local Plan Review (2016-2035) was published for Regulation 18 Consultation between December 2018 and February 2019. Within that document, Policy S2 'Settlement Hierarchy' also lists West Wittering as a 'Service Village', with Policy S5 'Parish Housing Requirements 2016-2035' highlighting a new target for 25 new dwellings to be delivered over the lifetime of the Plan.
- 3.9 In this context West Wittering Neighbourhood Plan Steering Group intended to allocate a site or sites for 25 new dwellings and issued a 'call for sites' in spring 2017 and a further one in December 2018. Chichester District Council advised that a Strategic Environmental Assessment of the Neighbourhood Plan would be required and AECOM was commissioned to undertake this work.
- 3.10 Eight sites were submitted for consideration and assessments were carried out on all of these proposals. Four of these sites were part of the alternatives for achieving the potential 25 home target considered through the Strategic Environmental Assessment (SEA) for the West Wittering Neighbourhood Plan as follows:

- Option 1: Delivery of the housing number through a single allocation on Land at Church Road.
  - Option 2: Delivery of the housing number through a single allocation on Walnut Tree Caravan Site.
  - Option 3: Delivery of the housing number through a combination of allocations at Land west of Northfields and Land at Church Road.
  - Option 4: Delivery of the housing number through a combination of allocations at Land west of Northfields and Walnut Tree Caravan Site.
- 3.11 Options 1 and 3 performed most favourably against the objectives in the SEA. However, the land west of Northfields is within the Chichester Harbour AONB where national planning policy (NPPF paragraph 177) says major development should only be located in exceptional circumstances and in the national interest. One of the tests is whether the need can be met in another way, and in this case the need can be met on the land at Church Road. It was therefore considered that the allocation of the Northfield Road site would be contrary to national planning policy and would not therefore meet the basic conditions required for neighbourhood plans.
- 3.12 In February and March 2020 the Parish Council carried out a Regulation 14 consultation on the Neighbourhood Plan which included the proposed allocation of a site at Church Road for 25 homes to meet the target in the emerging Chichester Local Plan. Around that time Welbeck Homes submitted to Chichester District Council's Housing and Economic Land Availability Assessment (HELAA) a proposal for over 200 homes on land which includes the proposed allocation site. They also submitted a planning application for 78 (now 70) homes on the allocation site which was refused planning permission by Chichester District Council and then appealed (APP/L3815/W/21/3286315, 20/02491/OUT).
- 3.13 In November 2020 the Divisional Manager for Planning Policy at Chichester District Council wrote to advise parish councils of progress to date with the Local Plan Review. He highlighted issues including the capacity of the waste water treatment infrastructure which serves this area, environmental concerns including nitrates in Chichester Harbour, the need for significant investment in the A27 to mitigate the impacts of development, and the need to secure the necessary funding for infrastructure. To enable those issues to be tested further, the District Council was progressing with a revised distribution of housing and employment development (compared to that set out in the Preferred Approach Plan) to test through the evidence base. He attached a schedule setting out the proposed revised distribution being tested which showed that West Wittering was no longer being considered for further housing allocations (see correspondence at Appendix 1).
- 3.14 In the light of these changes in circumstances the Parish Council published a revised Regulation 14 Neighbourhood Plan in July 2021 which no longer sought

to allocate specific sites for new housing, but rather proposed a criteria-based policy WW3. The Neighbourhood Plan was then revised to take account of consultation responses and is due to be submitted for examination in Spring 2022.

- 3.15 One of these revisions includes the wording of WW3 concerning the location of new development in relation to settlement boundaries. During 2020/21 Chichester District Council could not demonstrate a five-year housing land supply and in response adopted an 'Interim Policy Statement for Housing' which set out the criteria for considering planning applications for housing ahead of the adoption of the new Local Plan. The version of WW3 in the July 2021 Neighbourhood Plan reflected the approach in this Interim Policy and allowed for development outside settlement boundaries. The District Council has since regained a robust housing supply and is no longer applying that Interim Policy Statement. WW3 has accordingly been amended so that the option to develop outside settlement boundaries would only apply if there are issues with the supply or delivery of housing at district level. This approach is used in the Fareham Local Plan Part 2: Development Sites and Policies, adopted June 2015, where Policy DSP40: Housing Allocations says:

*“Where it can be demonstrated that the Council does not have a five year supply of land for housing against the requirements of the Core Strategy (excluding Welborne) additional housing sites, outside the urban area boundary, may be permitted where they meet all of the following criteria:*

- i. The proposal is relative in scale to the demonstrated 5 year housing land supply shortfall;*
- ii. The proposal is sustainably located adjacent to, and well related to, the existing urban settlement boundaries, and can be well integrated with the neighbouring settlement;*
- iii. The proposal is sensitively designed to reflect the character of the neighbouring settlement and to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps*
- iv. It can be demonstrated that the proposal is deliverable in the short term; and*
- v. The proposal would not have any unacceptable environmental, amenity or traffic implications”.*

- 3.16 It is therefore considered that the submitted version of WW3 sets a clear policy for accommodating additional housing with the necessary flexibility for changing circumstances in the supply and delivery of homes at district level.

## 4.0 Housing Mix and Affordability

### Housing Mix

- 4.1 As part of the early evidence gathering work for the Neighbourhood Plan the Parish Council commissioned a West Wittering Housing Needs Assessment by AECOM (March 2018). This study noted that the sale price of dwellings in West Wittering was 35% higher than for Chichester as a whole.
- 4.2 The AECOM study's conclusions are set out in Table 2: 'Summary of factors specific to West Wittering with a potential impact on neighbourhood plan housing characteristics', pages 10-12 of the report. These include the following:

#### **Demand/need for smaller dwellings**

Evidence from the CWSS12 (Coastal West Sussex SHMA, published in November 2012) provides clear support for smaller dwellings, and may be used as the justification for developing policy in this direction".

#### **Demographic change**

The relatively low number of adults aged under 44, and the fall in families threaten to undermine the vitality and viability of the settlement. If this continues, it is likely to reduce demand for infrastructure targeted at these groups, for example primary schools, as well as businesses and services for the general population.

#### **Dwelling type**

The dominance of detached dwellings is consistent with the finding that the housing market is beyond the reach of many and there is a fundamental misalignment between the existing housing stock and the type and size of dwellings required by the community in future years.

#### **Family-sized housing**

There is a strong argument for the provision of family housing within the overall mix. The evidence assembled may be used to justify policy that seeks a balanced community in terms of age, household composition and income group.

#### **Housing for independent living for older people**

This HNA has identified a need in the Parish for:

- 10 additional conventional sheltered housing units
- 20 additional leasehold sheltered housing units
- 4 additional 'enhanced' sheltered units, split 50:50 between those for rent and those for sale
- 3 additional extra care housing units for rent
- 6 additional extra care housing units for sale
- 1 additional specialist dementia care home

There is no obligation on the Parish to satisfy the need for 44 specialist dwellings for the elderly, and they may be better provided at settlements that can provide better access to services; however, the need should be borne in mind in formulating the plan's housing policies.

- 4.3 This evidence was supplemented by two surveys of local residents:
- A survey carried out within the parish in November 2016 which found that 70% were in support of new bungalow development, 29% said that their family needed a bungalow now and 34% said their family would need a bungalow in the future.
  - A further survey carried out in December 2020 and January 2021. A total of 1400 paper survey forms were distributed by hand with the aim of reaching every household in West Wittering Parish. A total of 510 responses were received to the survey representing an approximately 36% response rate. This survey found that 33% of respondents indicated a bungalow would meet their housing needs.
- 4.4 Given the evidence on the need for accommodation for older people and the demand for bungalows in particular, the West Wittering Neighbourhood Plan includes policies that protect existing bungalows and requires new ones in future development (WW3 and WW4). The evidence on the need for smaller dwellings (1 to 2 bedrooms) also prompted the protection of such dwellings in WW4 and the requirement for a mix of housing types reflecting local needs in WW3.

### Affordable Homes

- 4.5 The AECOM Housing Needs Assessment also found that only 5.6% of West Wittering's housing stock is social rented or shared ownership compared to 15.8% in the district of Chichester. In 2018 there were 21 households on the Chichester district housing register with a local connection to West Wittering, of which 9 households were considered as having a high priority housing need.
- 4.6 AECOM advised that there was no basis on which to seek a different proportion of affordable housing from new residential development coming forward over the Plan period than Policy 34 of CLP (30%). However, given that the waiting list may under-report need and the conclusions in the study relating to affordability of housing to those on low incomes, the Parish Council should adopt an assertive attitude regarding the delivery of affordable housing.
- 4.7 In response to the 'call for sites' land was put forward at Rookwood Road, West Wittering by the Churches Land Trust for approximately 15 rented affordable homes for people with a local connection to West Wittering. The Churches Trust has stated that it was open to working with a Community Land Trust or other appropriate organisation to deliver these homes. Such an organisation should

comply with the Homes England definition of community led housing that “proposals should ensure that:

- meaningful community engagement and consent occurs throughout the development process. The community does not necessarily have to initiate and manage the process, or build the homes themselves, though some may do;
- the local community group or organisation owns, manages or stewards the homes and in a manner of their choosing, and this may be done through a mutually supported arrangement with a Registered Provider that owns the freehold or leasehold for the property; and
- the benefits to the local area and/or specified community must be clearly defined and legally protected in perpetuity”.

4.8 The site proposed at Rookwood Road was included in the first Regulation 14 Neighbourhood Plan as a site for 100% affordable housing. A number of objections were received from local people concerned about the suitability of the site. Chichester District Council also objected on the basis that the site did not need to be allocated and should be brought forward through Policy 35 of the adopted Chichester Local Plan or policy DM4 of the emerging Local Plan which allow for exception sites outside settlement boundaries to provide 100% affordable housing where local housing need is evidenced.

4.9 The housing allocations in the first Regulation 14 Neighbourhood Plan were omitted from subsequent versions including the affordable housing site at Rookwood Road. However, the Parish Council will work with any willing landowner and/or provider, to secure the delivery of affordable homes to meet local needs on appropriate sites that comply with the rural exception site policies. The Plan also includes a provision in WW3 that the 30% affordable housing component shall be delivered via a Community Land Trust or similar organisation that will deliver homes at a rent that local people / key workers can afford, and is subject to an appropriate planning obligation to ensure that the housing will be retained in perpetuity as affordable housing with a preference for households with a local connection. It also includes Community Aspiration 3 – To facilitate a Community Land Trust or similar organisation to take forward a proposal for affordable housing to meet local needs.

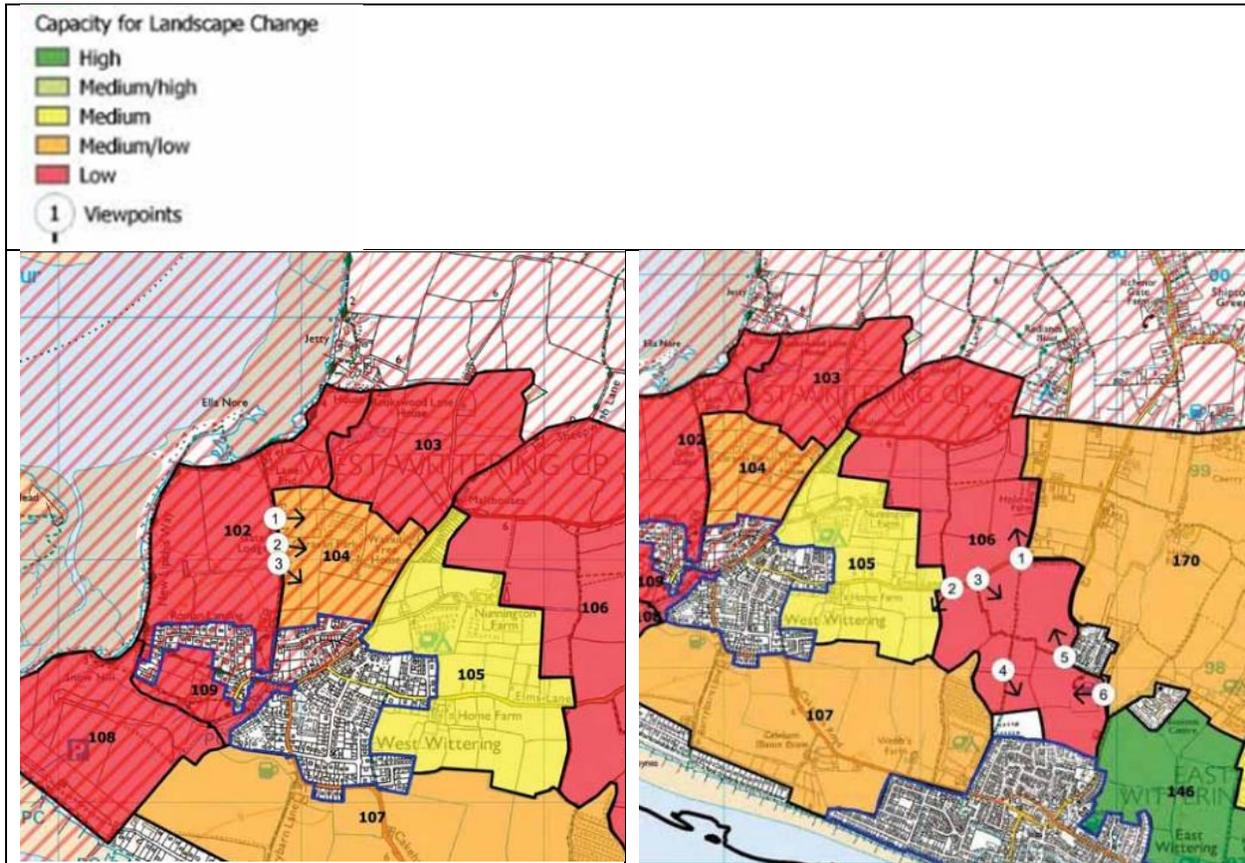
4.10 The support for Community Land Trusts is because these organisations generally deliver housing that is significantly below market price or rent (typically 50%). The AECOM study identified that the 80% discount typically offered by Housing Associations would not meet the needs of local people due to the very high house prices in West Wittering. Community Land Trusts can either become Registered Providers themselves or work in partnership with Housing Associations to ensure that housing is managed in an appropriate way and meets legal requirements.

## Principal Dwellings / Second Homes

- 4.11 Nearly 22% of homes in West Wittering are second homes. This compares to only 3.45% in Chichester City and 10.5% in neighbouring East Wittering and Bracklesham. The high proportion of second homes means that the parish appears significantly emptier out of season and local businesses and community life suffer as a result. The popularity of second homes in the area is also likely to be a driver for higher house prices.
- 4.12 In the last 10 years West Wittering parish has seen an increase from 307 to 348 second homes which is an increase of 13.3%. The number of actual properties in this time has increased by 51 dwellings (from 1,642 in October 2011 to 1,693 in October 2021) which equates to 3.1%. (Source Revenues, Benefits and Housing, Chichester District Council).
- 4.13 The survey referred to in paragraph 4.5 above included questions about the impact of second homes on the existing community. The results were as follows:
- 58% indicated that some street/roads feel less occupied due to owners not being around for longer periods;
  - 54% felt that unoccupied homes detrimentally affected the character of the community;
  - 41% considered that they caused resentment within the community / tension between permanent residents and second homers;
  - 30% said that there was difficulty getting on the property ladder due to second homes demand pushing prices up;
  - 29% said that family members had been forced out of the parish to look for cheaper properties
  - 24% felt that key workers were moving away due to lack of affordable homes;
  - 19% thought that second homes caused the permanent loss or closure of local services;
  - 18% thought that small local business owners were moving away to look for cheaper properties hence affecting local economy; and
  - 17% felt second homes caused the temporary closure of facilities out of season.
- 4.14 A policy approach for tackling this issue was introduced in the St Ives Neighbourhood Development Plan, which was made part of the Cornwall Development Plan in 2016. This has been tested successfully through the High Court and been implemented by Cornwall Council. Given this history WW5 follows closely the wording in the St Ives policy to ensure that it meets the basic conditions and is enforceable by the Local Planning Authority. Since the St Ives policy was adopted a number of other Neighbourhood Plans in areas with high proportions of second homes have included similar policies. These include Salcombe Neighbourhood Plan and Noss and Newton Neighbourhood Plan in South Hams District, Devon.

## 5.0 Landscape

5.1 As part of the evidence base for the Local Plan Review Chichester District Council commissioned a 'Landscape Capacity Study' which was carried out by Terraforma and published in March 2019. The results around the main settlement areas in the parish of West Wittering are shown below.



### Green Gap Between East and West Wittering

- 5.2 The two main settlement areas in the parish are:
- the western historic part of the village, which contains a designated Conservation Area and many listed buildings, and
  - the more modern post war eastern part of the village which abuts East Wittering.

These two areas are separated by a significant green lung / gap of farmland giving the two areas distinctive character differences and clear edges to those parts of the village envelope. It is considered important to retain this gap to protect the identity of these settlement areas and the rural character of the parish. This character is the appeal of the area and an essential part of its tourism economy.

- 5.3 The West Sussex Structure Plan 2001-2016 allocated a 'strategic gap' between the two main settlement areas in West Wittering and a smaller version of this is carried forward into Policy WW2 of the Neighbourhood Plan and the Village Design Statement (appended to the Neighbourhood Plan) because it remains valued by the community and performs an important landscape and settlement pattern function.



- 5.4 This green gap falls within areas 105 and 107 of the Landscape Capacity Study. Elms Lane forms the northern boundary of the Gap and Cakeham Road (the B2179) forms the southern boundary. The following excerpts from the Study are relevant:

Sub-area 105 West Wittering Eastern Settlement Edge

4. *Wider Landscape Sensitivity: Medium high*
- *Area generally feels separate from the settlement*
  - *Surviving small-scale field pattern either side of Elms Lane forming the setting and approach to East Wittering*
  - *Southern section links to wider landscape to south and forms part of the separation between East and West Wittering*

Sub-area 107 West Wittering Southern Coastal Plan

4. *Wider Landscape Sensitivity: Medium high*
- *Contiguous with wider landscape to west and north*
  - *Forms separation between East and West Wittering*
  - *Forms open, rural setting to West Wittering from the south-east*

- 5.5 This professional judgement on the landscape sensitivity of this area is supported by community opinion. During December 2020 and January 2021, a survey was carried out in the parish to address evidence gaps identified in the first Regulation 14 consultation. A total of 1400 paper survey forms were distributed by hand with the aim of reaching every household in West Wittering Parish. A total of 510 responses were received to the survey representing an approximately 36% response rate. The survey included questions on the importance of the green gap and whether residents felt that it was under threat. 87% indicated that it is very important to retain the green gap between the two settlements of West Wittering and 85% think the green gap area is under threat, predominantly from development.

## 6.0 Climate Change, Biodiversity and Water and Wastewater

- 6.1 The Strategic Environmental Assessment provides detailed information about the climate challenges for this area, its internationally and its nationally designated sensitive habitats. This information is not repeated in this paper.
- 6.2 The Manhood Peninsula Partnership says on its website <https://peninsulapartnership.org.uk>

*A large part of the Manhood Peninsula is less than 5m above sea level and at risk from flooding, both inland and coastal. It is likely that climate change will increase this risk, through rising sea levels, rising water tables and increased precipitation intensity. Drainage is an increasing problem on the peninsula as the existing ditches are proving inadequate to handle increased run-off resulting from recent development and heavier rainfall.*

- 6.3 The Manhood Peninsula Partnership is made up of all the parishes on the peninsula, Chichester District Council, West Sussex County Council, the Environment Agency, local flood action groups, the Manhood Wildlife and Heritage group and the RSPB. It was formed to *promote a sustainable way forward for addressing the environmental, social and economic challenges posed to the area by climate change*. Last year it updated its Integrated Coastal Zone Management Strategy with a paper titled ‘Climate Resilience and Adaptation – ICZM 2021 and beyond’. This concludes that:

*There is a demand for development on the Manhood Peninsula. We must take all opportunities through the planning process to create sustainable communities by identifying risk, locating development in areas of lowest risk, and building resilient developments in the face of climate change and the increased potential for flooding. Development should enhance the area’s sense of place and support its main economies. The future needs to be based on a strategy that will allow the peninsula to be as adaptable and resilient as possible in the decades ahead, supporting a strong visitor and food growing economy based on land use that will*

*create an environment best able to absorb both CO2 and rising sea levels while minimising the risk to residents, wildlife and ecosystems.*

- 6.4 Waste water is a major problem for the area. Sidlesham Wastewater Treatment Works covers Almodington, Selsey, Sidlesham, Bracklesham, West Wittering, East Wittering, Birdham and Itchenor. Southern Water's Drainage Strategy for Sidlesham states under "Current issues and future challenges for Sidlesham (Manhood Peninsula)':

*Over the next 25 years, population growth is expected to result in a 12% increase in domestic properties connecting to our sewers in the Sidlesham wastewater catchment. Climate change and urban creep are expected to add to surface water flows into our sewers which, in turn, will increase the number of properties at risk from surface water flooding.*

- 6.5 Public confidence in Southern Water is low following the successful prosecution from the Environment Agency in July 2021 when Southern Water was sentenced to pay record £90 million in fines for widespread pollution after pleading guilty to 6,971 unpermitted sewage discharges.
- 6.6 The outflow from Sidlesham Wastewater Treatment Works goes out to sea via Pagham Harbour which is a Special Protection Area, a Ramsar site and SSSI due to the saltmarsh and intertidal sediment which supports wildfowl and wintering birds. Regulation 63 of the Conservation of Habitats and Species Regulations 2017 states that before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which is 'likely to have a significant effect on a European site' there must be an 'appropriate assessment' of the implications of the plan or project for that site in view of that site's conservation objectives. Regulation 63(5) prohibits the grant of permission unless the competent authority (in this case usually Chichester District Council) has ascertained that it will not adversely affect the integrity of the site. Such a judgment must be reached 'beyond reasonable scientific doubt'.

## **7.0 Transport**

### **Background to the A27 Issues**

- 7.1 Road access to the Manhood Peninsula can only be gained via a small number of long north-south routes which intersect with the A27 running east-west along the top of the Peninsula. It is well recognised that the A27 is well over capacity, and that a mitigation strategy is required as a matter of urgency. Originally the mitigation scheme was to receive central Government funding, but this has been withdrawn. The current position is that since 2016 the Highway Authority has been asking for large developments to contribute to a mitigation scheme to ameliorate the recognised harm caused by further traffic and to remove the

Highway Authority objection to development which increases the number of vehicles on the A27.

- 7.2 The LPA put in place a Supplementary Planning Document (SPD) in January 2016 as the agreed approach for securing development contributions to mitigate additional traffic impacts on the A27 Chichester Bypass (A27). Briefly, the saga of the A27 is as follows:
- The Local Plan 2014-29 at page 20 recognised the infrastructure problems and aspired to “Plan to provide local infrastructure to support new development and seek opportunities to address existing infrastructure problems such as those relating to the A27 and wastewater treatment.”
  - At page 50 of the same document at para 7.18 the Local Plan recognised: “Development constraint A27 recognised in the Government Spending Review 2013 as requiring long term capital investment.”
  - However, it is now accepted by the LPA that it cannot rely on central Government funding for this congestion hot spot. So, at para 7.19 the Local Plan states that it: “Proposes to use developer contributions to fund a package of proposed improvements on A27 Chichester Bypass in period 2015-2019.”
  - There are references on page 64 para 8.7 to working with Highways England and WSCC and development promoters to identify a co-ordinated package of transport measures to mitigate projected traffic impacts from new development, including improvements to the six junctions on the A27 Chichester Bypass.
  - Policy 8 of the Local Plan states under Transport: A co-ordinated package of improvements to junctions on A27 Chichester Bypass that will increase road capacity and reduce traffic congestion.
- 7.3 Development in the area has progressed with significant sums being collected to fund a mitigation strategy. This approach to permitting development prior to the implementation of the mitigation has continued, both by the planning authority and Inspectors.

### The Current Situation

- 7.4 To date no solution has been found for the urgently needed and long overdue A27 mitigation. The LPA full Council met in July 2021 and resolved the following relating to the inability to progress the A27 mitigation:

*“RESOLVED 1. That in the absence of significant external strategic infrastructure funding, the full scheme of improvements for the A27 Chichester Bypass prepared by Stantec consultants to support the Local Plan review including the proposed Stockbridge Link Road is undeliverable. Therefore the full package (and the Stockbridge Link Road) will not be progressed further as part of the Local Plan process barring a significant change in the availability and likelihood of securing public sector funding support.*”

*2. That on the basis of recommendation 2.1 above, the Local Plan Review is likely to be unable to meet full housing needs and the Plan strategy should therefore focus on delivering as much development as possible based upon the capacity of the plan area to accommodate development (demonstrating that prioritising brownfield sites and the re-designation of unused commercial land is our priority) within an affordable and deliverable package of transport mitigation taking into account all sources of available funding.*

*3. That discussions are held with the highway authorities seeking to agree a basis for delivering growth in the Chichester Plan Area until any decision is confirmed regarding a national road scheme for the A27 Chichester Bypass, to inform (along with waste water and other constraints) a revised distribution of development for further testing.*

*4. That the Council undertakes to review the Local Plan within 5 years from date of adoption, or earlier if a national scheme of improvements for the A27 Chichester Bypass is agreed by government via the Roads Investment Strategy 3 (RIS).*

*5. That the Council's position in respect of the Duty to Cooperate with other local authorities is updated to reflect that the Council is likely to be unable to meet the full housing needs of the Chichester plan area".*

7.5 In September 2021 Cllr Taylor, the District Council's Cabinet Member for Planning issued a Local Plan Review update on 2nd September 2021. She confirmed that:

*"Extensive works and research has concluded that improvements to the A27 Chichester Bypass, a Stockbridge Link Road and sustainable transport infrastructure are required in order to meet Government Housing targets. The estimate required for the improvements are £65m, only £35-£45m will be secured through developer contributions".*

She continues by saying that National Highways and WSCC have concluded that at present this shortfall cannot be met and concludes that "As a result the A27 mitigation scheme is **not deliverable**".