

Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of the Chichester Local Plan 2021-2039

Adoption Statement

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Quality information

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Table of contents

1	Introduction.....	1
2	The Plan-making / SA ‘story’.....	1
3	Measures decided concerning monitoring	6
4	Conclusions on the SA process	6

1 Introduction

- 1.1.1 AECOM is leading on the Sustainability Appraisal (SA) process that is being undertaken alongside preparation of the Chichester Local Plan 2021 – 39 (CLP).
- 1.1.2 The formally required SA Report was published alongside the final draft ('proposed submission') version of the Local Plan in 2023 under Regulation 19 of the Local Planning Regulations, essentially with the aim of presenting an appraisal of "the plan and reasonable alternatives" as well as "an outline of the reasons for selecting the alternatives dealt with".
- 1.1.3 The Local Plan was then submitted to the Planning Inspectorate for Examination in Public in 2024 alongside the SA Report and all representations received through the preceding Local Plan / SA Report publication stage.
- 1.1.4 The appointed Planning Inspectors then oversaw Examination Hearings, followed by publication of a Post Hearings Letter on 15th January 2025, which set out the following in respect of next steps:
- "On the evidence we have read and heard to date, all of the main modifications set out in this letter are necessary for the Plan to be sound. We should be grateful if the Council would prepare a final set of main modifications for our review prior to consultation on them. The main modifications should be subject to Sustainability Appraisal and/or Habitats Regulations Appraisal as appropriate."*
- 1.1.5 The Council then consulted on Main Modifications to the Local Plan (as previously submitted) between April and May 2025, and an SA Report Addendum was published alongside.
- 1.1.6 Most recently, the Inspectors' Report was published on 21st July 2025, setting out that the plan is legally compliant and sound provided that a series of Main Modifications are made. These final Main Modifications align very closely with those previously published for consultation in April - May 2025.¹
- 1.1.7 The next step is to move forward with formally adopting the Local Plan, and this SA Adoption Statement aims to inform this step as well as to inform plan implementation.
- 1.1.8 Specifically, **this SA Adoption Statement** aims to do two things:
- 1) Explain the '**story**' of plan-making / SA up to the point of adoption²
 - 2) Present measures decided concerning **monitoring**.
- 1.1.9 These two matters are considered in turn.
- 1.1.10 Finally, whilst the focus of this report is SA, Section 1.2 presents a brief statement on HRA. There is no formal requirement to report on HRA at this stage, but Section 1.2 aims to bring the 'story' up-to-date.

1.2 A brief statement on Habitats Regulations Assessment

- 1.2.1 AECOM was appointed by Chichester District Council to assist the Council in undertaking a Habitats Regulations Assessment (HRA)³ of the CLP at the Regulation 19 stage. The HRA included an appropriate assessment and concluded that no adverse effect on the integrity of any European sites (Also now known as "Habitats sites") would arise either alone or in combination with other projects and plans, and that the Local Plan had a suitable framework in place to ensure that development delivered would not affect the integrity of any Habitats sites either alone or 'in-combination' with other plans and projects.

¹ The Inspectors explain: "In some cases we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them."

² Specifically, there is requirement to: "summaris[e] how environmental considerations have been integrated into the plan....and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of...reasonable alternatives..."

³ www.chichester.gov.uk/media/38556/Habitats-Regulations-Assessment-January-2023/pdf/CDC_Local_Plan_HRA_2023_Final.pdf?m=1684402254580

- 1.2.2 Following the production of that HRA Report, a Pre-Submission Modifications Addendum⁴ was produced, which assessed a range of modifications to the CLP and contained an updated air quality impact assessment specifically relating to The Mens SAC and Duncton to Bignor Escarpment SAC. The report also presented an updated nutrient budget for the Local Plan which concluded that while the proposed housing numbers had changed, no significant change would occur to the HRA conclusions.
- 1.2.3 The updated nutrient budget is not significantly larger than the previous one and would require only around 1 hectare of additional arable land to be removed from production and rewilded, which does not change the conclusion that sufficient offsetting should be achievable without particular difficulty. The report concluded that the modifications would not result in a likely significant effect on European sites. It also concluded that following the updated air quality modelling no adverse effect would arise on any European Habitats sites.
- 1.2.4 Natural England agreed with this conclusion regarding Duncton to Bignor Escarpment SAC and to all pollutants at The Mens SAC except ammonia. As a result, an Outline Air Quality Mitigation Strategy⁵ was produced jointly with Horsham District Council, based on modelling for the Horsham Local Plan⁶ (as the biggest contributor to the change in vehicle flows on the A272 past The Mens SAC). This sets out the Councils approach to addressing ammonia emissions due to traffic growth on the A272.
- 1.2.5 Following the Examination into the CLP, the Inspectors recommended a series of Main Modifications (MM) to be made to the CLP. These have been agreed with officers and inspectors in the “Chichester District Council Schedule of Main Modifications to the Chichester Local Plan 2021 – 2039 Proposed Submission”.⁷
- 1.2.6 Included in the modifications is a proposed policy specifically intended to address the issue of air quality at The Mens SAC. The Main Modifications were assessed in March 2025 and determined not to affect the conclusions of the HRA of the CLP.
- 1.2.7 As part of the public consultation on the Main Modifications in May 2025 Horsham District Council recommended some amendments to the wording of the proposed policy regarding The Mens SAC to reflect the fact that the majority of the forecast impact arose from the Horsham Local Plan and the uncertain status of their Local Plan, following their Local Plan Inspector’s recommendation that they withdraw the Local Plan from Examination. Those amendments were made to the final version of the policy, as discussed within the Inspectors Report (21st July 2025).

2 The Plan-making / SA ‘story’

2.1 Introduction

- 2.1.1 Key steps were as follows:
- Early Regulation 18 consultations (2017 to 2019)
 - Regulation 19 publication (2023)
 - Main Modifications (2025)
 - The Inspectors’ Report (2025)

⁴ www.chichester.gov.uk/media/39568/Habitat-Regulations-Assessment-Pre-Submission-Modifications/pdf/Final_Chichester_Local_Plan_Review_Modifications_HRA.pdf?m=1714468981663

⁵ www.chichester.gov.uk/media/40150/PS-CC23-HDC-CDC-LPs-Air-Quality-Mitigation-Strategy/pdf/PS.CC23_-_HDC_CDC_LPs_Air_Quality_Mitigation_Strategy.pdf?m=1726229249150

⁶ www.chichester.gov.uk/media/40153/PS-RCC03-HDLP-HRA-Air-Quality-Addendum/pdf/PS.RCC03_-_HDLP_HRA_Air_Quality_Addendum.pdf?m=1726229249880

⁷ www.chichester.gov.uk/media/41091/MC05-Chichester-Local-Plan-HRA-Addendum-Main-Mods-March-2025/pdf/8_MC05_-_Chichester_Local_Plan_HRA_Addendum_Main_Mods_March_2025.pdf?m=1744115963533

2.2 Early Regulation 18 consultations (2017 to 2019)

- 2.2.1 Early in the plan making process the Council carried out an issues and options consultation in June 2017, which laid the foundations for a formal Regulation 18 consultation on a 'Preferred Approach' in December 2018. An SA report (specifically an 'Interim' SA Report, which is the appropriate title for any report published under Regulation 18 as part of the SA process) was published as part of both consultations.
- 2.2.2 There is no need to report on these early stages in detail at the current time, including because the reality is that understanding of key plan issues / options moved on considerably between 2019 and the Regulation 19 publication stage in 2023 (discussed below). However, it is important to say that work reported in the two Interim SA Reports published as part of the two Regulation 18 consultations did feed into plan-making and SA work undertaken in 2022/23 (also 2020 and 2021, but the key period was 2022/2023) ahead of preparing the Proposed Submission Local Plan and SA Report for publication (Regulation 19). This was reported in the SA Report (2023), in particular:
- Section 5.2 of the SA Report – discussed high level / strategic factors with a bearing on work to define reasonable alternatives (which was the focus of Section 5 as a whole). Under certain of the topic-specific sub-headings the aim was to explain a story over time, specifically a story about how understanding of issues / options had evolved over the period 2019 to 2023 including in light of SA work and consultation.
 - Section 5.4 of the SA Report – was the penultimate step in the process of defining reasonable alternatives (which was the focus of Section 5 as a whole). It signposted to detailed analysis in Appendix V of the report where each of the parishes in the plan area was considered in turn. Across numerous of the parish-specific sections discussion was presented regarding a story over time (as above).

2.3 Regulation 19 publication (2023)

- 2.3.1 The Proposed Submission version of the CLP was published under Regulation 19 of the Local Planning Regulations in 2023 in February 2023 and the formally required SA Report was published alongside.
- 2.3.2 The SA Report was structured as follows:
- Part 1 – presented information on reasonable alternative growth scenarios, specifically:
 - Section 4 (Introduction to Part 1) – explained why the focus was on 'growth scenarios' with a view to discharging the key legal requirement to define, appraise and consult upon reasonable alternatives. It defined growth scenarios as essentially alternative key diagrams and more specifically as alternative approaches to *"providing for a supply of land, including by allocating sites and potentially broad areas (NPPF paragraph 68), to meet objectively assessed needs and wider plan objectives, as far as possible (i.e. as far as consistent with sustainable development, as per NPPF paragraph 11)."*
 - Section 5 (Defining growth scenarios) – explained a process over time leading to the definition of two sets of reasonable alternative (RA) growth scenarios, specifically one set for the Southern Plan Area and another set for the Northeast Plan Area. Work from the preceding Regulation 18 consultation stages fed in (as discussed) alongside detailed work undertaken in 2022/23, including work to explore strategic factors (Section 5.2), site options (Section 5.3) and options / scenarios by Parish (Section 5.4). Ultimately this process led to the following sets of RA growth scenarios (Section 5.5):
 - South Plan Area – seven scenarios were defined with total supply ranging from 527 homes per annum to 566 homes per annum.
 - Northeast Plan Area – four scenarios were defined with total supply ranging from 29 homes per annum to 109 homes per annum.
 - Section 6 (Growth scenarios appraisal) – presented an appraisal of the two sets of scenarios, with each appraisal presented in the form of an appraisal 'matrix', with a column for each of the scenarios and a row for each of the sustainability topics that together comprised the appraisal 'framework'. Across both of the appraisals a key message was that for the most part each of the scenarios appraised was associated with a range of pros and cons, and it is important to note that the aim of the appraisals was primarily to communicate these effectively rather than seeking to arrive at an overall conclusion regarding which of the scenarios was best/worst performing overall, i.e. on balance. However, the appraisals did give some strong steers regarding overall performance; most notably in respect of the highest growth scenario appraised for the Northeast Plan Area, which was shown to perform poorly other than in respect of one sustainability topic, namely 'housing'.

- Section 7 (The preferred growth scenario) – presented the Council's response to the two growth scenarios appraisal from Section 6. The Council's statements are presented below (abridged):
 - South Plan Area – *“The appraisal shows Scenario 3 to perform well, with few drawbacks relative to the reasonable alternatives. Higher growth at Southbourne, in place of an allocation at Maudlin Farm, Westhampnett, may be identified as preferable in a number of respects; however, there are significant concerns with regard to deliverability of a higher quantum of housing. Due to the need for infrastructure upgrades to the wastewater treatment works at Thornham, development is unlikely to be deliverable in this area in the first five years of the plan period and further development here will lead to a greater proportion of the overall development proposed by the plan being delivered later in the plan period. Given the resultant late delivery of development, it is therefore unlikely that a greater number of dwellings that 1,050 will be deliverable within the lifetime of the plan...”*
 - Northeast Plan Area – *“Meeting housing needs locally is a priority issue. However, the appraisal serves to highlight a wide range of drawbacks to supporting the highest levels of growth, including a number that are highly significant. These drawbacks relate both to the unsuitability of the northeast plan area as a whole, as a location for significant growth, including around unsustainable travel patterns and risks to achieving water neutrality (at least under the highest growth scenario; this is also an issue for the timing of growth); and settlement and site-specific considerations, including at Kirdford, Wisborough Green and Crouchlands Farm. At all of these locations it is difficult to envisage the potential to justify the impacts that would result from significant growth, given assumed growth locations / sites, and knowledge of scheme proposals. As the higher and highest growth scenarios at Loxwood may involve an expansion to the west of Loxwood, it has been necessary to consider this in more detail, notwithstanding that it would be for the neighbourhood plan to consider any site allocations. With regards to strategic expansion to the west of Loxwood, there are fewer constraints to growth here than is the case for the other villages. However, there is insufficient confidence regarding deliverability of the full (~1,000 home) scheme. Turning to the 400 home scheme assumed by the appraisal under a higher growth scenario, it is notable that latest information from the site promoters is that the site capacity is 325 homes. Furthermore, it is considered more reasonable for the neighbourhood plan to consider the potential for any allocation of this site to potentially include a first phase for around 150 homes, rather than supporting delivery of the site in its entirety in the plan period. This would address concerns regarding deliverability (market saturation) and will encourage a masterplanned approach for the site as a whole (which does form an obvious parcel, with clear boundaries). Finally, the capacity of smaller sites around the village is 70, which brings the total preferred parish allocation for Loxwood to 220 homes. Having regard to the above, the preferred scenario provides a blend between Scenario 1 and Scenario 2 (as introduced above), with an downward adjustment for Loxwood (from the higher scenario).*
- Part 2 – presented an appraisal of the Proposed Submission CLP as a whole, concluding:
 - **Significant positive effect** – predicted under **three topics**: Economy/employment; Transport; Water.
 - **Moderate or uncertain positive effect** – predicted under **one topic**: Communities.
 - **Neutral effect** – predicted under **four topics**: Accessibility; Air quality; Biodiversity; Climate change adaptation; Historic environment; and Landscape.
 - **Moderate or uncertain negative effect** – predicted under **one topic**: Climate change mitigation.
 - **Significant negative effect** – predicted under **two topics**: Homes; and Land/soils

2.4 Main Modifications (2025)

- 2.4.1 A series of Main Modifications (MMs) to the CLP (as submitted) were agreed with the Inspectors following Examination in Public (EiP) hearings and published for consultation in April 2025. It is important to note that representations received through the preceding Regulation 19 publication stage, including those on or informed by the SA Report, fed into the EiP and decision on draft MMs.
- 2.4.2 An SA Report Addendum was published alongside, which primarily sought to present an appraisal of the MMs but also took account of the effect of the MMs in combination with wider aspects of the originally submitted CLP (i.e. those aspects not subject to modification) and, in doing so, sought to update the appraisal conclusions presented in Part 2 of the SA Report.

- 2.4.3 The SA Report Addendum did not present information on reasonable alternatives (RAs), as discussed in Section 3 of the Report. Specifically, Section 3 explained: “... the question is whether there are any reasonable growth scenarios at the current time, in light of latest evidence and understanding, including understanding generated through the EiP to date. More specifically, the question is whether there are any alternative approaches that might be taken (relative to the latest proposed approach...) involving: lower growth; higher growth; or an alternative approach to distributing the preferred growth quantum.” Feasible RAs were discussed before a conclusion was reached that: “... there are currently no reasonable alternatives.”
- 2.4.4 The appraisal of MMs was presented in Section 4 of the report, with the conclusion as follows:
- “The key consideration is the proposal to increase the housing requirement without identifying specific new supply (at this stage; i.e. specific new supply will be identified through a subsequent Site Allocations DPD or a new Local Plan) and in the context of an adjusted approach to A27 mitigation. A secondary issue is then the proposal to delete text quantifying the extent to which the spatial strategy is focused on the southern plan area. These proposed changes [are supportive of] ‘homes’ objectives but give rise to a modest degree of tension in wider respects, most notably in terms of ‘transport’ objectives. This serves to highlight the importance of ongoing monitoring and work to monitor and manage transport impacts.”*

2.5 The Inspectors’ Report (2025)

- 2.5.1 The Inspectors’ Report begins with a Non-technical Summary which lists out the final MMs that are needed in order to make the plan sound (such that it can be adopted). Key MMs are as follows:
- Ensure that the Plan would be effective in providing for a monitor and manage approach to traffic issues relating to the A27, part of the strategic road network
 - Increase the housing requirement to 11,484 for the plan period so that the Plan meets objectively assessed housing need
 - Provide for a stepped housing requirement, with the annual provision of housing development to increase in the latter part of the plan period once the monitor and manage arrangements are established
 - Make clear how the overall housing requirement would be met by the various parts of the modular development plan in the plan area
 - Increase the percentage of custom/and or self-build housing which should be provided on strategic housing sites to meet identified needs
 - Amend the Horticultural Development Areas Policies to clarify the types of development which will be permitted within the designated areas
 - Add a new policy to the Plan for the monitoring of traffic and the proportion of petrol and hybrid vehicles and ULEVs on the A272, passing the Mens SAC to address potential in-combination effects on the SAC with development in Horsham District
 - Amendments to the Council’s approach to development affecting the historic environment so that they are consistent with national policy
 - Make detailed adjustments to particular site allocations
 - A number of other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy
- 2.5.2 These are all matters that were a focus of the preceding SA Report Addendum, most notably matters relating to the housing requirement / supply and the closely related matter of A27 capacity issues.
- 2.5.3 Whilst the final MMs do reflect some adjustments relative to those previously appraised and published for consultation, these adjustments are minor and do not have any significant bearing on the appraisal of MMs previously presented within the SA Report Addendum. The Inspectors explain: “None of the amendments significantly alters the content of the modifications as published for consultation...”
- 2.5.4 With regards to the SA the Inspectors focus on the role of the SA process in terms of informing spatial strategy / site allocations / supply on the Manhood Peninsula, explaining:

“The spatial development strategy in Policy S1 of the submitted Plan, amongst other things, aims to reinforce the role of the Manhood Peninsula as a home to existing communities, tourism and agricultural enterprise, and the Plan does not allocate further land for housing development there. That said, examination document CDC15.02 indicates that the broad distribution of development in the Plan is for there to be 1,094 dwellings at the Manhood Peninsula in the plan period. CDC19, the written note on housing completions and future delivery by sub area, identifies that around 10% of future delivery of houses will be at the Manhood Peninsula. The provision of further housing at the Manhood Peninsula was considered through the sustainability appraisal process in the plan making process with reasonable alternatives considered and assessed as appropriate at different stages in plan preparation. There are clear reasons why the Council decided not to make further allocations at the Manhood Peninsula, and the sustainability appraisal is clear as to why that decision was made.”

3 Measures decided concerning monitoring

- 3.1.1 Section 11 of the SA Report presented a number of suggestions for monitoring indicators, albeit recognising that there is a need to carefully target monitoring efforts in light of resource constraints.
- 3.1.2 Monitoring was then an important focus of the Main Modifications consultation, particularly in terms of monitoring A27 traffic and also traffic in the vicinity of the Mens SAC (where air quality is an issue). In turn, monitoring is also a key focus of the Inspectors' Report, as discussed above (para 2.5.1). Also, the Inspectors' Report explains:

“In addition, to be effective and as a consequence of the various MMs recommended, it is necessary to update the Monitoring Framework set out in Appendix F of the submitted Plan. To enable the Monitoring Framework to be justified, text should be added to Appendix F to explain the monitoring arrangements for the policies of the Plan. These changes are set out in MM86.”

4 Conclusions on the SA process

- 4.1.1 This Adoption Statement demonstrates that a legally robust SA process was undertaken alongside plan-making, with appraisal findings and consultation responses feeding into decision-making at key junctures.
- 4.1.2 Most importantly, in terms of compliance with both the SEA Regulations⁸ and Local Planning Regulations,⁹ the SA Report was published under Regulation 19 in 2023, presenting an assessment of “the plan and reasonable alternatives”, and this assessment informed representations and subsequent plan finalisation.
- 4.1.3 This Adoption Statement is the final step in the SA process. Its aim is to explain the ‘story’ of the plan-making / SA process, and also present measures decided concerning monitoring. Table 4.1 serves to demonstrate that this Adoption Statement presents the required information.

⁸ Environmental Assessment of Plans and Programmes Regulations 2004

⁹ Town and Country Planning (Local Planning) (England) Regulations 2012

Table 4.1: Regulatory checklist

The Adoption Statement must...	Information presented above
Summarise how environmental (and wider sustainability) considerations have been integrated into the plan	<p>This Statement has sought to provide examples of key sustainability considerations that have been highlighted through appraisal and consultation and, in turn, integrated into the plan-making process.</p> <p>First and foremost, the relative merits of reasonable alternative growth scenarios were appraised with a view to informing consultation and decision-making.</p>
Summarise how the SA Report and consultation responses received, as part of the Draft Plan / SA Report consultation, have been taken into account when finalising the plan.	<p>This Statement seeks to explain a stepwise process over time. It was naturally the case, at each step in the process, that account was taken of all available evidence including consultation responses received.</p> <p>Further information on consultation responses received is presented within the Regulation 22 Consultation Statement (2024), which is examination document SD06.</p>
Summarise the reasons for choosing the plan as adopted, in the light of reasonable alternatives.	<p>Reasonable alternatives were defined and assessed in 2023 in order to inform decision-making ahead of Regulation 19 publication, with officers providing a response to the assessment, equating to the Council's reasons for supporting the preferred option.</p>
Summarise the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan	See Section 3