

# Agenda Item 5



## Chichester City Council

### PLANNING ADVISER'S REPORT FOR THE PLANNING AND CONSERVATION COMMITTEE MEETING ON 30 JANUARY 2025 AT 4PM

Week 1

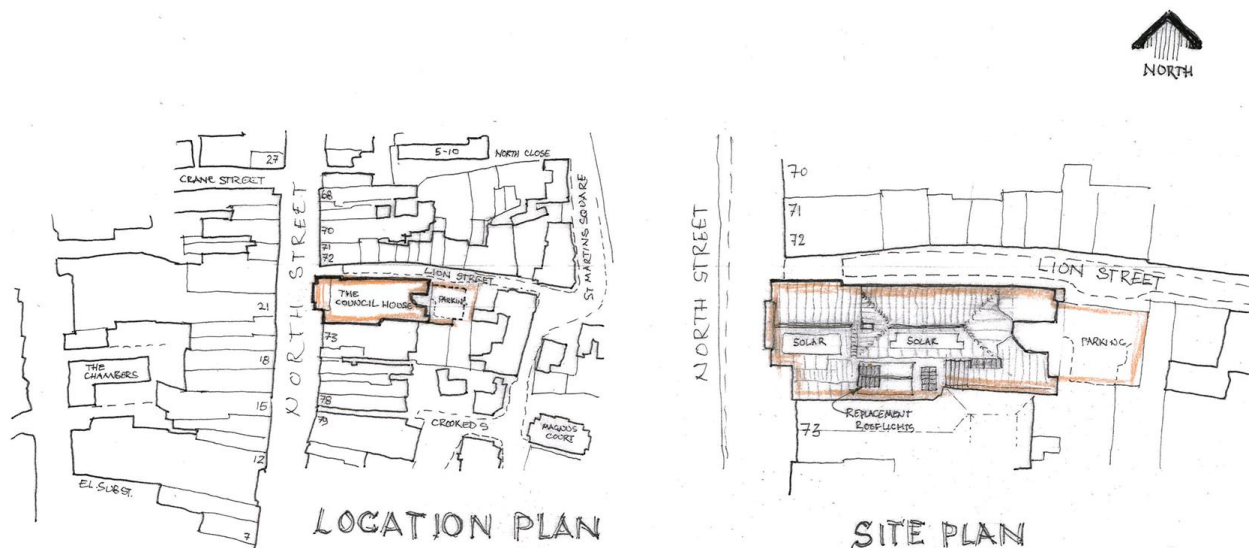
Note: This is an application by Chichester City Council for development on its own land. To note. CC/24/02805/LBC - Case Officer: Vicki Baker  
Property Maintenance Manager Andy Watson  
Chichester City Council The Council House North Street Chichester  
Replacement roof lantern.

To view the application use the following link; <https://publicaccess.chichester.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=SO7VVUERMLM00>

#### Key issues

- The application site is The Council House, a grade II\* listed building which houses the offices of Chichester City Council.
- This is an application for Listed Building Consent to replace a 1970s aluminium roof lantern, which it at the end of its useful life and is not original to the listed building, with a new, more thermally efficient double-glazed aluminium lantern. It is also proposed to reinstate the original ridgeline of the roof across the top of the lantern.
- The lantern is not visible from the public realm, due to its position on the roof, but its appearance would remain similar to the existing both externally and from within the building.
- The application is supported by the Conservation Officer and the CCAAC do not object.
- There would be no harm to the character or appearance of the listed building as a result of the proposal and no impact upon the Conservation Area.

Recommendation: To note the application.





Key issues

- This is not an application for planning permission, but an application for Prior Approval for conversion of the first and second floors only into flats under Class MA permitted development rights.
- The ground floor, occupied by Barclays Bank, would be unaffected. The external appearance of the building would also be unaffected.
- For this type of application, the considerations of the LPA are limited to: Transport impacts, land contamination, flood risk, impact of noise from surrounding commercial premises on the intended occupiers of the development, provision of adequate natural light in all habitable rooms.
- There would be little transport impact from 5 additional flats in this sustainable, city centre location. The site is in a low flood risk area and the City Council is not aware of any contamination issues at the site. Residential occupation of the upper floors of buildings in the city centre is common and the noise from surrounding uses does not normally unacceptably harm the amenity of these residents, though noise levels vary throughout the city centre area. In this case a noise assessment concludes noise levels in the building would generally be acceptable, some first floor windows would require secondary glazing. There would be adequate natural light to all habitable rooms.

Recommendation: No objection



# Agenda Item 8



## Chichester City Council

### Net Zero Working Group

4 December 2004 at 2.30pm

The Council Chamber, The Council House, North Street, Chichester

#### Meeting notes

#### **In attendance:**

- **Councillors:** Robert Miall (RMI), Ann Butler (AB) (2nd half)
- **Officers:** Town Clerk (TC) – first half, Council Services and Support Manager (CSSM), Property Maintenance Manager (PMM), Project Manager (PM)

**Others:** None

#### **1) Election of Chairman**

Only one Councillor was present so insufficient for formal selection of Chair. Officers reported to RMI on the points on the agenda.

#### **2) Review of City Council progress towards net zero**

- PMM summarised his report on current progress of the City Council towards Net Zero.
- PMM reminded the group that the City Council goal was to achieve net zero by 2030.
- Group was advised that the City Council is on track to meet net zero for scope 1 and 2.
- Discussion around Scope 3 emissions that are not directly within an organisation's control as it relates to emission related to purchase of good, waste disposal, investments, etc. City Council can influence these emissions through procurement policy requiring assurances that our suppliers' standards align with ours.
- Noted that standards are given by providers that are regulated, but the figures provided to customers and standards agencies are different.
- The group noted that since 2020, there had been a gradual improvement in offsetting the City Council's carbon emissions. Currently we are at 56.7%, over halfway with 5 years to go.
- PMM advised that further measures would include:
- installing lighting sensors to save money on lighting.
- With the introduction of the new boiler, we have reduced the number of heating zones we can fit a new thermostat that would allow us to control zones.
- Educating Officers to turn off electrical systems and lights when not in use has helped to reduce emissions.
- The group noted that the District Council have had to backtrack on their pledge for 2030 and are working towards 2050.
- RMI suggested that the City Council should promote this achievement so far – website, Instagram and Facebook – especially in light of the constraints imposed by the grade two\* listing of the Council House.
- Further suggestions that a press release could be created and the efforts promoted on a City Council LinkedIn page.
- PMM commented on the external illumination of the Council House and Market Cross – group advised that outside lights to be controlled remotely, timed and coloured via the bulb rather than gels, which are single use plastics.

- Referring to the PMM's report, noted that travel by staff is a concern. Also travel abroad to visit Twinning Associations.
- Agreed that future procurement needs to focus on what is cost-effective and sustainable and that efforts should be made to use companies that are registered under B-Corp

### **3) Review options for co-working with local energy co-operatives on decarbonisation, local energy production and the related funding opportunities**

- Group was advised that Chichester District Council operated a solar farm, and efforts could be made to engage with them.
- Officers were asked to find out why the wind turbine didn't work in St Paul's Allotment, as the Carbon Offset is an issue.
- Group was advised that energy companies are providing mapping software to see where the capacity is have put more energy back into the grid.
- Agreed that this would require additional work and this would be reported back to the next meeting.

### **4) Consideration of opportunities for bio-diversity and environmental enhancements**

- The group noted the project that had rewilded Brewery Field and discussed further efforts that could be made in this area.
- Further to comments from the PM, agreed that contact be made with the landowner of an unused field on the eastern edge of the Parish, next to the River Lavant, with a view to discussing rewilding.
- Group noted AB's comments about sewage outflow issues in the local waterways.

### **5) Consideration of hosting an event at the Council House to assist residents in reducing their carbon footprints**

- Suggestion of community workshops involving Energise South Downs. AB suggested involving Transition Chichester in any events of this type.
- Encouraging residents to reduce their carbon footprint
- Noted that the District Council has a green week which the City Council could investigate joining in with.
- Revive the previously cancelled "Tree Summit" (cancelled due to Covid lockdown), bringing together individuals, landowners and organisations to plant more trees.
- Agreed that any events of this type should aim to demystify the ways you can reduce your carbon footprint.
- Agreed to explore further collaboration with the District Council.

### **6) Items for next meeting**

Covered in the notes and actions arising below.

### **7) Date of next meeting**

23 January 2025 at 2.00pm

### **Actions arising:**

- Procurement Policy review
- Publishing the efforts made by the Council (PM and the Comms Officer)
- Investigate what happened to the wind turbine (PMM)
- Investigate "tap-in" points where community energy generation projects could potentially connect to the National Grid
- Summary of discussions to Planning and Conservation Committee on 30 January 2025

- Organise community events to help encourage the public to reduce their carbon footprint and promote bio-diversity and tree planting.



Chichester City Council

**REPORT to NET ZERO WORKING GROUP**

**NET ZERO SCOPE 1 & 2 EMISSIONS**  
**2024-2025**

**DRAFT**

**BY**  
**PROPERTY & MAINTENANCE MANAGER**  
**ANDREW WATSON**  
**Date: 19/11/2024**

**Group Members:**

S Quail  
S Tate  
A Butler  
R Miall  
L Pramas  
J Vivian  
J Brigden  
G Bowen  
K Coffey  
A Watson

## Executive Summary

This report outlines our progress and commitments towards achieving net zero emissions, focusing on Scope 1 and Scope 2 greenhouse gas (GHG) emissions. Scope 1 encompasses direct emissions from owned or controlled sources, while Scope 2 addresses indirect emissions from the generation of purchased electricity, steam, heating, and cooling consumed by the organization.

Our goal is to reach net zero emissions by 2030, which was agreed in 2020 aligning with global climate objectives and ensuring sustainable operations. This report provides an overview of our current emissions, reduction strategies, and progress towards achieving net zero for Scope 1 and 2 emissions.

### 1. Baseline Emissions Inventory

#### Scope 1: Direct Emissions

Scope 1 emissions arise from activities directly controlled by the organization, including:

- Combustion of fuels in owned vehicles and equipment.
- Stationary sources such as boilers, furnaces, and generators.
- Process emissions from chemical or physical processes.

Baseline Year: 2020:

- Total Scope 1 emissions 24 metric tons of CO<sub>2</sub>e

#### Scope 2: Indirect Emissions

Scope 2 emissions result from the production of electricity, steam, heating, or cooling consumed by the organization.

- Purchased electricity contributes significantly to Scope 2 emissions.
- District heating or cooling systems also fall under this scope when applicable.

Baseline Year: 2020:

- Total Scope 2 emissions: 3.7 metric tons of CO<sub>2</sub>e

*It must be noted that in 2021 report was commissioned by the council, performed by "SaveMoneyCutCarbon". They reported that Scope 2 at 10.9, it appears that some information passed to them for analysis may have been incorrect.*

### 2. Emission Reduction Strategies

Our strategy to achieve net zero encompasses emission reductions through operational efficiency, renewable energy, and offset measures.

#### Scope 1 Reduction Initiatives

- Transition to Low-Carbon Fuels
  - Replace fossil fuels with biofuels or green hydrogen in operations.
  - Electrify vehicle fleets with electric vehicles (EVs).
- Operational Efficiency
  - Optimize energy use in production processes and equipment
  - Implement new equipment to reduce emissions.
  - Implement predictive maintenance to minimize energy waste.
- Carbon Capture and Storage (CCS)
  - Explore technologies to capture and store emissions from combustion or industrial processes.

#### Scope 2 Reduction Initiatives

- Renewable Energy Procurement



- Shift to 100% renewable electricity through Power Purchase Agreements (PPAs) or on-site solar/wind installations.
- Energy Efficiency Upgrades
- Retrofit facilities with energy-efficient lighting, HVAC systems, and automation technologies.
- Engagement with Utility Providers.
- Collaborate with energy providers to expand access to renewable energy grids.

### 3. Progress to Date

#### Scope 1 Reduction:

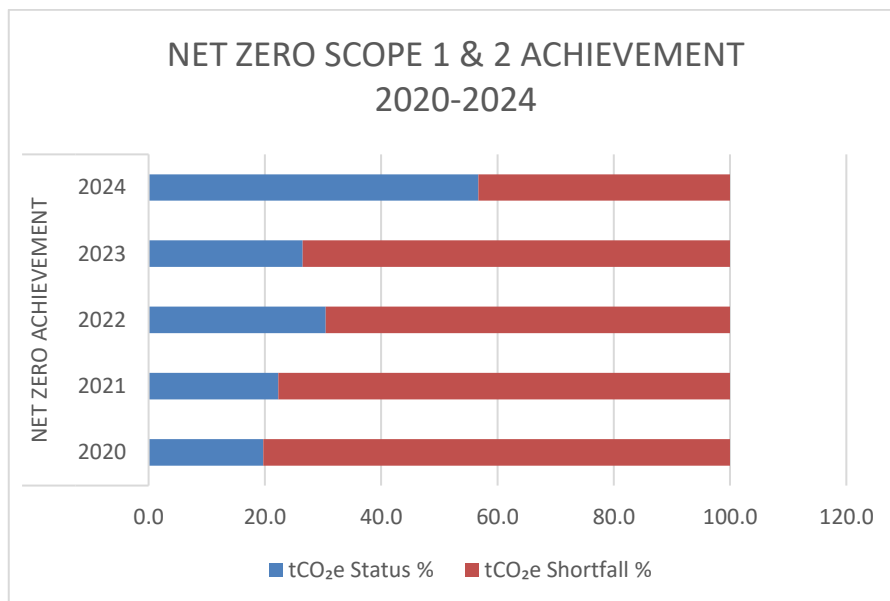
- Year 2020-2024 reduction achieved since baseline year through purchase of Electric Van and fuel efficiency measures.

#### Scope 2 Reduction:

- Year 2020-2024 reduction achieved by transitioning to renewable energy sources for electricity and optimizing energy use. e.g., installation of on-site solar panels generating 6831 kWh/year in 2020 solar panels were generating 3433 kWh/year, increasing by 100%.

#### Reduction in Scope 1 and 2 emissions

- 2020 Baseline: 19.7%
- 2021: Achieve 22.3% (Due to: EV & Solar 2 Phase 1)
- 2022: Achieve 30.5% (Due to: LED Lighting)
- 2023: Achieve 26.5%
- 2024: Achieve 56.7% (Due to: New Boilers and Solar 2 Phase 2)
- 2025: Achieve TBA (Due to Secondary glazing, Solar Pohase 2 Batteries, Roof Insulation.....)



### 4. Future Commitments and Targets

#### Milestones

- 2025 – Solar Batteries installed increasing solar generated power from 6831 kWh/year to 9820 kWh/year. Increasing by 50% generation.
- 2026 – Change electricity supplier to one focused on renewables.
- Scope 3 – Assessment needs to be scheduled and information collated, this will be a major challenge, as initial findings wipes out the potential success of Scope 1 & 2 and we will have find ways to offset our emmissions.

## Investments

- 2025 - Allocate **£xxxxx** for renewable energy projects and efficiency upgrades e.g. proximity sensors for lighting in offices, toilets and corridors. SMART external LED lighting for front of the Council House and Market Cross. Additional solar panels for St James Yard.
- Partner with technology providers to enhance carbon tracking and reporting systems.
- Investigate schemes to allow employees to own electric vehicles at no cost to the Council.
- Investigate schemes locally to offset emissions.

## 5. Monitoring and Reporting

To ensure accountability and transparency, we will:

- Regularly Monitor emissions using advanced data analytics and IoT-enabled tracking systems.
- Publicly Report progress annually, in alignment with global frameworks like the Greenhouse Gas Protocol and Science Based Targets initiative (SBTi).
- Engage Stakeholders, including employees, suppliers, and customers, to foster collective action.

## 6. Conclusion

Achieving Net Zero Scope 1 and 2 emissions is a critical step in our sustainability journey. Through strategic investments, operational improvements, and commitment to renewable energy, we are making significant strides toward our Net Zero target. We invite all stakeholders to join us in this mission to ensure a sustainable future.

## Appendix

- GHG Emissions Calculation Methodology
- <https://ghgprotocol.org/calculation-tools-and-guidance>
- Detailed Baseline Data

SCOPE 1 & 2 SUMMARY					
	tCO <sub>2</sub> e OFFSET				
	2020	2021	2022	2023	2024
<b>Offset Systems</b>					
CH Solar 1	0.7	0.4	0.7	0.5	0.8
CH Solar 2		1.3	1.3	1.3	1.3
St Js Solar					0.2
EV 1		0.0	0.5	0.5	0.0
EV Mower				0.3	0.3
Trees	5.1	5.1	5.1	5.1	5.1
CH Lighting					0.0
Water Saving					
Purchases					1.3
<b>Totals</b>	<b>5.8</b>	<b>6.8</b>	<b>7.6</b>	<b>7.6</b>	<b>8.9</b>
	<b>tCO<sub>2</sub>e EMISSIONS</b>				
<b>Energy Supplies</b>					
Electric Usage	3.7	4.5	4.0	2.6	0.8
Unmetered Electric Usage	1.7	1.7	1.7	1.6	0.3
Gas Usage	20.72	20.52	14.23	17.25	9.07
Water Usage	-0.06	0.01	0.09	0.07	0.05
Water Waste	-0.17	0.03	0.16	0.12	0.09
<b>Waste</b>					
General & Recycled Waste					
<b>Travel</b>					
Travel			1.5	3.1	
Employee Commute	2.65	2.65	2.65	3.34	4.56
<b>Vehicles</b>					
Tipper	0.9	1.1	0.7	0.5	0.8
<b>Totals</b>	<b>29.4</b>	<b>30.5</b>	<b>25.0</b>	<b>28.6</b>	<b>15.7</b>
	<b>NET ZERO ACHIEVEMENT</b>				
	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
tCO <sub>2</sub> e Status %	<b>19.7</b>	<b>22.3</b>	<b>30.5</b>	<b>26.5</b>	<b>56.7</b>
tCO <sub>2</sub> e Shortfall %	<b>80.3</b>	<b>77.7</b>	<b>69.5</b>	<b>73.5</b>	<b>43.3</b>

For more information or to provide feedback, please contact Andrew Watson [a.watson@chichestercity.gov.uk](mailto:a.watson@chichestercity.gov.uk)

# Agenda 9



## Chichester City Council

### **TO NOTE: REVISED NPPF PUBLISHED DECEMBER 2024 UPDATE REPORT FOR THE PLANNING AND CONSERVATION COMMITTEE MEETING ON 30 JANUARY 2025 AT 4PM**

The revised National Planning Policy Framework (NPPF) was published on Wednesday 12 December. The new NPPF can be viewed online using the following link: [National Planning Policy Framework - Guidance - GOV.UK](#). Members were informed about possible changes to the NPPF during the government's consultation in August-September 2024.

As set out within the consultation, the government aims to provide 1.5 million homes during this Parliament, or 370,000 homes annually, and the national planning changes are intended to assist in achieving this. The proposed changes to the Standard Method for calculating local housing need have now been enacted through the NPPG.

Previously, housing need calculations were based on population projections from 2014. The new method is based on a baseline annual requirement of 0.8% of the current housing stock in an area. This is then increased further in some areas, where the affordability ratio indicates a requirement for increased provision.

Chichester District's housing need according to the old method of calculation is 760, of which 125 are accommodated within the SDNP area. There was some adjustment allowed for areas unable to meet this need due to various circumstances. Accordingly, CDC's emerging LP (currently under examination) plans for 575 dwellings per annum, due to A27 capacity.

Chichester District's housing need according to the new method of calculation is 1,305. This is because 0.8% of housing stock amounts to 490.48 dwellings, and then an affordability factor of 2.66 is applied. CDC and the SDNP will need to agree how much of the new housing requirement will need to be provided within the SDNP as part of their work on their next Local Plans. No downward adjustment of this figure is allowed for any circumstances.

The new calculation must be applied immediately in areas with no up-to-date Local Plan.

LPAs are now required to maintain a full 5-year housing land supply. The protections for areas covered by a Neighbourhood Plan which allocates housing sites are retained.

Where Local Plans are out of date or there is no 5-year housing land supply in place, paragraph 11d of the NPPF previously set out that planning permission should be granted for housing applications unless there were 'clear' reasons for refusal; whereas the wording now requires 'strong' (rather than 'clear') reasons for refusal. LPAs must also consider specific sections of the NPPF, relating to the sustainability of the location, the suitability of the land use, the quality of the design and the provision of affordable homes, rather than consideration of the NPPF 'as a whole'.

The emerging Local Plan is currently under examination, and will therefore be assessed against the previous version of the NPPF and the previous method of housing need calculation.

As CDC's Local Plan housing target is less than 80% of the new standard method of calculation housing need number, CDC will be required to commence work on a new Local Plan ASAP, even once their emerging Local Plan is newly adopted.

The new Local Plan would remain up-to-date for 5 years, however, a 20% buffer over and above the adopted Local Plan housing target will be required to be provided from July 2026.

Other changes to the NPPF include added emphasis on brownfield land, development supporting the digital economy and decarbonisation, including reference to the aim of transitioning to net zero by 2050. There is a greater emphasis on renewables, low carbon and energy efficient technology such as heating systems. Social rented housing is given increased importance, as a specific category of affordable housing. There are also changes to the assessment of Green Belt proposals, however, this will not affect Chichester as there is no designated Green Belt land within the District.

Recommendation: This is an update report, to note only.

# Agenda 10

Examination of the Chichester Local Plan 2021-2039

Inspectors: P Lewis BA(Hons) MA MRTPI, J Ayres BA Hons, Solicitor

Programme Officer: Kerry Trueman, Programme Officer Solutions Ltd

Email: [programmeofficer@chichester.gov.uk](mailto:programmeofficer@chichester.gov.uk) Phone: 07582 310364

Examination web pages: <https://www.chichester.gov.uk/localplanexaminationtimeline>

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15 January 2025

Tony Whitty

Divisional Manager Planning Policy

Chichester District Council

Dear Mr Whitty

## **Examination of the Chichester Local Plan 2021-2039**

1. As we indicated at the conclusion of the examination hearings on 13 November 2024, we are writing to set out our thoughts on the Chichester Local Plan 2021-2039 (the Plan) at this stage, and the way forward for the examination. Our comments are based on all that we have read, heard and seen to date. However, we emphasise that the examination is not yet concluded and consultation on main modifications is still to take place. Therefore, these comments are without prejudice to our final conclusions on the Plan. We would like to take this opportunity to thank you and your colleagues for your constructive and helpful approach throughout the examination.
2. Overall, we consider that, subject to main modifications, the Plan is likely to be capable of being found legally compliant and sound. We will set out our reasoning for this in our final report.
3. During the hearing sessions a number of potential main modifications were discussed. The Council has kept a running list of all of these and has produced a number of potential main modifications within a number of documents. This letter is focused upon the matters discussed at the hearing which we said we would give further consideration to, and to the administrative arrangements relating to all potential main modifications. We also provide advice in respect of a number of issues that we said we would give further consideration to.

## **The process**

4. We have provided our comments on the Council's list of potential main modifications which were discussed at the hearing. You have been drafting further potential main modifications in following up the action points from the hearings. Please provide us with a comprehensive list of potential main modifications for our comment and agreement before it is made available for

public consultation. That list should include the main modifications we set out in this letter. The Council should also consider the need for any consequential changes that might be required in connection with any potential main modifications.

5. The Council has previously prepared lists of proposed additional modifications. Some of these were discussed as potential main modifications during the hearing. Any remaining additional modifications are a matter solely for the Council. If the Council intends to make any additional modifications these should be set out in a separate document from the main modifications. If the Council intends to publicise or consult on any additional modifications it should be made clear that such changes are not a matter for the Inspectors. Similarly, further changes to the Policies Map should also be published for consultation but for reasons explained previously, we are not examining the Policies Map.
6. We should note at this stage that the Procedure Guide for Local Plan Examinations states that further hearing sessions will not usually be held, unless the Inspector considers them essential to deal with substantial issues raised in the representations to the main modifications, or to ensure fairness.

### **Consideration of main modifications**

7. The views we have expressed in the hearing sessions and in this letter on potential main modifications and related policies map changes are based on the evidence before us, including the discussion that took place at the hearing sessions. However, our final conclusions on soundness and legal compliance will be provided in the report which we will produce after the consultation on the potential main modifications has been completed. In reaching our conclusions, we will take into account any representations made in response to the consultation. Consequently, the views we expressed during the hearing sessions and in this letter about soundness and the potential main modifications which may be necessary to achieve a sound plan could alter following the consultation process.

### **Next steps**

8. We would be grateful if the Council could confirm to us the timetable for the publication of the main modifications, and providing to us for review the comprehensive draft list of main modifications and related documents.

### **Potential main modifications and advice**

#### **Legal compliance – sustainability appraisal**

9. As we explained at the hearings, it is our role to determine whether a local plan (a) satisfies the requirements of section 19 of the 2004 Act and any regulations<sup>1</sup> under sections 17 and 36; and (b) is sound. This means that in regard to the sustainability appraisal, we need to be satisfied that the Council carried out a

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<sup>1</sup> Town and Country Planning (Local Planning) (England) Regulations 2012

sustainability appraisal of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under regulation 19. The Council did these things, and we are satisfied that you have complied with the legal requirements of the 2004 Act and the 2012 Regulations. Neither the 2004 Act nor the SEA Regulations require the Inspector to determine if the local planning authority complied with the SEA Regulations during the preparation of the Plan.

10. That said, the Council will need to be confident that it complied with the SEA Regulations and in that regard, we advise that the sustainability appraisal is organised and presented in such a way that it may readily be ascertained, without any paper chase being required, what strategic and other policy options were considered in earlier stages and why they had been rejected.
11. It is clear to us that the strategy of the Plan, and its broad distribution of development has been shaped during plan making which commenced in 2016. Whilst the proposed plan period of the Plan has evolved during the protracted plan making process, there has been one plan making process, and the sustainability appraisal before us is the latest iteration in a succession of documents. We are of the view that the preparation of the Strategic Flood Risk Assessment (SFRA) does not undermine the findings of the sustainability appraisal and the reasonable alternatives considered by the Council in the earlier stages of sustainability appraisal.
12. The Council should satisfy itself that it has met the requirements for sustainability appraisal by producing an addendum to the Sustainability Appraisal of the submitted Plan in relation to the potential main modifications, as appropriate. We will need to see a draft of the addendum and may have comments on it. The addendum should be published for consultation.

### **Strategic Flood Risk Assessment**

13. We have now considered the additional documents in relation to the SFRA and the responses received to our Inspector led consultation. At this point we are not minded to recommend any Main Modifications arising from these, or request that further work is undertaken. The Council should secure the formal views of the Environment Agency on these documents for our consideration prior to the main modifications being finalised.

### **Habitats Regulations Assessment**

14. The latest position in respect of the mitigation of the potential effects of ammonia deposition on the Mens SAC is set out in CDC18. Whilst it would appear that a breach of the critical threshold for ammonia is not expected to occur until towards the end of the plan period, it nevertheless is expected to occur within the lifetime of the Plan before us. Appropriate mitigation should therefore be made through this Plan to address this issue. We invite the

Council to provide us with the wording of a main modification to address this matter.

15. The Council should also consider whether the Habitats Regulations Assessment requires updating as a consequence of the main modifications and if so, carry out consultation accordingly.

**Whether the strategic policies of the Plan would look ahead over a minimum of 15 years from adoption as per paragraph 22 of the National Planning Policy Framework (NPPF)?**

16. NPPF22 says that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Given that the proposed plan period is for 2021 to 2039, the Plan would not look ahead 15 years from adoption. Depending upon the date of adoption, it would look ahead a maximum of 14 years.
17. In this respect, we have regard to a number of relevant factors. Firstly, the Secretary of State in her letter to local planning authorities (OD04) is clear in regard to plan making, that for plans currently at examination, the examination should continue, although where there is a significant gap between the plan and the new local housing need figure (via the proposed new standard method), the Government will expect authorities to begin a plan immediately in the new system. Consequently, there is a clear expectation by the Government in this regard that a new plan for Chichester should commence in the new system as soon as possible. The transitional arrangements in the revised NPPF also make this clear. This is in addition to the requirement for the review of local plans set out in Regulation 10A.
18. Secondly, there are a number of issues which may require an earlier review of the Plan. These include for example the issue of ammonia and the Mens SAC, the introduction of a monitor and manage approach to the highways issues concerning the A27, and, the matter of the extent, if any, of unmet housing and employment land need of neighbours, and in particular from the South Downs National Park, which will become known as the National Park Authority progresses its development plan.
19. Consequently, we consider it acceptable for the strategic policies of the Plan not to look ahead 15 years from adoption despite the inconsistency with one element of NPPF22. This will ensure that the Plan can progress to adoption and provide a significant boost to housing land supply, and the mitigation mechanisms by which matters such as those around the A27 capacity issues can be progressed.



## **The transport evidence base**

20. NPPF30 sets out that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
21. The Procedure Guide for Local Plan Examinations is clear that evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older. It goes on to say that as a minimum, any such documents should be updated as necessary to incorporate the most recent available information. But this may not be necessary for evidence documents on topics that are less subject to change over time, such as landscape character assessments.
22. In this case the Chichester Transport Study 2024 (TA03.01) was finalised in January 2024, and relates to the Regulation 19 version of the Plan. It is therefore a recent document which takes into account relevant national policy as set out in the NPPF and the Department for Transport Circular 01/2022, Strategic Road Network and the Delivery of Sustainable Transport, which was issued in December 2022. Furthermore, it takes into account the most recent available information. And, it is an assessment of the effects of the development proposed in the Plan before us. No alternative modelling has been offered by representors.
23. The Chichester Area Transport Model (CATM) relies on traffic analysis and outputs from a SATURN traffic model which was originally validated in 2014, and updated in 2018. It is acknowledged by the Council that the 2014 base year model utilises and is validated against traffic data and journey making patterns from that time. The Council acknowledge that the model is now old and that travel behaviour following the COVID-19 Pandemic has changed, with more home working, but with increases in other types of journeys on the road such as home deliveries. The Council is committed to updating the model at a very early stage as part of the monitor and manage process being developed going forward, particularly to inform appropriate mitigation measures.
24. In an attempt to verify the model, work has been undertaken by the Council to review current traffic flows and to compare them with modelled flows and also with observed flows from the model base year to strengthen the evidence base as far as is possible at this time. The transport modelling indicates that capacity issues will worsen through the plan period, taking into account existing commitments and development proposed through the Plan, albeit that the forecasts for 2031, are a good proxy for the likely conditions in 2039.

25. The baseline data for the CATM is not fully reflective of current conditions, such as travel patterns. The verification exercise however shows that the outputs of the model remain largely valid, and there is no alternative convincing evidence before us which indicates that the A27 junction capacity issues have appreciably changed for the better since 2014. Consequently, we take the pragmatic view that the transport modelling is in overall terms sufficiently adequate and proportionate to justify the strategic policy shift in the Plan to monitor and manage as set out in Policy T1. In so far as the transport modelling has influenced the proposed distribution of development in the Plan, given the known background traffic congestion conditions relating to the A27 junctions, we consider that it is adequate and proportionate for that purpose.

### **A27 Chichester Bypass Mitigation**

26. Through the examination, the Council has suggested a number of main modifications to Policy T1 (SD10.04). These include the definition of charging sectors and apportionment and averaging factors to be applied to the Target Contribution Level of £8,000 per dwelling (average) for development to contribute to the transport mitigation funding requirement in the south of the plan area. This has not been subject to consultation, and the views of interested parties on this are not therefore available to us.
27. The transport modelling undertaken for the Plan has been used to inform the cost apportionments, along with 2021 Census data and DfT National Trip End Model Car Ownership Forecasts. It is clear to us that the transport modelling is reaching the end of its useful life, and it is intended that it will be replaced by a new model in the short term. Consequently, the apportionment and averaging factors would need to be reconsidered in the context of the new model and the development of the monitor and manage approach. So, we do not find that the proposed inclusion in the Plan at this stage of the charging sectors and apportionment and averaging factors to be justified and nor are they necessary for soundness, and we do not intend to recommend a main modification to that effect. Furthermore, to do so would unnecessarily delay the adoption of the Plan.

### **Housing land requirement**

28. Whilst we have found that the evidence base in regard to transport is sufficiently up to date, adequate and proportionate, we have not been convinced that it justifies a housing requirement below Local Housing Need (LHN). There is not the clear evidence before us that any significant impacts from housing development, at development levels up to the LHN as calculated for the Plan, on the transport network (in terms of capacity and congestion), or on highway safety, cannot be cost effectively mitigated to an acceptable degree, nor are we convinced that such a level of development would give rise to unacceptable impacts on highway safety, or that the residual cumulative

impacts on the road network would be severe. Equally, there is not the evidence to demonstrate that a specific level of housing development above LHN would also be acceptable in transport terms.

29. Consequently, we do not find that there would be adverse transport impacts arising from meeting objectively assessed needs (OAN) which would significantly and demonstrably outweigh the benefits of meeting housing OAN in full. Or put another way, the evidence before us does not persuade us that a housing requirement of 90% of LHN is justified, whilst one at 100% would not be. Therefore, we do not accept that the application of NPPF11 b ii justifies a housing requirement below LHN.
30. Policy H1 should be amended so that the minimum housing requirement for the full plan period is a minimum of 11,484 dwellings, not 10,350 dwellings as per the submitted Plan, with consequential changes being made as necessary.
31. Paragraph 5.2 of the submitted Plan refers to 535 dpa applying in the southern plan area, and 40 dpa applying in the northern plan area. These figures have not been justified, and given they are not included in Policy H1 of the submitted Plan, would not be effective in this regard. A main modification should be made to delete these figures with consequential changes made as necessary.
32. The net completions of dwellings in the plan period to April 2024 is 2,326. Due to relatively high levels of housing delivery in the plan period to date, which has been well above LHN, the current supply of deliverable housing sites in the plan area has been somewhat depleted. We have no clear reason to doubt that the Council has identified a deliverable housing land supply for the five years starting in 2025 of around 2,381 dwellings, with around 634 completions anticipated in the current year.
33. The housing trajectory indicates that the level of housing completions would increase appreciably in the middle of the plan period, but would be lower short term, until the allocated sites and larger committed sites come forward. The five-year housing land supply inevitably is dependant to no small degree on existing commitments, and there is relatively little we can do through this Plan to boost housing land supply of developable sites significantly in the immediate term, especially without substantial delay to the adoption of the Plan, by when the housing land supply situation may have hardened further. There is also, amongst other things, the need for the monitor and manage approach to be put into place in the next few years to mitigate effects of new development on the A27. Therefore, in recognition of this, we consider that a stepped housing requirement is justified in this case.
34. The annualised housing requirement for the years 2021/22 to 2029/30 should therefore be 575 dpa. This figure is derived from the net completions to date, and net completions likely to arise from the identified five-year housing land

supply (including the assumed completions for 2024/25). That would ensure that there would be a marginal five-year supply of housing on adoption of the plan, including a 5% buffer. For the years 2030/31 to 2038/39 the annualised requirement should be 701 dpa to reflect the higher level of completions anticipated in the latter part of the plan period in the housing trajectory. A main modification should be prepared to amend Policy H1 accordingly and address any consequential changes.

35. The housing land supply identified in the Plan would provide for around 95% of the amended requirement for the plan period, sufficient for around 17 years of the 18 year plan period. Given the requirement in current national policy that Chichester should commence a Plan in the new system as soon as possible, and that the Plan is not the sole part of the development plan (as per the Council's Local Development Scheme which includes a possible Local Plan Site Allocation Development Plan Document) which is concerned with bringing forward land for housing, we do not require that the Council provides further land for housing through this Plan, as that would unnecessarily delay its adoption.
36. We discussed at the hearing those parts of Policy H1 relating to housing land supply and consider that to make the Policy effective they should be deleted, along with the broad spatial distribution figures. A simplified table should be inserted into the explanatory text to show the various elements of the anticipated housing land supply over the plan period, which may include the number of dwellings not presently being provided for (the 5% of the requirement referred to above).

### **Policy H6 Self-build and custom housing**

37. Submitted Policy H6 includes that new sites over 200 units which are allocated in the Local Plan will be required to provide self and custom build serviced plots as set out in the relevant site-specific allocation policies, and in all other instances 2% of market units provided on strategic scale housing sites should be self-build and custom housing. The Council has suggested main modifications to increase this to 5%.
38. The Council's Self and Custom Build Note (H13) identifies that demand for self-build and custom build homes is up to 53 dwellings per annum. It also identifies that windfall provision accounts for around 28 dwellings per annum on average. In principle, this justifies the Plan seeking to secure provision of custom and/or self build plots through sites of over 200 dwellings and the strategic scale housing allocations. Given that the requirements of Policy H6 would apply only to large and strategic scale sites which do not yet have planning permission, and having regard to the amount of new dwellings anticipated to come forward from those sources, the 2% requirement set out in the submission local plan would have little effect on meeting the residual need

beyond that arising from windfall sites. Therefore, we are content that the proposed figure of 5% as set out by the Council is justified. In reaching this view we have taken into account the policy requirement for marketing such plots and that they can revert to conventional market housing if unsold after 12 months.

#### **Policy E4 Horticultural Development**

39. Further to the discussion at the hearing and receipt of the statement of common ground on 27 November 2024 (PS/SC15/16a), we are broadly content with the Councils suggested main modifications as amended.

#### **Policy NE4 Strategic Wildlife Corridors**

40. In respect of Policy NE4, we note that modifications are proposed to remove reference to the sequential test and support this approach. Moreover, the interpretation of 'integrity' would appear to be sensible and ensure that the policy is effective and unambiguous.
41. We acknowledge that there is some inconsistency between the approach of the Council and the Parish Councils in respect of the exact definition of strategic wildlife corridors, with particular regard to the width and size of the identified corridors, and the acceptability of development within proximity to the corridors. It should be made clear within the Plan whether the approach to strategic wildlife corridors is a strategic approach, which would allow other planning documents to refine exact boundaries, or whether the boundaries set out in the local plan are intended to be strictly interpreted for the purposes of directing development.

#### **Policy A12 Chidham and Hambrook**

42. In respect of Policy A12, it was discussed at the hearing sessions whether the wording of the policy should be amended to recognise that the development within that policy is largely committed, and to provide clarity as to the further extent of housing which should be brought forward. As submitted the Policy is not justified or effective as it purports to require land to be allocated when the level of such housing has in effect been met.
43. We appreciate the comments made that the policy would be necessary should the committed development fail to come forward in full, and accept the desire to retain it for the sake of completeness. However, the Policy and explanatory text should be amended to make it clear that sufficient land has already been committed to meet the 300 dwelling allocation, and that the policy would apply in the event that different schemes were to come forward rather than those committed.

## **Policy A13 Southbourne Broad Location for Development**

44. Similar to Policy A12, Policy A13 should be amended to make clear the residual number of dwellings which should be planned for in the Southbourne Allocation Development Plan Document to ensure that the policy is effective and factually correct.

### **Conclusion**

45. 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. The Council is responsible for any amendments to its Policies Map and for undertaking consultation on 'additional modifications'. We look forward to reviewing these documents in due course, prior to consultation on main modifications.
46. On receipt of this letter, the Council should make it available to all interested parties by adding it to the examination website. However, we are not seeking, nor envisage accepting, any responses to this letter from any other parties to the examination.

Yours sincerely

*J Ayres    P Lewis*

INSPECTORS