



Sustainability Appraisal of the Chichester Local Plan: Key Policies 2014-2029

Post Adoption Statement

July 2015

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1. Introduction

- 1.1 Following the Planning Inspector's Report to Chichester District Council (CDC) on the 18th May 2015, the Council adopted the Chichester Local Plan: Key Policies 2014-2029 on 14th July 2015.
- 1.2 The plan's preparation has been accompanied by a Sustainability Appraisal (SA) process, which also meets the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.3 In accordance with Part 4 of those regulations, this statement sets out:
- (a) how environmental considerations have been integrated into the plan;
 - (b) how the environmental (SA) report has been taken into account;
 - (c) how opinions expressed in response to consultations on the Sustainability Appraisal have been taken into account;
 - (d) the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with; and
 - (e) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

2. How environmental considerations have been integrated into the Chichester Local Plan

- 2.1 The Chichester LP has gone through a number of stages in its preparation, these are detailed in the table below. Each of these stages has been accompanied by an SA report that identifies the environmental and wider sustainability issues affecting the options for plan development, and ultimately the submitted and adopted plan policies.

Stages	Documents produced	Date
Stage 1	Sustainability Appraisal Scoping Report	June 2008
Stage 2	Initial Sustainability Appraisal of the 'Core Strategy: Focus on Strategic Growth Options choices for major development in Chichester District 2011 – 2026'	January 2010
Stage 3	Sustainability Appraisal of the 'Housing Numbers and Location Consultation' Document	August 2011
Stage 4	Initial Sustainability Appraisal of the 'Chichester Local Plan Draft Local Plan Key Policies – Preferred	March 2013

Stages	Documents produced	Date
	Approach' document	
Stage 5	Additional Sustainability Appraisal of the proposed changes to the 'Draft Local Plan Key Policies – Preferred Approach' document	July 2013
Stage 6	Sustainability Appraisal of the 'Chichester Pre-Submission Local Plan'	October 2013

2.2 Stage 1, the scoping report, sets out the environmental baseline issues and data for the plan area, and on the basis of these identifies a SA framework for assessing options as they develop in the subsequent stages 2-6 and so identify the environmental considerations which may be taken into account in the next stage of plan preparation.

2.3 The SA reports set out the policy options which have been considered through the various stages of plan preparation and their predicted implications for sustainable development, including environmental issues. The SA reports are used to inform the decision making process, thus integrating environmental issues into the plan policies. However the SA assessments were not intended to determine decision making on their own, other planning factors were also taken into account in option selection and decision making. The reports also help to inform the public response to the consultations before the submission stage version was prepared.

3. How the Environment Report (SA reports 2010-2014) has been taken into account

3.1 The initial SA of the "Focus on Strategic Growth Options" consultation document (FoSGO, January 2010), together with Habitats Regulations considerations, resulted in the elimination of strategic development locations to the South West of Chichester, to the West of Chichester and at Fishbourne as options to go forward into the next stage consultation which was "Housing Numbers and Locations" (August 2011). This was on the grounds of lack of capacity at Apuldram waste water treatment works (WwTW) and consequent impacts on Chichester Harbour Special Protection Area (SPA) and secondly recreational disturbance impacts on the harbour SPA. In addition the lack of facilities and infrastructure at Fishbourne was also highlighted as an issue.

3.2 Since that consultation in 2011, further work through the Solent Disturbance and Mitigation Project (SDMP) has reduced uncertainty on recreational disturbance issues and is leading to a mitigation strategy being developed Solent-wide. The South West Chichester and Fishbourne

locations could still be too close to the harbour for mitigation measures alone to be effective, but a range of measures at West of Chichester may well reduce the impact to acceptable levels (both from the site considered alone and in-combination with other sites). At the same time a proposal emerged for development at the West of Chichester location to deliver a waste water treatment solution in the form of a long sewage pipe around Chichester to connect to alternative WWTW at Tangmere. These two factors resulted in the re-inclusion of West of Chichester as an option at the preferred approach stage. Since that point, an on-site sewage treatment plant has become a possibility, but this would not have altered the justification for re-inclusion.

3.3 A large area of South West Chichester is within the Environment Agency flood zones 2 and 3, extending through the middle of the site, excluding a substantial area from potential development. The impact of strategic development at South West Chichester would have an adverse visual impact on the AONB. There are concerns regarding the impact of the scale of West of Fishbourne strategic development on the character of the village, the location of the site in the open countryside and the visual impact from the SDNP and the surrounding landscape.

3.4 The options examined in the preferred approach document were developed in part through early face to face meetings between the planning policy officers who were to draft policies and the SA team. The results of these discussions were then transferred to a spread-sheet record of early options considered. The SA process increased the range of options explored and discussed at this early stage. In addition, for some policies, planning policy officers themselves kept a pro-forma record of options considered, this information was also added to the spread-sheet. From there, some similar options were combined and then un-implementable and unfeasible options were ruled out and not considered further. Full records of this process have been kept and form part of the background evidence for the final SA report. The remaining options were assessed and the results of that process are presented in the final SA report.

3.5 The findings of the Initial SA report were presented to the Council's Development Plan Panel meeting on 21st February 2013, and considered by Members. The report was then considered alongside the Local Plan Preferred Approach document by Cabinet and by Council on the 11th March 2013. The same meetings also approved the SA report as being suitable for public consultation.

3.6 The “Local Plan Key Policies – Preferred Approach” document chooses one option for each policy area based on: the options considered in the early stages of plan development; the options assessed in the SA report; and on other evidence and background studies. However for each policy area changes between options and changes to options to improve any negative impacts (called mitigation) were both possible. Mitigation has largely occurred through minor changes to policy wording in the early stages of the SA process, and further recommendation for mitigation over and above the options presented in the accompanying SA report were not included in the submitted SA report.

3.7 Following consultation responses, some further changes to policy options and the SA were proposed and consulted on between July and September 2013. These were mainly based on the public consultation responses and were informed by but not determined by the SA report findings.

4. How opinions expressed in response to consultations on the Sustainability Appraisal have been taken into account.

4.1 For each of the 6 stages in Table 2.1, the SA report has been subject to public consultation, which included the statutory consultees (the Environment Agency, Natural England and Historic England (formerly English Heritage)).

4.2 Where consultation responses specific to the SA reports were received these were recorded on the local plan consultation database (Objective) and each one was specifically addressed and reported back to the Development Plan Panel. Where appropriate, changes were incorporated into the next version of the SA report or the next draft of the Plan itself, depending on the nature of the comment.

5. The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.

5.1 The spatial distribution of housing has been the most important single issue that the plan preparation process has wrestled with. Section 3 of this statement above summarises the alternatives considered, the SA findings on these options and how the final plan as adopted was chosen from these alternatives.

5.2 The level of development, particularly housing numbers was also a key issue in terms of environmental impact and a variety of options were

considered for the overall level of development and for its distribution between Chichester City and the 'Hubs'. In the adopted plan, the level of housing is less than the objectively assessed need (OAN) due to the limitations of the transport model and the uncertainty over the provision of waste water and transport infrastructure.

- 5.3 The Inspector's Report of the Examination into the Chichester Local Plan states that that "*The emergence of the strategy through the preferred approach to the submitted Plan has been informed by Sustainability Appraisal (SA) as part of an iterative process.*" [para 13] and that "*Early proposals to locate strategic development to the south west and west of Chichester and at Fishbourne were discounted due to their environmental impact on the Chichester and Langstone Harbour Special Protection Area (SPA). Subsequently a mitigation strategy for recreational disturbance was developed and a solution to address the issue of waste water treatment emerged. This led to the strategic location for development West of Chichester being re-introduced. However the SA report makes it clear that no such justification exists to re-introduce South West of Chichester or Fishbourne as locations for strategic development*" [para 14].
- 5.4 On the overall spatial strategy the Inspector comments in her report that "*It focuses development along the "East-West Corridor" between Southbourne and Tangmere and around Chichester city. The concept of this "corridor" as a focus for development emerged from considerations of transportation, access and the sustainability of existing settlements as well as consideration of environmental issues, underpinned by the SA process.*" The option selected was considered to be that with least environmental impact compared to the realistic alternatives.
- 5.5 For all policies at least two options were considered in detail by the SA process. This information was reported to Members and senior officers to inform their decision making. Graphical representations of the profile of impacts, positive and negative, are used to convey what is often complicated information – only occasionally is one option clearly better than alternatives on all sustainability objectives. The options chosen for the adopted plan is the one considered by those decision makers to be the most sustainable for Chichester District (excluding the South Downs National park) taking the SA findings, national planning guidance and consultee responses into account.

6. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

6.1 Now that the plan is adopted, the monitoring aspects of the SA framework will come into use, primarily through the Monitoring Framework of the Local Plan. The monitoring indicators originally set out in the 2008 scoping report have in many cases ceased to be collected, or have changed due to the shifting needs for data in the last five years and the reduction in resources available for data collection across central and local government. Wherever possible the same data areas are covered in the monitoring framework of the Local Plan. The framework's indicator set was checked by the SA team to ensure it covered the list of topics required by the SEA directive. These indicators will be used in the Annual Monitoring report (AMR) of the local plan which will be the primary monitoring mechanism for the SA process.

6.2 The monitoring framework of the Local Plan includes the following indicators (amongst others) that will be important in monitoring of the SA objectives in the implementation of the Local Plan:

- Amount of additional employment land (B uses) developed by type
- Amount of floor-space for 'town centre uses' developed by type within and outside centres
- New homes built each year (net)
- Affordable homes built each year by type and as a percentage of all homes built
- Extent of areas of biodiversity importance: Designated sites and BAP priority habitats
- Air Quality Management Areas Nitrogen Dioxide levels
- Conservation Areas with Character Appraisals