

To Chichester District Council

Local Plan Review

Birdham Parish Council comments on the Draft Interim Policy Statement for Housing Development issued by CDC.

**Sustainability Appraisal**

Comment - There should be a reference to the Sustainability Appraisal within the IPPS because it is mentioned three times in the CLPKP: (Chichester Local Plan Key Policies 2014 – 2029)

From the Local Plan Review, Preferred Approach

“1.39 The Plan has been subject to a Sustainability Appraisal (SA) which is integral to each stage of the plan making process. The SA assesses the impact of the Local Plan Review’s objectives, policies and sites having regard to social, environmental and economic factors and helps to ensure that the local plan accords with the principles of sustainable development. The Local Plan Review is also supported by a number of assessments that form part of the continual review process, which include the Strategic Environmental Assessment; Habitats Regulations Assessments; and Equality Impact Assessments to evaluate the sustainability of the proposed strategy, policies and proposals.”

“4.4 The Local Plan Review strategy has been shaped by a range of factors including:

• The sub-regional planning context, in particular the Local Strategic Statement (LSS2) for West Sussex and Greater Brighton;

• The overall vision and objectives for the plan area and for the different sub-areas and settlements within it;

• The pattern of need and demand for housing and employment across the area;

• Infrastructure capacity and constraints, in particular relating to wastewater treatment,

roads and transport;

• Environmental constraints – avoiding flood risk areas, protecting environmental designations, landscape quality, the historic environment and settlement character;

• The availability of potential housing sites, their deliverability and phasing;

• Public consultation and the sustainability appraisal of options and policies.”

“6.3 The selection process as described above, helped to identify the broad locations that offered particularly suitable locations for development which have subsequently been tested in detail through Sustainability Appraisal, Habitats Regulation Assessment, Transport Assessment, Infrastructure Delivery Plan and Landscape Study. The content of responses to earlier stages of consultation has also been taken into account.”

Comment - The Sustainability appraisal is therefore a key document upon which the CLPKP has been formulated and this must be emphasised in the IPPS.

**HELAA**

The Chichester District Council Housing and Economic Land Availability Assessment Agust 2018 states clearly that:

“The HELAA only identifies sites. It does not allocate sites for development. The allocation of sites for future housing or economic development will be determined through the Local Plan Review, Site Allocation Development Plan Documents or through neighbourhood plans.

“The identification of potential housing and economic development sites within the HELAA does not mply the Council will grant planning permission for residential or economic development. All planning applications for housing and economic development will continue to be considered against the appropriate policies in the development plan and have regard to any other material considerations.”

Comment - This seems to be in conflict with the statement 6.2 in the IPPS which states that inclusion in the HELAA provides evidence that the site is acceptable. The IPPS should make clear the inclusion in the HELAA is not a material planning consideration.

Please don’t hesitate to contact me should you require further elucidation.

Yours faithfully,

Imogen Whitaker

Clerk to Birdham Parish Council