Response to Draft Interim Policy Statement for Housing Development.

Sustrans and the Chichester and District Cycle Forum welcome the opportunity to respond to this draft Policy statement.

First, our organizations believe that it is totally unrealistic to be required to increase housing land availability at a time when the housing industry has been crippled by the COVID -19 crisis. We ask that the Council requests that the Government’s Planning Policy Guidance be put on hold and that Councils in a similar position as CDC , where a Revised Local Plan is in preparation and likely to be subject to a public examination within 12 months be allowed to continue with its current adopted housing target of 435 houses per annum instead of the proposed artificial target of 628 which has not been subject to scrutiny through a public inquiry. The Government’s own reassessment of the country’s new ‘normal’ may locally require total revision to its current planning guidance. For instance the freeing up of vacant town centre properties from planning controls to conversion to residential properties will produce a new supply chain which should be allowed to be effective before further greenfield land release is allowed in a non planned manner. This is the immediate danger in forcing the Council to increase land supply by over 45% on 15th July.

There are many unimplemented planning permissions, and local plan allocations which need to be developed before an uncontrolled release of land of this order which will have inevitably serious environmental and infrastructure implications for many years to come. Two current sites provide good illustrations of how housing supply can be increased without such dire effects. First, land at Plainwood Close in Chichester has been proposed for housing since the mid 1990’s. It has taken the applicant since then to prepare a satisfactory layout. The Council should immediately prepare a CPO to bring this site forward. Second the Local Plan allocation of land West of Chichester, is progressing extremely slowly and it may well not be able in its entirety to be counted against the five year supply target as only half the site has any form of permission. Again the Council needs to use all its powers , as it has done on the sites west of Tangmere, to bring this site to fruition. This is mentioned in para 2.4 of the Policy Statement but we are not seeing any proactive action by the Council, or WSCC ,to bring forward the completion of houses. We welcome the statement in paras3.1 to give primacy to sites which are sustainable. In para 4.3 we applaud the efforts to stop land banking by limiting new outline permissions to 2 years. However we fail to see how this will prevent renewals of such permissions extending the periods of land lying in a fallow or derelict state. Should there not be a commitment to review such unimplemented permissions through the revision of the Local Plan ?

In terms of the proposed Statement we welcome the inclusion in Section 8 of the West Sussex Cycling Design Guide but ask that this is regarded as the basic standard required rather than seen simply as an aspiration or guide as has happened at West of Chichester. The Government’s recent publication of its Transport Decarbonizing Plan is more than adequate justification of the need for mandatory minimum standards rather than ‘guidance’ which will simply be ignored when thought expedient.

In Section 10 reference needs to be made to WSCC Walking and Cycling Strategy2016- 2026 which provides details of cycling routes which need to be protected or brought forward as part of housing proposals. We would also welcome reference to the draft LCWIP for Chichester which is nearly complete. More fundamentally the policy needs to be made stronger by replacing ‘should’ by ‘will’ and delete ‘where appropriate ‘.

Our two organisations hope that these comments are seen as supportive of the Council’s need to comply with Government guidance which in our view needs urgent revision.

Ian Sumnall

Martyn Chuter

8th July 2020