Mr Toby Ayling

Planning Policy Divisional Manager

Chichester District Council

East Pallant House

East Pallant

CHICHESTER

Sussex

PO19 1TY 6 July 2020

Dear Toby

**Consultation: Draft Interim Policy Statement for Housing**

Thank you for your (undated) letter inviting Chichester Conservation Area Advisory Committee (CCAAC) to comment on the above.

**General.** Most of the likely development sites covered by the policy will lie outside the Conservation Area, but even so could have the potential to affect its setting and cause knock-on effects on the city’s already over-loaded infrastructure. Indeed the inability of the road network and waste water treatment facilities to take any more large-scale housing developments does require urgent and significant infrastructure investment to be made.

Comments upon particular clauses are as follows:

**2.4 Priorities**. This policy does include the one already-identified large development site that is within the Conservation Area, namely Southern Gateway which we note is now classed as a ‘long-term site undergoing testing’. We were given to understand that the preferred bidder for developing this site had been selected just before Christmas 2019, but this implies the contract may not have been awarded, especially as no public announcement has been made on this score. This is a site about which CCAAC has grave concerns, especially as so many listed and locally-listed buildings are likely to be affected; it is an area where heritage and design considerations should be paramount.

**4. Local Context**

4.2 The policy of requiring sites to be deliverable at the time of the planning application and not be dependent on ‘significant off-site infrastructure,’ is a sensible one as it would avoid a repeat of the ridiculous situation with Whitehouse Farm where the problems of sewage disposal had not been properly examined other than acknowledging that Apuldram waste treatment works could not take the extra loading.

4.3 We note it will be policy that when planning permission is granted for a housing development such permission will be conditional upon the building work commencing within two years. This too is sensible as it could help to discourage land-banking.

4.6 We note that new development being ‘sustainably located with respect to adjoining settlements, and of a scale and density that is appropriate’ will be a policy. This is a very important issue and there must be no compromising when applying it. It is essential that there is no repeat of what happened on the former Geoffrey Osbourne site adjacent to the canal basin where the inappropriate scale and massing of the John Rennie Road development was permitted despite its blatant non-conformance with the criteria set out in the Council’s then master plan for the Southern Gateway Area.

4.7 In the ‘other respects’ policy one criterion missing is access to/facilities for public transport – an essential consideration for sustainability.

**8 Environmental** Again access to/facilities for public transport have been overlooked.

**9 Design Quality** The policy on ensuring high quality of design that respects and enhances the existing character of settlements, and delivering ‘high architectural and built quality’ is welcomed, but as with 4.6 above it is essential that this quality is actually delivered. This was another failing with the John Rennie Road development where dull, uninspired design and use of poor-quality materials in a prominent and sensitive site within the Conservation Area was permitted with regrettable consequences.

**10 Accessibility** Whilst this policy mentions the importance of vehicular, pedestrian and cycle links, yet again access to/facilities for public transport have been overlooked.

CCAAC respectfully ask that these views be taken into considerations when finalising the Interim Statement.

Yours Sincerely (signed)

A H J Green

Chairman