Chichester Harbour Trust

PO Box 327

Chichester PO19 1ZN

Mr Andrew Frost

Head of Planning Services

Chichester District Council

East Pallant House

Chichester

10 July 2020

Dear Andrew,

**Chichester District Interim Policy Statement for Housing Development**

The Chichester Harbour Trust welcomes the production of an Interim Housing Policy as a safeguard measure to encourage sustainable housing development in the period until the new Local Plan for Chichester is published. We understand that the Statement is intended to provide guidance and is not a statutory document.

In particular, we are concerned that interim housing development should not have an adverse impact on the landscape, character, ecology and setting of the Chichester Harbour AONB, SSSI and SAC designated area, in the absence of the revised Local Plan for Chichester.

We support the consultation responses submitted by SOSCA, and that of Chichester Harbour Conservancy.

We are keen to emphasise the following points:

* In general, we hope that forthcoming planning applications will not pre-empt the proposed allocation sites which have not yet been adopted in the LPR particularly at AL7 Highgrove Farm, Bosham and AL6 at Apuldram.
* Proposed developments should be in sustainable locations in relation to long-term flood risk and sea level rise, recognising that the coastal settlements in Chichester District will face significant flood risk by 2065. In October 2019, the House of Commons Environment Food and Rural Affairs Committee urged local authorities to take a more proactive approach to planning in coastal areas and avoid inappropriate development in areas at risk from future flooding or erosion.
* We are keen to emphasise the need to prioritise available brownfield and retail land now in the future for development over greenfield sites, given the economic trends and projections particularly in the retail sector.

On specific points:

*4.2 Given that the Council is concerned about the potential shortfall in housing supply, sites put forward under this approach should be “deliverable” at the time that the site is put forward for planning permission.* Deliverability should take account of a development’s ability to demonstrate nitrate-neutrality and not add to existing capacity issues at the relevant Waste Water Treatment Works.

*4.5 Sites should be sustainably located in relation to existing settlements.* We support this where there would demonstrably be no impact on the context and setting of the Chichester Harbour AONB and preserving viewsheds between the AONB and South Downs National Park.

*4.6 Sites should be of a scale and density appropriate to the adjoining settlement.* We welcome the consideration that higher-density developments may be permitted as this potentially reduces the requirement for greenfield land. In so far as the design and scope are appropriate for the local development context and character.

6.2.3. *Landscape gaps*. We welcome the requirement that development must fall within an existing settlement, or adjoin or be directly adjacent to the boundary, in so far as this should not adversely affect the interconnecting landscape views between the AONB and National Park, and does not lead to the inadvertent coalescence of settlements in the East-West corridor. Evidence is provided by the Chichester Harbour Conservancy and South Downs National Park joint Priority Views Study 2019.

6.2.4. *Efficient use of land*. We welcome the inclusion of this paragraph to maximise the efficient use of available land to avoid low-density and piecemeal development through the sub-division of land parcels, such as was permitted recently at Highgrove Farm, Bosham. In addition, brownfield sites and re-allocated retail land should be given priority for planned development in this time.

6.2.5. *Landscape Character*. We welcome the inclusion of this paragraph to protect the long-distance viewsheds between the AONB and National Park. The Evidence list should include the recent joint Chichester Harbour Conservancy and South Downs National Park report on Priority Views.

6.2.6. *Strategic Wildlife Corridors*. We are concerned that any development might be permitted within the proposed Strategic Wildlife Corridors as this is likely to inherently affect the integrity of the SWC designation.

6.2.7*. Infrastructure*. The Local Planning Authority should apply critical analysis to the evidence supplied by the waste water treatment provider given their record on managing this infrastructure (In court in March 2020, Southern Water pleaded guilty to 46 charges of contravening the requirements of an environmental permit and five charges of “causing poisonous/noxious/polluting matter/waste to enter controlled waters.”)

6.2.11. *Flood Risk*. There is an argument that any development on the coastal plain is incompatible with future sea level rise and that on-site mitigation measures alone will not be sustainable in the long term. The NPPF states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).”

6.2.12. *Nitrate Neutrality*. We welcome the inclusion of the requirement for developers to comply with the emerging Natural England approach to achieving nitrate neutrality.

The Chichester Harbour Trust is dedicated to the protection of the unique qualities of Chichester Harbour Area of Outstanding Natural Beauty, and we welcome the opportunity to continue to be engaged with the Chichester Local Plan Review process.

Yours sincerely,

Nicky Horter

Trust Administrator

Chichester Harbour Trust