



CLAREMONT

PLANNING CONSULTANCY

Planning Policy Team
Chichester District Council
East Pallant House
1 East Pallant
Chichester
West Sussex
PO19 1TY

9 July 2020

Dear Sirs,

RESPONSE TO CONSULTATION ON INTERIM POLICY STATEMENT FOR HOUSING

Claremont Planning Consultancy Ltd (Claremont Planning) has been instructed on behalf of Southern & Regional Developments (S&R), to provide representations to the consultation currently being undertaken by Chichester District Council (the Council) on the proposed Interim Policy Statement for Housing (the IPS).

Claremont Planning has reviewed the draft Interim Policy Statement and recognises why the need for such a Statement has arisen. The timescales anticipated for the preparation and adoption of the Local Plan Review are clearly longer than was previously thought to be the case, and in the short term the Council will be in a challenging position with regards to the requirement to demonstrate and maintain a five-year housing land supply. This is despite housing delivery exceeding the Council's housing requirement in recent years, confirming that it is an issue with insufficient allocations rather than sites not delivering as expected. In order to address this, the Council has opted to be proactive through the preparation of this IPS, which is an approach that is supported by Claremont Planning and S&R.

The IPS provides criteria which the Council consider represent 'good quality development', and subject to the Framework's presumption applying, will support applications that fulfil the criteria set out. This includes matters such as boundaries contiguous with an identified settlement boundary, ensuring development will not lead to coalescence, making efficient use of land, high standards of construction and protecting environmental quality. The effect of the IPS will assist in enabling the early delivery of allocations proposed in the emerging Local Plan, and other sites that are deemed sustainably located on the edge of settlements.

The IPS as currently drafted does not set out whether the Council will expect 'good quality development' to fulfil all the criteria outlined or whether development on sites that meet most but not all criteria may also be supported by the Council. In the context of an inability to demonstrate a five-year housing land supply and the application of the Framework's presumption, in order for the IPS to be effective it is essential that the Council apply the IPS with some flexibility to recognise opportunities for sustainable development and support such applications accordingly. The application of a planning balance assessment by the decision maker is advocated through the Framework, critically recognising that to meet housing requirements and improve the delivery of new homes, not every site can always deliver every requirement to the same degree. The IPS should recognise this and avoid a tick box assessment process that circumvents the application of good planning judgement.

As such, the criteria should be clarified as having varied importance subject to site characteristics/location, especially in circumstances when a development would deliver wider

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benefits that support the grant of planning permission on their own merits. It is therefore recommended that the IPS is amended to include text that confirms it will be applied with some flexibility and that each site would be assessed on its own merits on a site-specific basis. This would better reflect the provisions of Paragraph 9 of the Framework which directs decision-makers to take local circumstances into consideration when guiding development towards sustainable solutions and advises that applications should not be determined based upon a criteria relating to the economic, social and environmental objectives of the Framework.

Of most importance in terms of the application of the IPS is the presumption in favour as set out by Paragraph 11 of the Framework, which advises clearly that when determining such applications, they must be judged against the Framework's policy. This will remain the case despite the proposed IPS, with the proposed document unable to be considered as an up to date policy document through which development could be specifically resisted.

Whilst the IPS may encourage applicants to come forward and pursue applications on emerging allocations ahead of the Local Plan being adopted, there can be no certainty of this. Equally, the Council may still be subject to speculative applications if there remain insufficient sites to demonstrate a five-year housing land supply. The IPS cannot defend against such speculative applications given the housing supply position and lack of up to date development plan, moreover it should be used to identify when such proposals would be acceptable and limit the contestation in relation to such proposals.

Claremont Planning and S&R do have concerns however that the Council has in the preparation of previous Local Plans, not sought to identify sufficient sites that would enable the Council to maintain a supply for the duration of the plan period. In this case, the current Local Plan should have dealt with the plan period to 2029 but failed to allocate sufficient sites and has resulted in the Council needing to prepare the IPS. Similarly, the Council prepared the Facilitating Appropriate Development document in 2011, to assist in determining planning applications ahead of adopting the Local Plan which was emerging at that time. The effectiveness of this approach is therefore questioned given that it is being resorted to again and Claremont Planning would advise that identification of further housing allocations would be more effective in presenting a longer term approach to addressing housing supply requirements. Given the ongoing preparation of the Local Plan Review, it is important that the Council recognise the previous shortcomings of plan preparation and develop an appropriate strategy that will allocate sufficient sites with an increased buffer that can be more effective at maintaining housing delivery across the plan period. If the Council does not do so, then repeated housing supply deficits are likely to occur with further speculative applications addressing housing need rather than a plan-led approach..

We trust that this is helpful and these representations are taken into consideration as the Council moves to adopt the Interim Policy Statement for Housing as policy later in 2020. If the Council wish to discuss any matters with Claremont Planning we would be happy to assist and can be contacted on the details below.

Yours sincerely,



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