



# COUNTRYSIDE

Places People Love

8 July 2020

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

By email only to: [planningpolicy@chichester.gov.uk](mailto:planningpolicy@chichester.gov.uk)

Dear Sir / Madam,

## Consultation on draft Interim Policy Statement for Housing Development

Thank you for inviting us to submit representations on the draft Interim Policy Statement for Housing Development (IPS). I write on behalf of Countryside Properties (UK) Ltd, who are the Council's appointed development partner for the Tangmere Strategic Development Location (SDL). I set out our comments on the draft IPS below, with reference to specific paragraph numbers in brackets.

Having reviewed the draft IPS, Countryside supports the overall approach taken by the Council in the IPS and its use for development management purposes until the Local Plan Review is adopted (para 1.3). Countryside also agrees that, whilst the relevant housing policies contained within the adopted may be deemed 'out of date' from 15 July 2020, the Chichester Local Plan: Key Policies 2014-2029 should continue to provide the basis for the consideration of planning applications for development within the Plan area (para 3.4), along with any made Neighbourhood Plans that form part of the development plan, including the Tangmere Neighbourhood Plan. It is also right that appropriate consideration be given to the weight of the draft policies in the emerging Local Plan Review at the time of the application, in accordance with paragraph 48 of the NPPF (para 3.6).

In respect of the draft Interim Housing Policy Statement itself, as set out in Section 6 of the consultation document, our only specific comment is in relation to paragraph 4, which seeks to make the best and most efficient use of land, and deter the artificial sub-division of larger land parcels.

Whilst it is understood that the purpose of the IPS is to guide development where applications come forward on unallocated sites, it remains imperative that future applications and development relating to the existing SDLs comes forward in a comprehensive manner, as emphasized by CLPKP Policy 7, in order to:

- Provide certainty over delivery of the infrastructure requirements for the planned residential development;
- Guarantee that such infrastructure will be delivered in a cohesive and coordinated manner; and
- Ensure best and most efficient use is made of the existing Strategic Development Locations, and delivery of residential development maximised.



# COUNTRYSIDE

Places People Love

Once the NPPF presumption in favour of sustainable development begins to apply, this would apply equally to applications on all relevant sites, including the existing SDLs. The Council should therefore make clear that the IPS is not designed to undermine the comprehensive planning approach for strategic sites, which is fundamental to the spatial strategy for both the adopted and emerging local plans.

As the Council is aware, piecemeal development would be prejudicial to the proper future development of the existing SDLs and would not accord with the policies in the adopted Local Plan. It is for this reason that the Council is progressing a Compulsory Purchase Order for the Tangmere SDL. To provide clarity for applicants and other parties, the IPS should therefore also make specific reference to the continued need for comprehensive development in such circumstances.

It is therefore recommended that paragraph 4 of the draft IPS be amended as follows (new text underlined):

*"4. Development proposals make best and most efficient use of the land, whilst respecting the character and appearance of the settlement. The Council will encourage planned higher densities in sustainable locations where appropriate (for example, in Chichester City and the Settlement Hubs). Arbitrarily low density or piecemeal development such as the artificial sub-division of larger land parcels will not be encouraged. Piecemeal development of land within the existing Strategic Development Locations which fails to deliver comprehensive development will not be acceptable."*

*"Relevant policies include:*

- *CLPKP Policy 2 Development Strategy and Settlement Hierarchy*
- *CLPKP Policy 7 Masterplanning Strategic Development*
- *CLPKP Policy 33 New Residential Development*
- *CLPKP Policy 47 Heritage and Design*
- *LPR Policy S2 Settlement Hierarchy*
- *LPR Policy DM3 Housing Density*

*"Relevant evidence includes:*

- *Settlement Hierarchy Background Paper"*

I trust the above comments are helpful. Please do not hesitate to contact me if you would like to discuss our comments further.

Yours sincerely

**Ellen Timmins MRTPI**  
Senior Planning Manager

M: 07557 213158

E: [ellen.timmins@cpplc.com](mailto:ellen.timmins@cpplc.com)

CC: Toby Ayling, Planning Policy Manager, CDC  
Hannah Chivers, Principal Planning Policy Officer, CDC