

Our ref: MA/HHL/003-1/L001m

Your ref: HHL DRAFT IPS FOR HOUSING DEVELOPMENT



Date: 09 July 2020

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

Dear Sir / Madam,

### **Representations in respect of Draft Interim Policy Statement for Housing Development.**

We write to you in respect of the consultation process in respect of the Council's Draft Interim Policy Statement for Housing Development (hereinafter referred to as the "Draft IPS"). This representation is made on behalf of Heaver Homes Ltd which has considerable land interests within the district including several parcels which are located in close proximity to settlements with a range of shops, services and good access to public transport.

We understand that the document has been drafted to essentially inform decision-making in the interim period between the current point (with an out-of-date Development Plan that fails to evidence an adequate deliverable housing land supply) to the point where the emerging Local Plan Review can be adopted. However, this conclusion does not align precisely with the statement at paragraph 2.3 which frames that the status of the Draft IPS could be rescinded at any point where the Council could show a suitable housing land supply position.

It is implicit that the preparation of the Draft IPS reflects an acceptance that there is a need for the Council to accelerate housing delivery, but that it is unlikely that adequate yield can be achieved by simply seeking accelerated delivery on sites which already have planning permission and full allocations. It is therefore the case that more homes will need to be delivered through windfall opportunities, in the context of the adopted Plan.

The Council's decision to progress a Draft IPS could mitigate the risks associated with a strategy without an IPS, where the Council would be forced to manage the tension between inadequate housing supply and having to consider myriad speculative applications which would be a departure but with no framework to determine which "departures" could be found acceptable. The absence of a framework for such decision-making would inevitably result in a lack of certainty for key stakeholders in the planning process. We note that the Draft IPS is framed in the context of demonstrating best efforts to address the housing shortfall. Paragraph 2.5 states:

*"By taking these actions, the Council intends to demonstrate how it is taking a proactive approach to reducing the shortfall and re-establishing a five year supply."*

The Draft IPS therefore provides an opportunity to provide a framework which gives some degree of certainty for all stakeholders in the planning process to determine whether identified windfall sites can reasonably

contribute to the Council's deliverable housing land supply in the period prior to the adoption of the emerging Local Plan Review (hereinafter referred to as "LPR" to align with the Draft IPS). It is absolutely crucial that the Draft IPS strikes the right balance and gives the opportunity to deliver enough homes to mitigate the risk of entirely speculative and opportunistic development encouraged by the Council's poor housing land position.

We now proceed to consider the Draft IPS on a paragraph-by-paragraph basis and identify where we recommend changes or deletions and justify those changes accordingly.

## **SECTION 1- BACKGROUND**

### [Paragraph 1.2](#)

We note the references to an intent to publish the LPR for Regulation 19 consultation in Spring 2021. This might well be ambitious given the extent of background evidence base work which is required and also in the knowledge that there is a plain need to identify considerable land for housing and employment and to deliver associated infrastructure.

### **RECOMMENDATION**

The Council should consider whether there is a need to amend this target date, or to otherwise confirm to Members that all of the necessary evidence base work is being taken forward and will be available to inform the Plan prior to the commencement of Regulation 19 consultation. It will not be acceptable to backfill the evidence base and then seek to align that to site selections which have been had without full evidence.

### [Paragraph 1.3](#)

We agree that there will be a requirement for the Council to adopt the Government's standard method figure of 628 dwellings per annum. We would however recognise that this is a base figure and has no regard for buffers which may need to be applied in the event of under-delivery in the short-term. There is a clear likelihood that there should be an expectation that 628 will be an absolute minimum in order to have any prospect to meet identified market housing and social housing requirements.

### **RECOMMENDATION**

The Council should clarify within paragraph 1.3 that 628 is a minimum figure and that under-delivery will (in addition to triggering the presumption in favour of development) create the requirement to both make up the backlog and to apply a buffer to future housing requirements.

## **SECTION 2- APPROACH TO BOOSTING HOUSING SUPPLY**

### [Paragraph 2.3](#)

This section frames the status and purpose of the document. The key consideration is that it would be rescinded where the Council had a demonstrable five year housing land supply accordant with Government guidance.

It then goes on to highlight that the presence of such a framework would at least provide the opportunity to have a consistent basis to consider windfall proposals that are not aligned to the adopted Plan. It states:

*"The intention is for the Council to be able to guide development to appropriate and sustainable locations using this document to assist in the consideration of planning applications. It will help to ensure that housing proposals that may be submitted in advance of the Local Plan Review are assessed in a consistent manner against national and local planning policies, with the aim of ensuring that the most appropriate development comes forward in the most suitable locations."*

It is our view that this approach is inadequate and will fail to enable the realisation of the broader requirement outlined at paragraph 2.1 which set out that:

*"The Council is required to significantly boost its housing supply<sup>2</sup>, and is working proactively to achieve a five year supply at the earliest possible date."*

The Council should instead seek to use this Draft IPS as a catalyst to securing a demonstrable 5 year housing land supply and then to maintain the IPS until the adoption of the Local Plan Review to take all reasonable opportunities to improve housing land supply even if the minimum five year supply is in place.

It is also important to note that the draft IPS will need to be given strong material weight as otherwise the standing presumptions in the adopted Development Plan may make it very difficult to positively determine applications that might otherwise be acceptable in the context of the Draft IPS.

## **RECOMMENDATION**

We suggest the following changes to paragraph 2.3 (amends shown in red):

*This statement aims to provide interim guidance which will apply until the **adoption of the Local Plan Review, with a clear intention that it will enable the Council to show that it ~~Council~~** considers it has a five year supply of housing in line with Government guidance. The intention is for the Council to be able to guide development to appropriate and sustainable locations using this document to assist in the consideration of planning applications. It will **be given considerable planning weight** to help to ensure that housing proposals that may be submitted in advance of the Local Plan Review are assessed in a consistent manner against national and local planning policies, with the aim of ensuring that the most appropriate development comes forward in the most suitable locations.*

### [Paragraph 2.4](#)

This section identifies the other key components of the Council's strategy to accelerate housing delivery alongside the Draft IPS. We do note that this is not phrased as an exhaustive list, but it would nevertheless be useful to identify other opportunities that could be taken forward.

We would have envisaged that Section 2.4 would be written to seek accelerated delivery of sites with permissions and full allocations. However, the wording of paragraph 2.4 is much looser and could be construed to support development which would come forward on sites which are "known" but not necessarily with the benefit of a full allocation or a planning permission. We feel that the list of approaches set out at paragraph 2.4

should be expressly concerned with sites that have approvals or allocations, as well as reference to opportunities on brownfield land. Opportunities to consider other “known” sites should really fall under the auspices of this Draft IPS.

## **RECOMMENDATION**

We suggest the following changes to paragraph 2.4 (amends shown in red):

*The Council intends for this Interim Statement to form one part of the Council’s proactive approach to the delivery of housing whilst the LPR progresses towards adoption. Other approaches being taken to boost housing supply and delivery include:*

- 1. Prioritising progress on delivery of **allocated ~~known~~** sites, including West of Chichester, progressing the Tangmere Compulsory Purchase Order, and testing more long term sites, ~~such as Southern Gateway, and~~*
- 2. Inviting developers to intensify and speed up development, on sites already underway; **and***
- 3. Encouraging residential development on accessible brownfield sites (including those identified or subject of submissions for the Brownfield Land Register).*

## **SECTION 3- PLANNING POLICY CONTEXT**

### Paragraph 3.4

This section frames the status of the CLPKP and the extent of weight that can be applied to it from July 2020 up to the point of adoption of the emerging Local Plan Review.

We note that there is no commentary in this section in regards to the weight that would be applied to both the Council’s performance in regard to housing delivery (such as the Housing Delivery Test and any potential need for a HDT Action Plan) or also reference to leading case law that could be highly relevant to specific proposals and given weight as precedent.

## **RECOMMENDATION**

We suggest the following changes to paragraph 3.4 (amends shown in red):

*“From the 15 July 2020, the relevant housing policies contained within the adopted Local Plan will be deemed to be ‘out of date’; however the CLPKP will remain part of the statutory development plan (until the LPR is adopted) and will continue to provide the basis for the consideration of planning applications for development within the Plan area. **Weight will also be given to the extent of unmet housing need (measured by reference to five year supply and HDT performance) and regard will be had to leading case law where shown to be relevant.**”*

## **SECTION 4- LOCAL CONTEXT**

### Paragraph 4.3

This section seeks to ensure that proposals which are supported under the Draft IPS are capable of being delivered promptly and suggests a reference to a two year period and a conditional control to give reasonable certainty that the development will be commenced in that period as well as reference to a phasing plan in terms

of delivery. There is then a comment that such an approach would allow the Council to "resist applications for less suitable sites."

We fundamentally disagree that the inclusion of such an obligation would result in the Council having the ability to resist proposals on "less suitable sites". In reality, it would have entirely the opposite effect if the promoters of more accessible sites were unable to provide the same level of commitment as a party who controlled a site that was highly inaccessible but could commit to immediate delivery.

A much better approach is to apply strong positive weight to proposals which could commit to early delivery of completed dwellings (rather than simply an early start on site which would not assist housing delivery in the short term).

## RECOMMENDATION

We suggest the following changes to paragraph 4.3 (amends shown in red):

*"Applicants will also be expected to show that they intend to develop sites promptly so that **completed** dwellings will begin to be delivered within a short period [up to a maximum of ~~2-3~~ years]. The Council will **apply strong positive weight to proposals which can accept a planning condition such that any planning permission to commence within 2 years and also to require the early completion of dwellings** to maximise the likelihood of delivery of housing within the Local Plan Area. Demonstration of deliverability<sup>3</sup> and a **binding requirement** ~~the intention~~ to develop (for example, through the requirement to submit a phasing plan) will be required to support planning applications and to help enable the Council to resist applications for less suitable sites."*

### [Paragraph 4.5](#)

This section seeks to ensure that proposals which would be supported under the Draft IPS are sustainably located, having regard to Policy 2 of the CLPKP and emerging Policy S2 of the LPR. This is therefore an approach which would seek to prioritise development consistent with a settlement hierarchy. We feel that in the context of locational sustainability, key criteria include proximity to:

- Shops and services;
- Schools and other public services;
- Public transport services which provide effective connectivity to urban centres; and
- Employment opportunities.

We would note that those criteria have influenced the settlement hierarchy which is identified under Policy 2, but that it would appear that (for settlements including Tangmere and Bosham) decisions in terms of the settlement hierarchy have had regard to what might be anticipated in the future following the implementation of major housing allocations rather than simply the quality of services and facilities that are currently available.

Paragraph 4.5 should be restructured to clarify that the settlement hierarchy set out at Policy 2 will have relevance but set alongside a new analysis of locational sustainability which gives greater weight to proximity to public transport hubs and local shops and services.

## RECOMMENDATION

We suggest the following changes to paragraph 4.5 (amends shown in red):

*"Sites should be sustainably located in relation to existing settlements, with access to the facilities and services that are generally likely to be required by new residents. Policy 2 of the CLPKP, and emerging policy S2 of the LPR, sets out the **anticipated settlement hierarchy which will inform consideration of any proposed site as part of a broader analysis of ensuring that growth is directed to sustainable locations with good access to public transport hubs and a range of shops and services.**"*

### [Paragraph 4.6](#)

This section continues the thread of paragraph 4.5 by arguing that the settlement hierarchy would form the key mechanism to ensure that scalar growth will be typically directed to larger settlements which would be better capable of accommodating that change by reference to relative scale. It suggests that the scale of development outside of Chichester or the defined Settlement Hubs would be smaller in scale.

It is clear however that the settlement hierarchy does not consistently identify settlements by reference to their current population, physical extent or access to public transport and local services. It will therefore be necessary to amend paragraph 4.6 accordingly to ensure that all opportunities for development in sustainable locations are taken.

## RECOMMENDATION

We suggest the following changes to paragraph 4.6 (amends shown in red):

*"Sites should be of a scale and density appropriate to the adjoining settlement **and its ability to provide local services to sustain growth.** Smaller scale sites, that provide for the gradual growth of settlements, are more likely to be suitable than sites that would significantly change the character of a place. Developments adjoining **smaller** settlements **which are less locationally sustainable** will be expected to be smaller in scale than those that might be suitable for the extension of Chichester or **other settlements which have access to public transport hubs and are of larger size with a broader range of facilities (including the Settlement Hubs),** ~~with their larger sizes and range of facilities.~~ The Council may support higher density development in settlements with greater facilities and accessibility<sup>4</sup>."*

### [Paragraph 4.9](#)

This section provides an illustration of the types of evidence base material which will be relevant to decision-making in terms of where development under the auspices of the Draft IPS are steered. The list of documents identified are all relevant but they are not exhaustive.

It will be important to ensure that this exercise gives very strong weight to locational sustainability and also that it has regard to previous consultation exercises where recommendations in terms of future development opportunities were subject of engagement. We are aware that several settlements have been subject of Neighbourhood Plan and Parish Plan consultations and that there have been instances where the emerging documents encouraged development which was not taken forward. This is illustrative of a sense that these settlements can accommodate more growth than is referenced in the adopted or indeed emerging Plan.

Proposals which can be identified in accessible locations and can demonstrate that future development can be accepted at a local level should be given a high priority.

## RECOMMENDATION

We suggest the following changes to paragraph 4.9 (amends shown in red):

*"Applicants are also directed to evidence base studies available on the Council's planning policy webpages that may be used to inform, steer and help determine proposals, including but not limited to: the Housing and Economic Land Availability Assessment (HELAA), the Strategic Flood Risk Assessment, the Water Quality Study and the Infrastructure Delivery Plan. **Strong weight will be given to an emerging report in regard to the Locational Sustainability of Settlements which will focus upon proximity to services and public transport hubs. Where settlements have considered Neighbourhood Plan or Parish Plan processes, regard will also be had to those processes and their background material which were subject of consultation.**"*

## SECTION 5- PURPOSE OF THIS DOCUMENT

### Paragraph 5.1

This section sets out the purpose of the Draft IPS and its remit as a mechanism to provide clarity to decision-making aligned to the objective to boost housing supply at least up to the point of the adoption of the Local Plan Review.

We welcome this approach and seek no change. However, we would point out that it therefore conflicts with the position set out at paragraph 2.3. The support we provide to the comments at paragraph 5.1 reinforces our view of the need to amend paragraph 2.3 accordingly.

### Paragraph 5.2

This section clarifies (by implication) that the Draft IPS would form one component of the wider evidence base to inform the acceptability of the proposals under the framework provided by s38(6) of the Planning Act.

That approach is accepted, but it would nevertheless be important to take that opportunity to clarify that the Draft IPS will seek to take forward opportunities for additional development where proposals can show locational sustainability and can secure accelerated delivery.

## RECOMMENDATION

We suggest the following changes to paragraph 5.2 (amends shown in red):

*"The acceptability of planning proposals will ultimately need to be assessed by the decision-maker on a case by case basis, in relation to the economic, social and environmental dimensions of sustainable development, leading to a conclusion about the overall sustainability of the proposals, whilst having regard to all elements of the proposal, up to date development plan policies, the NPPF, and other material considerations. **The IPS will seek to secure additional opportunities for housing development in locations which are sustainable and where it can be demonstrated that there would be early delivery of new homes.**"*

## SECTION 6- INTERIM HOUSING POLICY STATEMENT

### Paragraph 6.2

This is the concluding part of the Draft IPS which provides the proposed framework, informed by the earlier sections of the document. It is therefore important to ensure that it is framed to encourage development in sustainable locations which are capable of accommodating growth. That growth requirement is set in the context of a need for immediate contribution to housing supply, so it will be important that development proposals should demonstrate a commitment to early delivery of the new housing.

If developments of scale were supported through reference to the IPS, then there would also be a need to commit to prompt delivery of any associated infrastructure.

The IPS assertions as to what constitutes good quality development is effectively a set of twelve criteria cross-referenced to strands of the policy framework aligned to specific components of the evidence base. It is notable that there is absolutely no mention within this substantial section in terms of:

- Positive weight being given to the re-use of sites with existing built form;
- Positive weight being given to the redevelopment of accessible brownfield sites;
- Positive weight being given to the repurposing of obsolete buildings (of merit) to deliver new homes;
- Positive weight being given to proposals that can be shown to be acceptable to the local community;
- Positive weight being given to proposals which have walkable links to train stations and schools;
- Express recognition that there will be sustainable opportunities for development within larger areas that have historic designations; or
- Any specific requirement to secure accelerated delivery, or to show positive weight accordingly.

Our view is that it is essential that this section of the IPS is restructured so that it is clear that the entire purpose of the IPS is to provide a framework for accelerated delivery in locations which can be acceptable in planning terms and would generally be concluded to represent quality development.

The opportunity to utilise sites for housing development which are already developed is hugely important. This will inevitably result in lesser effects on the character of settlements and the wider countryside. The Council's published evidence in terms of landscape character and the potential for "landscape gaps" has not been subject of any consultation and will undoubtedly be reviewed in detail by stakeholders when they have an opportunity to make representations accordingly. We feel that the weight which should be afforded to these studies should be limited because they have not been subject of consultation. Our reading of section 3 of paragraph 6.2 (which refers to future LVIA submissions) is in effect a tacit admission that those studies will be challenged.

In order to be an effective tool, mechanisms to positively require early completion of new homes must be included. This would be entirely consistent with the approach to deliver development on sites contiguous to settlement boundaries creating lesser effects on openness and greater opportunity to use existing local services.



The Council will of course be aware of the need to ensure that any new development is planned to reduce the reliance on the private car, not least in the context of Chichester where peak traffic demand conditions on key routes is of particular concern to some local stakeholders. This being the case, opportunities to locate close to existing public transport hubs would represent an excellent key component of delivering development which is locationally sustainable. The best example of this would be sites which have walkable links to train stations.

The policy framework for the district must also include reference to the designations afforded by the National Park and the AONB. However, it should not be construed that location within the arbitrarily defined AONB would represent any automatic impediment to development. There are of course entire settlements within the AONB as well as numerous other sites with existing built form and other previously developed land.

A more nuanced analysis of how any given proposal might impact upon landscape and settlement character is crucial and provides a better opportunity to deliver “good growth” that could support the vitality of settlements and the economy of the AONB without impeding the key assets of its outstanding natural beauty.

It is inevitable that proposals for new growth will attract comment and that all such proposals will be divisive. Indeed, this must be the very purpose of introducing a policy framework to guide decision-making in a situation which could otherwise approach a “policy vacuum”. That being the case, if there are examples of communities having considered opportunities for growth then this should be given weight. Opportunities to deliver accelerated growth for sites which can demonstrate some degree of community support should be given positive weight over and above sites which are known to be controversial.

## RECOMMENDATION

We suggest the following changes to paragraph 6.2 (amends shown in red):

***To provide clarity for applicants and other parties, the following criteria set out what the Council considers good quality development in the Chichester Local Plan area, with reference to adopted and emerging Local Plan policy and evidence. Applicants are encouraged to submit their own evidence in addition to the Council's evidence base.***

*1. The site boundary in whole or in part is contiguous with an identified settlement boundary (i.e. at least one boundary must adjoin the settlement boundary or be immediately adjacent to it)*

*Relevant policies include:*

- *CLPKP Policy 2 Development Strategy and Settlement Hierarchy*
- *CLPKP Policy 45 Development in the Countryside*
- *LPR Policy 2 Settlement Hierarchy*
- *LPR Policy S4 Countryside*

*Relevant evidence includes:*

- *Local Plan Policies Map*
- *HELAA*

2. The scale of development proposed is appropriate having regard to the settlement's location in the settlement hierarchy and the range of facilities which would make it a sustainable location for new development. Proposals that can provide walkable links to public transport hubs (particularly train stations) prior to first occupation will be given strong positive weight.

Relevant policies include:

- CLPKP Policy 2 Development Strategy and Settlement Hierarchy
- LPR Policy S2 Settlement Hierarchy

Relevant evidence includes:

- Settlement Hierarchy Background Paper
- Settlement Capacity Profiles

3. The impact of development on the edge of settlements, or as part of areas identified as the locations for potential landscape gaps, individually or cumulatively does not result in the actual or perceived coalescence of settlements, as demonstrated through the submission of a Landscape and Visual Impact Assessment.

Relevant policies include:

- CLPKP Policy 47 Heritage and Design
- CLPKP Policy 48 Natural Environment
- LPR Policy S24 Countryside
- LPR Policy S26 Natural Environment
- LPR Policy DM28 Natural Environment

Relevant evidence includes:

- Landscape Capacity Study
- Landscape Gap Assessment

4. Development proposals make best and most efficient use of the land, whilst respecting the character and appearance of the nearby settlement. The Council will encourage planned higher densities in sustainable locations where appropriate (for example, in Chichester City and the Settlement Hubs or other locations close to railway stations). Arbitrarily low density or piecemeal development such as the artificial sub-division of larger land parcels will not be encouraged. The re-use of land with existing built form (or otherwise PDL and sites on the Brownfield Land Register) for homes will be given strong positive weight.

Relevant policies include:

- CLPKP Policy 2 Development Strategy and Settlement Hierarchy
- CLPKP Policy 33 New Residential Development
- CLPKP Policy 47 Heritage and Design
- LPR Policy DM3 Housing Density

Relevant evidence includes:

- Settlement Hierarchy Background Paper
- Brownfield Land Register

5. Proposals should demonstrate consideration of the impact of development on the surrounding townscape and landscape character, including the South Downs National Park and the Chichester Harbour AONB and their settings. Development should be designed to protect long-distance views and intervisibility between the South Downs National Park and the

Chichester Harbour AONB. *Proposals within the AONB that are sustainably located and do not materially impact long-distance views and intervisibility will be given positive weight.*

Relevant policies include:

- CLPKP Policy 43 Chichester Harbour Area of Outstanding Natural Beauty
- CLPKP Policy 47 Heritage and Design
- CLPKP Policy 48 Natural Environment
- LPR Policy S24 Countryside
- LPR Policy S26 Natural Environment
- LPR Policy DM19 Chichester Harbour Area of Outstanding Natural Beauty
- LPR Policy DM27 Historic Environment
- LPR Policy DM28 Natural Environment

Relevant evidence includes:

- Landscape Capacity Study

6. Development proposals in or adjacent to areas identified as potential Strategic Wildlife Corridors as identified in the Strategic Wildlife Corridors Background Paper should demonstrate that they will not affect the potential or value of the wildlife corridor.

Relevant policies include:

- LPR S30 Strategic Wildlife Corridors

Relevant evidence:

- Strategic Wildlife Corridors Background Paper

7. Development proposals should set out how necessary infrastructure will be secured, including, for example: wastewater conveyance and treatment, affordable housing, open space, and highways improvements. *Proposals that can commit to delivery of any necessary infrastructure prior to first occupation will be given strong positive weight.*

Relevant policies include:

- CLPKP Policy 9 Development and Infrastructure Provision
- CLPKP Policy 12 Water Management in the Apuldram Wastewater Treatment Catchment
- CLPKP Policy 34 Affordable Housing
- CLPKP Policy 54 Open Space, Sport and Recreation
- LPR Policy S6 Affordable Housing
- LPR Policy S12 Infrastructure Provision
- LPR Policy S31 Wastewater Management and Water Quality

Relevant evidence includes:

- Infrastructure Delivery Plan
- Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy

8. Development proposals shall not compromise on environmental quality and should demonstrate high standards of construction in accordance with the Council's declaration of a Climate Change Emergency. Applicants will be required to

submit necessary detailed information within a Sustainability Statement or chapter within the Design and Access Statement to include, but not be limited to:

- Achieving the higher building regulations water consumption standard of a maximum of 110 litres per person per day including external water use;
- *Proposals that would secure the re-purposing of existing built form in sustainable locations to deliver new homes will be afforded strong positive weight;*
- Minimising energy consumption to achieve at least a 19% improvement in the Dwelling Emission Rate (DER) over the Target Emission Rate (TER) calculated according to Part L of the Building Regulations 2013. This should be achieved through improvements to the fabric of the dwelling;
- Maximising energy supplied from renewable resources to ensure that at least 10% of the predicted residual energy requirements of the development, after the improvements to the fabric explained above, is met through the incorporation of renewable energy; and
- Incorporates electric vehicle charging infrastructure in accordance with West Sussex County Council's Car Parking Standards Guidance. *Proposals that can commit to delivery of EV charging infrastructure that exceeds policy requirements will be given strong positive weight.*

Relevant policies include:

- CLPKP Policy 40 Sustainable Design and Construction
- LPR Policy DM16 Sustainable Design and Construction

Relevant evidence includes:

- West Sussex County Council Car Parking Standards Guidance
- West Sussex Cycling Design Guide

9. Development proposals shall be of high quality design that respects and enhances the existing character of settlements and contributes to creating places of high architectural and built quality. Proposals should conserve and enhance the special interest and settings of designated and non-designated heritage assets, as demonstrated through the submission of a Design and Access Statement.

Relevant policies include:

- CLPKP Policy 33 New Residential Development
- CLPKP Policy 47 Heritage and Design
- LPR Policy S20 Design
- LPR Policy S22 Historic Environment
- LPR Policy S32 Design Strategies for Strat

Relevant evidence includes:

- National Design Guide

10. Development should be sustainably located in accessibility terms, and include vehicular, pedestrian and cycle links to the adjoining settlement and networks and, where appropriate, provide opportunities for new and upgraded linkages.

Relevant policies include:

- CLPKP Policy 8 Transport and Accessibility
- CLPKP Policy 39 Transport, Accessibility and Parking

- LPR Policy S23 Transport and Accessibility
- LPR Policy DM8 Transport, Accessibility and Parking

Relevant evidence includes:

- Local Plan Policies Map
- Settlement Hierarchy Background Paper

11. Development must be located, designed and laid out to ensure that *the new houses are ~~it is~~ safe*, that the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere, and that residual risks are safely managed. This includes, where relevant, provision of the necessary information for the LPA to undertake a sequential test, and where necessary the exception test, incorporation of flood mitigation measures into the design (including evidence of independent verification of SUDs designs and ongoing maintenance) and evidence that development would not constrain the *effective natural* function of the flood plain, either by impeding flood flow or reducing storage capacity. All flood risk assessments should be informed by the most recent climate change allowances published by the Environment Agency.

Relevant policies include:

- CLPKP Policy 42 Flood Risk and Water Management
- LPR Policy S27 Flood Risk Management
- LPR Policy DM18 Flood Risk and Water Management

Relevant evidence includes:

- Strategic Flood Risk Assessment Level 1
- Chichester Surface Water and Foul Drainage SPD

12. Where appropriate, development proposals shall demonstrate how they achieve nitrate neutrality in accordance with Natural England's latest guidance on achieving nutrient neutrality for new housing development. *Proposals that can commit to this approach prior to first occupation will be given strong positive weight.*

Relevant evidence includes:

- Advice on achieving nutrient neutrality for new development in the Solent Region, Natural England March 2020

*13. In the context of development proposals that are not contiguous with a defined settlement boundary (such as washed over settlements or freestanding built form) then it will be necessary that the site boundary in whole or in part is contiguous with existing built form, or currently supports built form on the site itself. Those proposals would be acceptable subject to demonstration that the location is otherwise sustainable and would not materially impact upon the character of the countryside.*

Relevant policies include:

- CLPKP Policy 2 Development Strategy and Settlement Hierarchy
- CLPKP Policy 45 Development in the Countryside
- LPR Policy S4 Countryside

Relevant evidence includes:

- Local Plan Policies Map
- HELAA

*14. In the context of development proposals located close to settlements, evidence of engagement with local stakeholders will be encouraged. Where there is evidence that proposals have been developed through iterative dialogue and can demonstrate (full or partial) support with stakeholders that will be afforded very strong positive weight.*

*Relevant evidence includes:*

- *Neighbourhood Plans (adopted and working papers)*
- *Parish Plan (adopted and working papers)*

## Summary

We have set out our grounds of concern clearly and would request that the Council should revise the Draft IPS accordingly. We feel that these proposed changes are crucial to giving the best opportunity for the IPS to tackle the urgent need to deliver additional housing prior to the adoption of the Local Plan Review, whilst ensuring that the decision-making framework gives all stakeholders a firm basis to support new homes that are sustainably located that will be delivered promptly.

The Council is aware that there are numerous examples of sites that can readily be brought forward in sustainable locations close to local services and public transport hubs. The Draft IPS as worded would not encourage their delivery over others which are less sustainable and with less certainty over early delivery. Our proposed approach gives a better structure to deliver good growth in the interim period to the adoption of the Local Plan Review.

Without such revisions, we will also have to continue with our very strong objections to the draft IPS which would otherwise be ineffective and fail to supplement the Plan and deliver much needed new housing without recourse to speculative and opportunistic proposals.

Yours sincerely



Mark Aylward

**ATP**

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