

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

Date: 10th July 2020

Sent by email to planningpolicy@chichester.gov.uk

Dear Sir/ Madam

Gleeson Strategic Land Response to the Draft Interim Policy Statement for Housing Development

Thank you for consulting Gleeson Strategic Land on the Draft Interim Policy Statement for Housing Development (IPS). Gleeson Strategic Land Ltd is part of MJ Gleeson PLC which has over 100 years of experience in the development industry. Gleeson Strategic Land promotes sites for development across the south of England ranging from small scale, to large scale strategic sites. This representation is submitted in relation to the land under Gleeson's control at Land West of Clay Lane, Fishbourne.

Approach to boosting housing supply

Gleeson welcomes the Council's proactive approach to addressing the potential housing land supply shortfall in the interim period until the Local Plan Review is adopted. Gleeson agrees that development should be guided to appropriate and sustainable locations. Speeding up the progress of sites which have already commenced development is sensible, however prioritising the progress of known sites should be balanced against new sites that may be submitted to the Council during the interim period. The priority should go to sites that can deliver homes quickly in sustainable locations. This will have the most impact on reducing any housing land supply shortfall.

Planning Policy Context

The IPS sets out that the Council is currently reviewing its adopted Local Plan and at this stage of preparation only limited weight can be given to draft policies of the Local Plan Review. The NPPF para 49 states '*arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited circumstances*' the two circumstances are where the proposal is of such a substantial scale, or its cumulative effect would be so significant, that it would undermine the plan-making process; and if the emerging plan is at an advanced stage but is not yet formally adopted. It is therefore considered that applications for smaller scale development sites that are deliverable now can, and should, be granted planning permission to contribute towards increasing the housing land supply.

Local Context

The Council's desired to grant planning permission for sites which will deliver new housing quickly is supported and the intention to utilise conditions to encourage development to commence within 2 years is understood where this is appropriate. However, the use of a more restrictive time condition does need to be justified for each individual development. The standard 3 year time limit would still allow planning permissions for new homes to contribute to the Council's five year housing land supply requirements. In addition, the need for off-site infrastructure does not

necessarily impede the delivery of new homes and a sites ability to contribute towards the five year housing land supply. The requirement for off-site infrastructure should not be used as a reason to refuse planning permission for well-located and sustainable sites. The proposed requirements for sites to be deliverable and ready for development is supported by Gleeson. Gleeson has a strong record in securing planning permission for sites that go on to be developed and recognises that this is key to the delivery of new homes. The requirement for outline applications to be submitted with an illustrative masterplan is also accepted.

In relation to sustainability Gleeson agrees that sites should be sustainably located in relation to existing settlements. Gleeson also believes that sites with good access to facilities and services required by new residents can often support higher density development. It is important to note that higher density schemes can be well designed so that they do not cause harm to the existing character of settlements or the surrounding area, and so Gleeson would advise against setting any particular limits on density for sites.

Interim Housing Policy Statement

Section 6 of the consultation document sets out the criteria for the Interim Housing Policy Statement. This states that the Council recognises the presumption in favour of sustainable development but that the Council will seek to ensure that planning applications for good quality housing developments of an appropriate scale and in accessible locations are supported. Gleeson agrees with the Council's intention but has the following comments on criteria 3 and 6 and 8 and the amount of influence and weight these should have in planning decisions during the interim period.

Criteria 3 requires that the impact of development on the edge of settlements, or in areas identified as the locations for potential landscape gaps, individually or cumulatively, does not result in the actual or perceived coalescence of settlements. Gleeson agrees that the individual identity of settlements should be taken into account in planning decisions, but it is not considered that the Landscape Gap Assessment should be afforded any weight when assessing planning applications. The study is not adopted policy, having not been tested at examination, and each application should be assessed against its own individual merits at the time of submission.

Criteria 6 states that 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. Gleeson recognises that development proposals should strive to reduce and mitigate impact on ecology and should have regard to the proposed Strategic Wildlife Corridors but again these corridors are still proposed and not set out in any adopted policy and so cannot be afforded weight in decision making. The exact route of the corridors could still be open to change. It is also important to note that the currently proposed corridors do have existing development within them, and it is encouraging to see within Criteria 6 recognition that development can come forward within the proposed Wildlife Corridors. Residential development in particular can, through good landscape design, incorporate open space corridors and new planting to maintain and potentially enhance wildlife connectivity through the corridor.

Criteria 8 requires new development to achieve improved environmental performance compared to the existing policies of the Local Plan. Whilst Gleeson agrees that new development needs to have good environmental performance these new standards are not adopted policies and development proposals should not be refused for not meeting these higher standards.

The NPPF para 48 does state that Local planning authorities may give weight to relevant policies in emerging plans. However, the Local Plan Review is not adopted yet and has not been through the necessary consultation or examination periods. The policies relating to the proposed local gaps, wildlife corridor and building standards should therefore be afforded no or very limited weight in planning decisions. It is also considered that the proposed criteria in the Interim Housing Policy Statement need to be balanced against the acute need for new homes in Chichester. Sites that are available, deliverable, and developable now need to be supported by the Council to ensure new homes are built and the housing supply is maintained.

Conclusion

To summarise the above points, Gleeson Strategic Land's position is that whilst the aim of the Interim Housing Policy Statement to encourage the delivery of new homes is supported it cannot be used to bring forward policies of the future Local Plan Review, and it should not affect the weight that should be given to unadopted policies. Gleeson does however welcome the Council's proactive approach and would like to highlight that the promoted land which has previously been submitted to the Council's call for sites at Clay Lane, Fishbourne is available for immediate delivery and could provide homes in a location adjacent to a settlement which is has been identified as suitable and sustainable for additional growth.

Yours Sincerely,



Peter Rawlinson

Planning Manager

T: 01252 360 319

E: pjrawlinson@mjgleeson.com