

# PILKINGTON TOWN PLANNING LTD

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10/07/20

Mr T Ayling

Planning Policy Team  
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**By e-mail only**

Dear Mr Ayling

## **Draft Interim Policy Statement for Housing**

I write in respect of the above draft document and make the following comments on behalf of Pilkington Town Planning.

We support the preparation of an Interim Policy Statement for Housing as this will be a valuable tool in bringing forward much needed housing in the District in a planned and controlled way whilst the Local Plan Review progresses.

Criterion 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 immediately adjacent to it).*

In some instances there will be opportunities to secure sustainable housing development on land that is not contiguous with an identified settlement boundary i.e. on land that is not isolated in the open countryside but is on the edge of a settlement where parts of the built form have not been included with the defined settlement boundary. To maximise the opportunity of bringing forward development on this type of site criterion 1 should be expanded to read as follows:

*"The site boundary in whole or in part is contiguous with an identified settlement boundary or the land abuts built development that is adjacent to an identified settlement boundary"*

Criterion 3. *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, as demonstrated through the submission of a Landscape and Visual Impact Assessment.*

Whilst it is accepted that landscape impact is an important consideration some sites because of their small size and location with some being less sensitive in the landscape it may not be necessary to prepare a full Landscape Visual Impact Assessment (LVIA). As result this criterion should provide some flexibility as to whether or not a full LVIA is required.

The Interim Policy Statement for Housing is mainly directed at bringing forward greenfield development in sustainable locations on the edges of existing settlements. It does not however facilitate 'infill' development in sustainable locations. Cumulatively, infill development can also make a valuable contribution to increasing the supply of housing particularly in the short term as it is less dependent on infrastructure provision and can be built out quickly. It would also make efficient and effective use of land which is encouraged by paragraphs 117 and 122 of the National Planning Policy Framework (NPPF).

It would also be consistent with paragraph 119 of the NPPF which confirms that *"Local planning authorities, and other plan making bodies, should take a proactive role in identifying and helping bring forward land that may be suitable for meeting development needs....."*. The re-introduction of an infill policy also has the potential to reduce the amount of housing needed on greenfield sites

To make the most of this potential housing supply source the district council should re-introduce an infill policy similar to Policy RE16 of the Chichester District Local Plan: First Review adopted in April 1999. The new infill policy could read as follows:

*"Outside Settlement Policy Areas new housing development will be strictly controlled. The infilling by dwelling houses of small gaps within small groups of houses will only be permitted provided that:*

- a) The proposal, by reason of its scale and character, would not damage the character or visual qualities of the surrounding environment. In Areas of Outstanding Natural Beauty and Conservation Areas the effect of the proposal will be considered in relation to the particular character of the locality concerned;*
- b) The proposal would not create ribbon development or a fragmented pattern of development in the countryside;*
- c) The size of the proposed new dwelling plots and the density of buildings are consistent with those in the surrounding area*
- d) The established amenities of adjoining residents are not adversely affected;*

*For the purposes of this policy the following definitions apply:*

- i. 'Small Gap' – a single vacant plot in an otherwise substantially developed frontage*
- ii. 'Small Group' – A compact group of dwellings with its own identity in physical and social terms as a village or hamlet or clearly related to such a settlement. This excludes isolated or loose knit groups of dwellings"*

I trust the above comments are of assistance to you. Should you require further information or clarification on any matter please do not hesitate to contact me.

Yours sincerely

**G Pilkington**

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Director