

Mr Toby Ayling
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9 July 2020

Dear Toby

Subject: SDNPA response to Chichester Draft Interim Policy Statement for Housing Development – June 2020

Thank you for consulting the South Downs National Park Authority (SDNPA) on your draft Interim Policy Statement. I note this statement is intended to guide residential development until the Chichester Local Plan Review is adopted and does not apply to land within the South Downs National Park. The Interim Policy Statement (IPS) includes 12 Criteria which set out what Chichester District Council considers to be good quality development in the Chichester Local Plan area, with reference to adopted and emerging Local Plan policy and evidence.

The SDNPA and all relevant authorities are required to have regard to the purposes of the South Downs National Park (SDNP) as set out in Section 62 of the Environment Act 1995. The purposes are ‘to conserve and enhance the natural beauty, wildlife and cultural heritage of the area’ and ‘to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.’ The Authority would appreciate reference to Section 62 being added to the IPS, specifically at section 6 which sets out the Chichester District Council’s criteria for good quality development in the Chichester Local Plan area.

Duty to Cooperate

You’ll be aware from previous responses to the Local Plan Review, the SDNPA has a set of six strategic cross-boundary priorities which are highlighted below and referenced in the following comments on the IPS where relevant. These cross-boundary priorities will continue to provide a framework for ongoing Duty to Cooperate discussions:

- Conserving and enhancing the natural beauty of the area.
- Conserving and enhancing the region’s biodiversity (including green infrastructure issues).
- The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople.
- The promotion of sustainable tourism.
- Development of the local economy.
- Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.



Conserving and enhancing the natural beauty

We welcome Criteria 5 of the IPS and the requirement to consider the impact of development on the surrounding townscape and landscape character, including the South Downs National Park and Chichester AONB and their settings. We consider the criterion should be strengthened to ensure that development proposals have no adverse impact on the openness of views and setting of the SDNP. Reference here to Section 62 of the Environment Act 1995 would be beneficial. We also welcome the requirement to protect long-distance views and intervisibility between the SDNP and the Chichester Harbour AONB.

Conserving and enhancing the region's biodiversity (including green infrastructure).

We welcome the inclusion of Criteria 6 which requires development proposals in or adjacent to areas identified as potential Strategic Wildlife Corridors to demonstrate they will not affect the potential or value of the wildlife corridor. As we have previously commented on the Local Plan Review, the SDNPA very much welcomes and supports the inclusion into policy of wildlife corridors which traverse the district connecting the two protected landscapes of the Chichester Harbour AONB and the SDNPA. We therefore, strongly support the use of this criterion in the interim before the Local Plan Review can be adopted to ensure the long-term effectiveness of identifying green infrastructure and habitat networks within the Chichester Local Plan area. We suggest the wording of Criteria 6 is clarified to state: '...should demonstrate that they will not adversely affect the potential or value of the wildlife corridor.'

We note the IPS does not set out in full the range of relevant national and local planning policy which will be applied when considering planning applications for residential development, however we consider there should be recognition within the IPS of the policy requirements relating to Special Protections Areas (i.e. the *Solent Recreation Mitigation Partnership*) and Special Areas of Conservation (*Ebernoe Common, The Mens, and Singleton & Cocking*) within the local area which are important to the region's biodiversity.

The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople

The SDNPA acknowledges CDC's proactive approach to housing supply and welcomes the IPS ahead of adoption of the Local Plan Review to guide development to appropriate and sustainable locations. The SDNPA will continue to work with the Council through the progression of the Local Plan Review to address unmet housing need arising in that part of the SDNP within Chichester District.

Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel

The SDNPA supports the inclusion of Criteria 10 which requires development to be sustainably located and include vehicular, pedestrian and cycle links to the adjoining settlement and networks, and to provide opportunities for new and upgraded linkages. Given the national timeline to Net Zero emissions and CDC's own declaration of a Climate Change Emergency, this criterion should clearly prioritise sustainable modes of travel. Recent experience of the pandemic and the rising health and wellbeing agenda have highlighted the value of improving links into the National Park, particularly by sustainable and active transport modes. We suggest the IPS makes explicit reference to supporting the network of Public Rights of Way and seek opportunities to join up existing, and or improvements to the network.



I trust you find these comments useful in establishing your Interim Policy Statement and we look forward to future opportunities to contribute to the progression of your Local Plan Review. If you have any questions on the content of this letter, please do not hesitate to contact me.

Yours sincerely



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