**Responses from Members of Southbourne Parish Neighbourhood Plan Steering Group to Chichester District Council’s Consultation on the Interim Policy Statement for Housing Development.**

We understand that after 15th July 2020, due to the status of the Local Plan and the apparent lack of a 5 year housing supply, the District may be vulnerable to planning applications for housing in inappropriate locations. Approvals may lie outside the District Council’s control due to appeals determined by Central Government. We are disappointed that the District Council should find itself in this position and struggle to accept the damage that this situation is likely to cause. However, we are realistic enough to recognise that an effort has to be made to exert some control over the location of new housing development. We note the safeguards proposed in the Interim Housing Policy Statement but have concerns about their application.

We suggest three alterations.

POINT 1

Para 6.2 - The role of Settlement Hubs and Neighbourhood Plans

The Policy steers development towards Settlement Hubs, and to a lesser extent Service Villages, and will allow development on land adjoining but outside the approved settlement boundaries (Criteria 1, 2 and 3). This will remove the certainty fundamental to Neighbourhood Plans which aim to contain development within settlement boundaries. As a result Neighbourhood Plans will lose their credibility. Local residents and the volunteers who have put so much work into preparing both “made” Plans and the current reviews, are likely to be very disillusioned. The supporting text (paragraph 3.3) acknowledges that Neighbourhood Plans are part of the Development Plan but we consider that, at the very least, the Policy should do the same and require that they be taken into account on a par with the Local Plan.

Recommend The supporting text in paragraph 6.2 requires reference to be made to “adopted and emerging Local Plan policy and evidence” but we consider that it should read “ adopted and emerging Local and Neighbourhood Plan Policy and evidence”.

POINT 2

Para 6.2 Criteria 1 – Settlement Boundaries

If approval is granted for a site “contiguous with an identified settlement boundary” it is not clear whether that boundary is automatically re-defined to include the permitted site. If it is, this could lead to creeping incrementalism with a series of adjoining sites being permitted extending ever further into the surrounding rural area. Presumably extensions to settlement boundaries must stop somewhere. We suggest :-

Recommend (Para 6.2 Criteria 1) “The site boundary in whole or in part is contiguous with an identified settlement boundary as approved in the relevant made Neighbourhood Plan or the Site Allocations Development Plan Document (ie at least one boundary must adjoin the settlement boundary or be immediately adjacent to it)”

POINT 3

Para 6.2 Criteria 5 - Chichester Harbour Area of Outstanding Natural Beauty

We understand that National Parks and Areas of Outstanding Natural Beauty enjoy the same level of protection in national planning policy. The difference in the context of this proposed Interim Policy is that while the SDNP is its own Planning Authority, Chichester District is the Planning Authority for the Harbour AONB and determines proposals for development within the AONB boundary. The Interim Policy should recognise this. While development within the Harbour AONB cannot be ruled out, applicants should be made aware that the AONB is distinguished from the rest of the District due to international, national and local designations and is also accorded the highest status of protection In relation to landscape and scenic beauty (NPPF paragraphs 171 & 172).

We recall the last CDC Interim Policy “Facilitating Appropriate Development: 2012 - 2014”. It was similar in many respects to this one, and in practice encouraged development on some small high value sites within the AONB, which would not normally have been permitted, and which provided small numbers of expensive private housing without any affordable housing contribution. We would not wish to see this outcome repeated.

Recommend (Para 5 – last line) “……..……….and the Chichester Harbour AONB. Land within the Chichester Harbour AONB has the highest status of landscape protection, and proposals must also be shown to contribute to and enhance the quality of its biodiversity that has been recognised by international, national and local designations.”

* 1. This does not allow for cohesive development.
	2. No indication by what criteria ‘Appropriate Development’ is judged eg**. local** housing needs
		1. How will ‘prioritising’ be carried out?.
		2. Given developers have their own time frames how does ‘inviting’ them to speed up developments change anything? What incentives will be offered? Off-site construction could improve delivery time if speed is impotant.
	3. The actions do not seem to carry any weight in so far as speeding up development other than to the detriment of the area as a whole in which the developments take place.
	4. Given CDC’s record on producing accurate documentation on time (hence the need for this Statement) I can have no confidence that this policy will enable CDC to exert any real control over development.
	5. Given the current state of the overdue Local Plan Review and the information in the Council’s Planning, Health and Environmental Protection Statement, I have no confidence that the Council will be willing or able to exercise control over planning applications without a Local Plan
	6. Piecemeal, short term development makes long term development of a community less sustainable when the Local Plan Review has been completed.

 6.1 Criteria for ‘Good quality housing developments’ must be published, together with examples (of which there are many)

* + 1. Environmental quality and high standards of construction need to be defined and, in most cases, should exceed the minimum (Building Regulations). They should not be left to the developer to decide. The Parliamentary Committee on Climate Change (2018) advised the Govt. to ‘Strengthen new-build standards…’and should be future proofed and ‘accommodate low carbon heating options’ Faster and more efficient methods of building and insulation through off-site construction would do more to speed up developments and improve carbon reduction.
		2. High quality design and creating places of high architectural build and quality are excellent aims but how are they to be achieved? There are very good examples to be drawn upon from councils and developers; CDC’s Design Protocol does not appear to have been updated since published in 2013. Apart from individual homes there is no evidence that the above aims have been impressed upon recent developments and this is something that demands immediate attention if the whole area is not to become a pastiche of 20th century housing estates.

Given that this document is necessary because the Council is not in a position to complete the Local Plan there needs to be more information on how C D C intend to implement and control this policy (when finalised) if it is to be effective