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Chichester District Council Interim Policy Statement for Housing - Consultation June 2020

Thank you for inviting Sussex Wildlife Trust (SWT) to make comments on the Chichester District Council (CDC) Interim Policy Statement for Housing. It is our understanding that the comments we make in relation to this consultation do not alter our comments regarding amendments to policies produced in the Chichester Local Plan Review (LPR) Regulation 18 Consultation. We expect that our comments have been considered and we will have further opportunity to respond on the suitability of those policies during the Regulation 19 consultation of the LPR. However this consultation is not the forum to discuss those proposed amendments in detail.

Having reading the interim policy statement SWT wish to submit the following comments:

Section 1 - Background

We note that the interim policy statement document states that from the 15th July there will be an increase in the annual housing number from 435 to 628. SWT therefore seek assurances that that the determination of any future planning applications recognise the potential increased cumulative impacts on biodiversity and the wider natural environment from this increase in the annual housing number.

Section 2 - Approach to boosting Housing Supply

We see that section 2.4 of the policy statement states that: *'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 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.*

In relation to point 1 from this section, we are keen to understand how the aforementioned sites will be progressed in light of comments raised in the Regulation 18 consultations. SWT responded to the Regulation 18 consultation for the LPR and highlighted a number of concerns with the site allocations: either in relation to wording of the policy that did not reflect the importance of avoiding impacts on designated sites, impacts on priority habitats or not demonstrating a clear requirement to deliver green infrastructure or biodiversity gains.

Considering point 2, we ask for clarity from CDC about what actions and processes will be involved when inviting developers to intensify and speed up development on sites already underway? For example, what does CDC mean by already underway? Will further evidence be required to assess impact of intensifying a development for example on biodiversity and other critical natural capital?

Section 4 - Local Context

Point 4.2 of the interim statement highlights that sites should be deliverable at the time of the planning application. They should not be, for example, dependent upon delivery of significant off-site infrastructure; and should be fully in the applicant's control. Does CDC include environmental infrastructure in its definition of significant off site

infrastructure? Including any off site compensation and the delivery of biodiversity net gain? Further to this we seek clarity on the significance of this statement in terms of delivering the nitrogen neutrality requirements as set out by Natural England. We feel this section should be made clearer in terms of the above points.

SWT propose that section 4.7 includes a specific reference to biodiversity, as this is obviously missing from this section. It should be acknowledged that a development needs to be acceptable in terms of minimising impacts on biodiversity. We recommend the following amendment highlighted in bold:

*Sites should also be acceptable in all other respects, e.g. highways access, flood risk, contribute to affordable housing, **biodiversity** and open space requirements, and should reflect the needs of local communities, in relation to the amount, size, type and mix of housing tenures proposed. It is important that any proposed development also complies with environmental standards as identified in Policy 40 of the CLPKP.*

Section 6 - Interim Policy Statement

Section 6.2 clearly states that the interim planning statement will provide clarity for applicants and other parties. The following criteria set out what CDC considers good quality development in the Chichester Local Plan area, with reference to adopted and emerging Local Plan policy and evidence. Out of the 12 policy areas highlighted, SWT would expect to see this policy statement set out clearly that it remains the council's intention to ensure that all developers maintain the requirements of Policy 49 of the CLPKP as a minimum.

However it is our position, that CDC should be prepared to drive forward the requirement to deliver biodiversity net gain as committed to in policy DM29 in the LPR and as set out in 170 of the NPPF. It is possible that before the adoption of the LPR, biodiversity net gain will become mandatory through the emerging Environment Act.

Given the statements in section 2.4 about prioritising progressing in certain areas, we feel that the requirement to protect and add to biodiversity must be much clearer in this statement.

We acknowledge that the sixth bullet point does highlight the importance of the strategic wildlife corridors and we support the recognition of this policy within the interim planning statement. However we ask CDC to add further wording to the is bullet point or an additional bullet point to clearly demonstrate that CDC continue to recognise that a sites existing biodiversity value will be maintained and net gain delivered as per the existing CLPKP policy 49 and the emerging LPR policy DM29 & DM30. We make the following suggestion:

*'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. **All development must safeguard and provide a net gain to biodiversity***

Relevant policies include:

- **CLPKP Policy 49 Biodiversity**
- **LPR DM29 Biodiversity**
- *LPR S30 Strategic Wildlife Corridors*

Relevant evidence:

- *Strategic Wildlife Corridors Background Paper*
- **Local Biodiversity Action Plan'**

We would be more than happy to discuss our response further, so please do get in contact if you have any questions.

Yours sincerely,

Laura Brook
Conservation Officer