



# Local Plan Review 2035 Representations (Regulation 18)

Land at Townfield, Kirdford

**Boyer**

## Report Control

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## **APPENDIX**

Appendix One – Site Location Plan

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## 1. EXECUTIVE SUMMARY

- 1.1 These representations have been prepared on behalf of Welbeck Strategic Land IV LLP (Welbeck Land) who have an interest in land to the south of Townfield, Kirdford. Part of the site is allocated for community facilities and between 6-10 homes in the Kirdford Neighbourhood Plan (2014).
- 1.2 Kirdford is located within the 'North of Plan Area' as set out within both the current and emerging Local Plan. Kirdford is defined as a 'service village', one of five within the North of Plan Area, which are the highest order settlements in this area and so is considered an appropriate location for additional residential development
- 1.3 The NPPF requires that housing requirements reflect the overall strategy for the pattern and scale of development, promoting sustainable development in rural areas. As such, the North of Plan Area has been identified in both the current and emerging Local Plans as making a contribution to meeting the Council's housing requirement. The emerging Local Plan, however, seeks to only focus additional new development in part of the North of Plan Area which does not include Kirdford.
- 1.4 In light of the Council's previously poor housing delivery and in accordance with the objectives of the NPPF, we consider that the proposed existing buffer of 128 homes (1%) is insufficient and that an increased buffer of 20% be included to provide greater flexibility and certainty that the Council's housing requirement can be met.
- 1.5 Based on the Council's own evidence we consider it is clear that there are serious supply and affordability issues within the district especially in the North of Plan Area. In addition to ensuring the Plan is sufficiently flexible we therefore consider that the Council should be seeking to optimise housing delivery in this area where such opportunities exist.
- 1.6 We have calculated the housing need for Kirdford based on the standard methodology. On this basis, the housing need for Kirdford is up to 136 new homes over the Plan Period (2016-35), a net increase of up to 76 new homes when taking into account the existing Local Plan housing figure.
- 1.7 In summary, we therefore consider that draft Policy S5 should be amended to identify a housing requirement of 75 new homes for Kirdford.
- 1.8 We consider that in light of the existing Neighbourhood Plan allocation and its location land within the control of Welbeck Land is capable of accommodating this level of residential development.

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## 2. INTRODUCTION

- 2.1 This document has been prepared on behalf of Welbeck Strategic Land IV LLP (Welbeck Land) in respect of land to the south of Townfield, Kirdford.
- 2.2 Welbeck Land has an interest in the site, totalling approximately 5 hectares, which comprises an area of former agricultural land to the south of properties fronting Townfield and Cornwood. The village of Kirdford is to the north whilst open countryside surrounds the site to the south and west with the sites eastern boundary adjacent to the rear boundaries of properties fronting Glasshouse Lane. The river Kid runs south of the site but doesn't border or cross the site. A copy of the site location plan is attached at [Appendix 1](#).
- 2.3 The site falls within the administrative area of Kirdford Parish Council (and Chichester District Council). The Kirdford Neighbourhood Plan (NP), which forms part of the development plan, was 'made' on 12 June 2014.
- 2.4 Part of the site is allocated within the NP under Policy KSS2a (Land at the southeast corner of Townfield) and Policy KSS2b (Land at Townfield). This part of the site is allocated for the provision of relocated sports pitches (cricket and football), the provision of a new and larger village hall and between 6-10 homes which together would provide a new community and recreational hub for the village. A copy of these policies and extract of the NP proposals map is attached at [Appendix 2](#).
- 2.5 Approximately 2Ha of land within the control of Welbeck Land extends beyond the extent of the existing NP allocation. In light of this allocation and sites location we consider that the site is capable of accommodating additional residential development which together with the provision of new community facilities, as envisaged by the NP, would deliver a number of benefits for the local community.
- 2.6 It is in this context that this document has been prepared with our representations predominantly focused around the Council's proposed housing requirement for the 'North of Plan Area' and Kirdford in particular.

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### 3. POLICY CONTEXT

- 3.1 The current statutory development plan includes the current Local Plan (2014) which identifies a housing requirement of 435 new homes per annum. In light of the highway constraints at this time, this housing requirement was less than the identified objectively assessed housing need of 505 new homes per annum (which itself excluded the part of the District within the South Downs National Park). Overall, a housing requirement of 7,388 new homes has been identified for the Plan period (2012-29).
- 3.2 In order to deliver this level of housing the Council's spatial strategy sub-divides the District into three areas: the east-west corridor, the Manhood Peninsula and North of Plan Area. Policy 4 states that the bulk of new housing is anticipated to be delivered within the east-west corridor to the south of the District, however 339 new homes have been identified to be delivered in the North of Plan Area. Policy 5 identifies indicative housing numbers for the 5 Parishes within the North of Plan Area, totalling 200 new homes, with the remainder presumably comprising of extant permissions and/or part of the Council's windfall allowance.
- 3.3 The Council's settlement hierarchy identifies Kirdford as a 'service village', one of five within the North of Plan Area which, the highest order settlements in this area. Service villages are defined as a local centre for services that typically provide a reasonable range of basic facilities to meet the everyday needs of local residents. Of the 200 new homes identified for the North of Plan Area, they are split broadly evenly across the service villages with 60 new homes identified for Kirdford, a figure which is reflected in the current Neighbourhood Plan. Planning permission was granted in November 2018 for 54 new homes on land to the east of Plaistow Road, Kirdford (ref: 15/03367/FUL), making a significant contribution to this target.
- 3.4 In light of the limitations of the Council's transport study, the Inspector examining the then emerging Local Plan included a commitment for an early review of the Local Plan. This was predominantly based around potential options for the upgrading of the A27. The current Local Plan is therefore being prepared on this basis.
- 3.5 The revised NPPF, published in July 2018, provides guidance on the preparation of Local Plans. The overall approach is broadly consistent with the previous NPPF (2012) however there are some changes. To determine the minimum number of homes needed, paragraph 60 states that strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. Paragraph 65 continues by stating that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

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- 3.6 The NPPF, at paragraph 68, recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote sustainable development in rural areas, paragraph 78 states that housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.
- 3.7 To maintain the supply of housing, paragraph 75 states that where the Housing Delivery Test (HDT) indicates that delivery has fallen below 95% of the local planning authorities housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years. At the time of writing, the first HDT, due for publication in November 2018, is not yet available.
- 3.8 In accordance with the NPPF, the District's housing requirement is based on the new standard methodology which identifies an annual housing target of 617 homes per annum (12,350 dwellings across the plan period (2016-35)). This represents an approximately 40% increase over the current Local Plan housing requirement. As with the current Local Plan, the spatial strategy for growth is split across the same three sub-areas with the proposed housing target for the North of Plan Area being 489 new homes, a net increase of 150 new homes.
- 3.9 In line with the NPPF, draft Policy S5 of the Local Plan provides a housing figure for each of Parish which states, unlike the current Local Plan, that the proposed additional housing in the North of Plan Area is to be focused in only 2 of the service villages (i.e. Loxwood & Wisborough Green) with no additional housing anticipated to be delivered in Kirdford. Policy S5 acknowledges that to ensure the Council delivers its housing target, the distribution of development may need to be flexibly applied.
- 3.10 In light of the need to promote sustainable development in rural areas, as set out in the NPPF, one of the three main objectives of the Council's development strategy, outlined within draft Policy S3, is to where opportunities arise support the thriving villages and rural communities in the north of the Plan Area. Also, one of the other aims of this Policy is that provision is made for local community facilities that meet identified needs within the village which would help make the settlement more self-sufficient.
- 3.11 In summary, the North of Plan Area has been identified in both the current and emerging Local Plans as making a contribution to meeting the Council's housing requirement, however the emerging Local Plan seeks to only focus additional new development in part of the North of Plan Area. The NPPF requires that housing requirements reflect the overall strategy for the pattern and scale of development, promoting sustainable development in rural areas. These matters along with issues surrounding housing supply, insofar as they relate to the North of Plan Area, are considered in more detail in the following chapters.

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## 4. NORTH OF THE PLAN AREA

### Housing Requirement

4.1 Draft Policy S4 identifies a housing requirement of 12,350 new homes across the Plan Period (2016-2035). Based on the component parts of this Policy, the Council would deliver a total of 12,478 new homes, a surplus of only 128 new homes (1%). In light of the recent performance of the Council we do not consider that this small buffer is sufficient to ensure a robust housing land supply.

4.2 Although the results of the Housing Delivery Test are not yet available, the Council's past housing performance is highlighted in paragraph 5.50 of Council's Housing and Economic Needs Assessment 2018 (HEDNA 2018). This states:

*“Over the period 2006/07 to 2011/12, 87% of the District's housing target was delivered, equating to an overall shortfall of 362 dwellings. In the four years since the current Chichester Local Plan base date of 1 April 2012, net housing completions in the Chichester Local Plan area (excluding the National Park) have totalled 1,367 net dwellings, representing 79% of the annualised requirement, a cumulative shortfall of 373 net dwellings.”*

4.3 In light of this poor performance and in accordance with the objectives of the NPPF which seeks to ensure a five year supply of deliverable sites, we consider that the buffer be increased to 20% to account for the non/delayed delivery of housing sites.

4.4 In the context of the North of Plan Area this is considered especially important as based on the 200 new homes identified by Policy 5 of the current Local Plan, 129 new homes have achieved consent (54 at Kirdford, 43 at Loxwood, 10 at Plaistow & Ilford and 22 at Wisborough Green). Only the development at Loxwood has been delivered despite the current Local Plan having been adopted nearly 5 years ago. In addition, the current Local Plan anticipates that 87 new homes in the North of Plan Area will be delivered from windfall sites which we consider to be overly optimistic given that such opportunities are likely to be limited in this part of the District. Furthermore, these sources of supply together with completions between 2012 and 2014 will still result in a shortfall of 21 new homes in this part of the District over the Plan period.

4.5 This, in our view, further supports the need for the draft Local Plan to be more flexible and ambitious in allocating sites/identifying housing numbers for individual Parishes.

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4.6 Within the North of Plan Area, Draft Policy S5 only identifies additional new homes at Wisborough Green (25 new homes) and Loxwood (125 new homes). The Council does not appear to have provided any justification as to why only the parishes of Loxwood and Wisborough Green have been allocated an additional housing figure and not Kirdford or Plaistow & Ifold. We would note that in the case of Loxwood, the current Local Plan identifies 60 new homes to be delivered at the village meaning that the village is expected to deliver a total 185 new homes yet, a 30% increase in housing stock when based on 2011 Census data. This is significantly greater than that envisaged for any of the other service villages in the North of Plan Area.

### Demographic Characteristics

4.7 We also consider it important to consider the demographic characteristics of the North of Plan Area when formulating the appropriate housing requirement for the area. This is acknowledged by draft Policy S19 which seeks, amongst other things, to safeguard existing local facilities and expand the range of local facilities.

4.8 The Council's HEDNA provides a range of demographic and housing market indicators for the North of Plan Area which. We consider that these indicators individually and collectively provide clear evidence of a lack of supply impacting upon housing affordability. Figure 5 shows the benchmarking population growth since 2002. For the North Plan Area this has been falling since 2013 which in our view could be an indicator of a lack of or constrained supply of housing in the area.

4.9 Figure 23 of the HEDNA shows a house price heat map for the whole of the district. The map shows high prices in Kirdford and the surrounding areas which indicate affordability issues in these areas, possibly due to lack of housing supply. This is further evidenced in paragraphs 5.19 and 5.20 which states *"House prices in Chichester have continued to increase at a faster rate than the national trend ... median house price growth in Chichester has also been significantly higher than the majority of the comparable areas, apart from Cotswold where the prices have been at a similar level. This suggests that house price affordability is not necessarily a new factor in the district but one that is on a worsening trend."*

4.10 Furthermore, paragraph 5.62 states *"the highest median house prices over the period have been registered for Plan Area (North) subarea, followed by the SDNP sub-area. This again reflects the rural nature of these sub areas and the larger sizes of dwellings/number of detached properties."* This is further demonstrated in Figure 35 which shows the Median House Prices by Type in 2016.

4.11 In addition paragraph 5.67 states that *"the lowest number of sales were achieved in the Plan Area (North) sub-area, where in 2016 there have only been 4 flat sales and only 106 sales in total for the remaining dwelling types. Despite having 7% of the housing stock the area has only seen 6% of the sales."*

4.12 In regards to sales in the district, paragraph 5.71 states that the north of the plan sub-area has the highest entry level prices at £383,750 out of all the sub-areas.

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4.13 In summary, based on the Council's own evidence we consider it is clear that there are serious supply and affordability issues within the district specifically in the North of Plan Area. Furthermore, we consider that attracting new residents to the area is an important part of ensuring the long term viability of existing services, an aim of draft Policy S19. On this basis, in addition to ensuring the Plan is sufficiently flexible we consider that the Council should be seeking to optimise housing delivery in this area where such opportunities exist.

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## 5. KIRDFORD

- 5.1 Having undertaken an assessment of the particular characteristics and pressures facing the North of Plan Area, we now consider the need for new housing in Kirdford based on the standard methodology, which as the NPPF makes clear, should be the starting point for establishing housing need.
- 5.2 The ONS and the DCLG published household projections represent a key input to the standard methodology for calculating housing need. Although population and household projections are only available at a local authority level, a calculation at sub-local authority area can be made using the household projections based on the household numbers in the 2011 Census.
- 5.3 At the 2011 Census, Chichester District had 49,848 households and the parish of Kirdford had 433 households which is the equivalent to 0.87% of the total households in Chichester District (rounded).
- Chichester 2011 Households: **49,848** households
  - Kirdford Parish 2011 Households: **433** households
  - Kirdford as % of District: **0.87%**
- 5.4 The standard methodology for calculating housing need has three components:
- **Starting point/baseline** - *the 2014 DCLG Household Projection (10 years growth);*
  - **Market signals adjustment** - *workplace based house price affordability; and*
  - **Capping** – *where authorities that have adopted their local plan in the last five years (like Chichester) annual local housing need figure is capped at 40 per cent above the annual requirement set out in their local plan.*
- 5.5 As none of these components are available at a sub-local authority area level, we consider it appropriate that any assessment of parish level housing need should be based upon a proportion of the wider District need. Whilst the Council's HEDNA is based on the standard methodology, neither it nor the Council's Housing Background Paper (January 2019) provide an explanation of how housing needs have been distributed between the District sub-areas.
- 5.6 As there is no explanation or calculation of housing need for the sub-areas we consider that the pro-rata approach (using the standard methodology) is a reasonable and robust estimate for calculating local housing need in Kirdford. The starting point is household growth between 2016 and 2026 which equates to 5,164 households; equivalent to 517 additional households per annum. When applied to Kirdford, it provides household growth of 45 households over ten years (5 new homes (rounded) per annum), equivalent to 100 new homes over the Plan Period.

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- 5.7 The market signal adjustment required is a median workplace based house price to median earnings ratio. The latest affordability ratio for Chichester shows that median house prices were 12.22 times the median earnings of those working in the district. This means that the adjustment factor to be applied to Chichester’s household projection is 0.51 or +51% which increases the Districts need to 7,750 new homes (775 new homes per annum). Applied to Kirdford parish this would increase the projection to 68 new homes (7 new homes (rounded) per annum), equivalent to 136 new homes for the Plan Period.
- 5.8 However, as Chichester District Local Plan is less than 5 years old a cap of 40% above adopted housing need is applied under the standard methodology, therefore reducing the housing need in the district to 609 dwellings per annum. Applying this capped need to Kirdford on a pro-rata basis establishes a need in Kirdford for 53 new homes over ten years (5 new homes (rounded) per annum), equivalent to 100 new homes over the Plan period.
- 5.9 In light of the above analysis, we consider that the housing need for Kirdford is between 100 and 136 new homes, a net increase of between 40 – 76 new homes when taking into account the existing Local Plan housing figure. Whilst the 40% cap applies is applicable, as the emerging Plan looks forward over the period up to 2035 combined with the affordability issues, particularly associated with the North of Plan Area, and the Council’s poor record of housing delivery means that we consider that the District (& Parish) Council should be aiming to deliver an additional 76 new homes in Kirdford.
- 5.10 We consider that land within the control of Welbeck Land is well placed to accommodate new residential development to meet this need. Even if the lower housing need figure is taken forward there would still be a requirement for additional sites to come forward to meet this need.

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## 6. CONCLUSIONS AND RECOMMENDATIONS

- 6.1 These representations have been prepared on behalf of Welbeck Strategic Land IV LLP who have an interest in land to the south of Townfield, Kirdford. Part of the site is allocated for community facilities and between 6-10 homes in the Kirdford Neighbourhood Plan (2014).
- 6.2 Kirdford is located within the 'North of Plan Area' as set out within both the current and emerging Local Plan. Kirdford is defined as a 'service village', one of five within the North of Plan Area, which are the highest order settlements in this area, and so is considered an appropriate location for additional residential development.
- 6.3 The NPPF requires that housing requirements reflect the overall strategy for the pattern and scale of development, promoting sustainable development in rural areas. As such, the North of Plan Area has been identified in both the current and emerging Local Plans as making a contribution to meeting the Council's housing requirement. The emerging Local Plan, however, seeks to only focus additional new development in part of the North of Plan Area which does not include Kirdford.
- 6.4 In light of the Council's previously poor housing delivery and in accordance with the objectives of the NPPF, we consider that the proposed existing buffer of 128 homes (1%) is insufficient and that an increased buffer of 20% be included to provide greater flexibility and certainty that the Council's housing requirement can be met.
- 6.5 Based on the Council's own evidence we consider it is clear that there are serious supply and affordability issues within the district especially in the North of Plan Area. In addition to ensuring the Plan is sufficiently flexible we therefore consider that the Council should be seeking to optimise housing delivery in this area where such opportunities exist.
- 6.6 We have calculated the housing need for Kirdford based on the standard methodology. On this basis, the housing need for Kirdford is up to 136 new homes over the Plan Period (2016-35), a net increase of up to 76 new homes when taking into account the existing Local Plan housing figure.
- 6.7 In summary, we therefore consider that draft Policy S5 should be amended to identify a housing requirement of 75 new homes for Kirdford.
- 6.8 We consider that in light of the existing Neighbourhood Plan allocation and its location land within the control of Welbeck Land is capable of accommodating this level of residential development.

## **APPENDIX ONE – SITE LOCATION PLAN**

# Land at Townfield



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## **APPENDIX TWO – NEIGHBOURHOOD PLAN ALLOCATION**



## Proposal 2 – Develop Lands to the southeast of Townfield as a new Village Social & Recreational Hub

### Objective and Intention (non statutory community aspiration)

- i. Relocate the existing football pitches, currently located at the northernmost edge of the village, to the lands southeast of Townfield - in order to benefit from shared facilities.
- ii. Relocate the existing cricket pitches, currently located to the east of the village opposite The Vicarage, to the lands southeast of Townfield - in order to benefit from shared facilities.
- iii. Relocate the Village Hall to the lands southeast of Townfield. Construct a new, larger Village Hall that will accommodate all the current social groups and activities, along with associated parking. The new Village Hall is to include facilities for a travelling medical surgery, provide a base for a Local Business Network Forum and communal social facilities, and provide changing rooms associated with the new recreational uses. The new hall will overlook the new open recreational area and therefore provide a sense of security.
- iv. Provide additional parking (for residents and users of the new recreational facilities) along the rear southwest boundary of Townfield, with turning head near New Barn. Provide a pedestrian only connection through to New Barn. New hard and soft landscaping to include informal, gravelled finishes and the planting of fruit trees amongst the parking bays. It is proposed that the opening up of this new access track will allow residents of Townfield backing onto the new recreational lands to develop Work/Storage Units in their rear gardens.
- v. Redevelop the existing row of garaging on the southern boundary of Townfield as new housing. This area could deliver between 5-7 units, depending on type and number of bedrooms per unit.

Construct 2-4 new dwellings (dependent on type) on lands between new Village Hall and existing Townfield garaging site. These will overlook the new open recreational area and provide a sense of security. A major community social objective is to improve social integration in the village, provide sustainable recreation facilities and establish a social centre. Proposal Map 2 illustrates a scheme to combine all Parish sports activities (releasing existing land for alternative use), and develop a new Village Hall/club house/community centre/medical day clinic/changing facilities and warden's flat, along with an element of new housing. The location is critical, as it places the social activity below the existing cluster of social housing in the village. Currently it is segregated from the main village activity. The scheme also provides access to the rear of Townfield and Cornwood, enabling those properties to create parking, garaging and workshops. This mitigates a parking problem in the existing residential area and releases a Brownfield site for a housing redevelopment scheme. This proposal also releases the existing Village Hall site for housing redevelopment.

Proposal map 2 (Illustrative purposes only)



### Policy KSS2a – Land at the southeast corner of Townfield

*A residential development comprising between 6 and 10 units on land at the southeast corner of Townfield will be supported, provided such proposals:*

- *Include a scheme of development that makes the most efficient use of land whilst respecting the rural setting of the site.*
- *Provide a sufficient proportion of affordable housing in line with District standards (the tenure split to then be determined set against local need first and scheme viability second).*
- *Provide sufficient open space and off-street parking as required by policies elsewhere within the development Plan.*
- *Provide a scheme of landscaping to the approval of the local planning authority; and*
- *Are developed in accordance with the other policies of this Plan.*

### Policy KSS2b – Land at Townfield

*The existing open space identified on the proposals map at Townfield will be safeguarded for formalisation as a community recreational hub, comprising the following elements:*

- *Football pitches, a cricket pitch and incidental open space for the benefit of the community;*
- *A new Village Hall/club house/community centre/medical day clinic and warden's flat with the ability to both serve as a facility in support of the adjacent open space as well as a direct replacement of the existing Kirdford Village Hall; and*
- *Additional sufficient parking to serve the open space and the Village Hall facility in line with policies elsewhere within the development Plan;*

*The provision of the new Village Hall, including associated parking and infrastructure, will be supported by this policy, provided that it is sensitively located and designed to demonstrate respect for the open countryside, due to its likely prominent position at the edge of Kirdford village.*

### **Reasoned Justification**

The Plan needs to address development that is sustainable, deliverable and viable. It is not required to demonstrate that it maximises development profit, especially if it also delivers community benefit. Nor is complexity in delivery a constraint. This proposal seeks to allocate existing land outside the SPA, which is currently unsuitable for development, into a mix of open space for community recreational use, community facilities and housing, whilst also resolving existing negative issues in the community. The landowners have indicated a desire to gain financial enhancement of their asset (currently agricultural land values) by way of co-operating with the community to realise its Proposal . The Parish Council owns a number of land/building assets that can be realised and which together with its PC-CLT funding opportunities can be allocated to assist in the funding and delivery of Proposal . The Proposal also allocates some land for housing development. The Parish Council and community have a proven track record of delivering complex high value sustainable development that delivers development value and operational profits.

*References:* NPPF para's. 6-10 & 69-70, KPNP-Proposals map 2, PF Report page 36. "Kirdford Village Stores" Development Costs and Annual Accounts 2010-13.

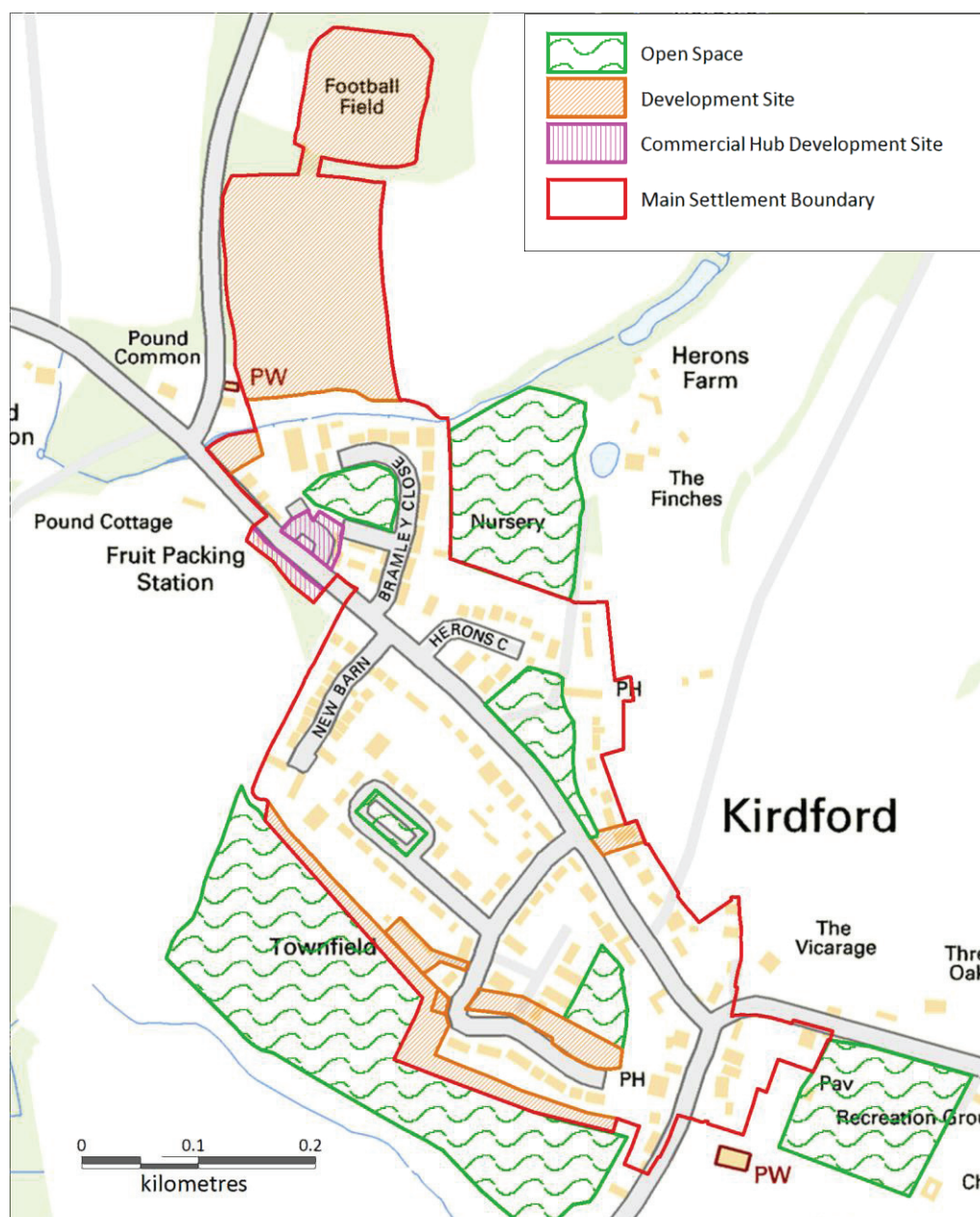
### 3.8 Site Specific Land Use Policies

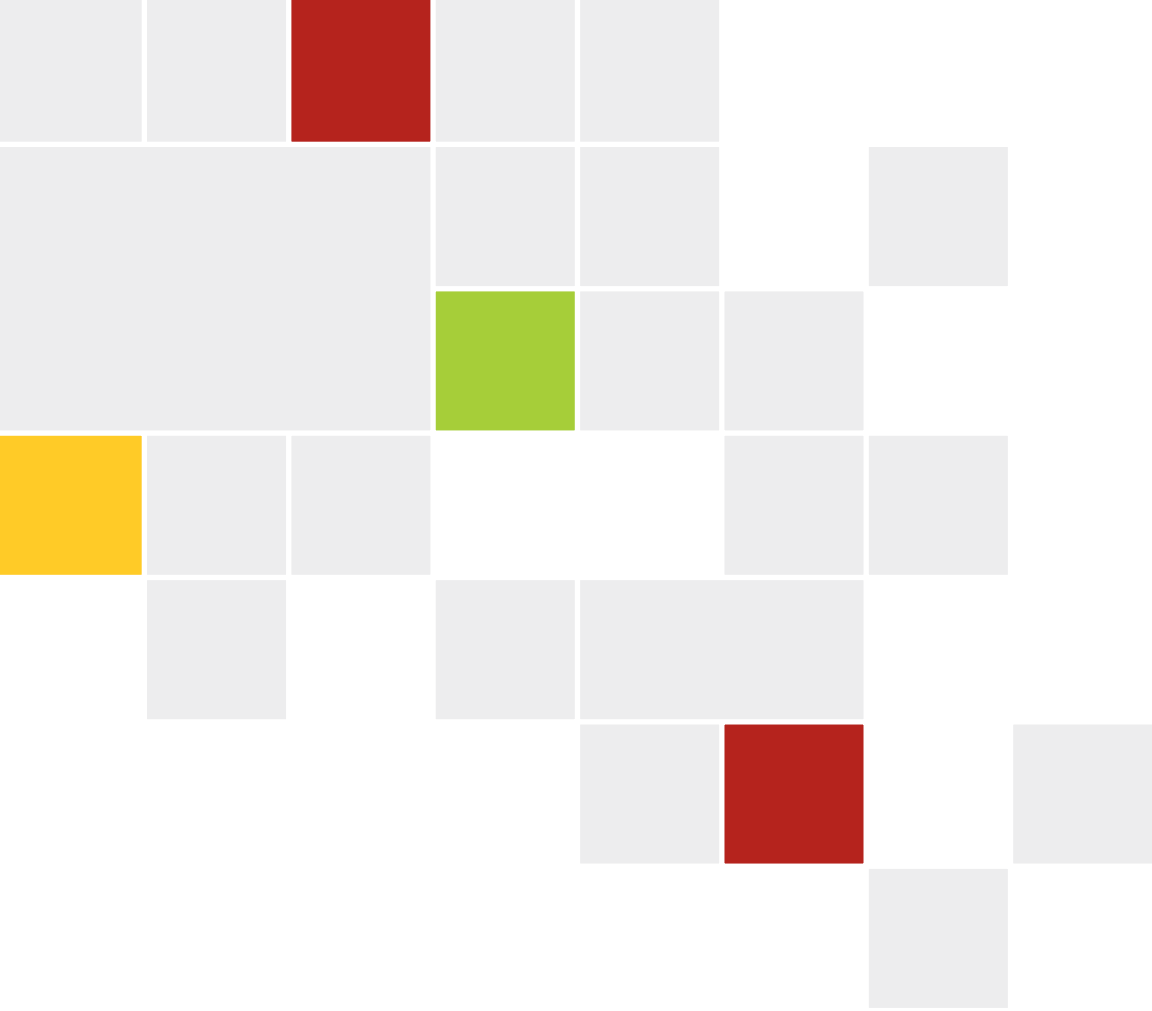
This section sets out the site specific policies of the Kirdford Neighbourhood Plan. Each of the policies consists of three parts a land use policy, supporting text setting out the objective and intention and an indicative site layout. Planning applications will be determined against the land use policies only, the intention and objective text and the indicative site layouts set out the non statutory aspirations of the community.

The sites allocated below will together deliver a minimum of 61 dwellings, the maximum number of homes that can be accommodated will be calculated on a site by site basis. The calculations will take into consideration site constraints and Chichester District Local Plan Policy.

The sites designated for development or open-space are indicated on the KPNDP – Proposals Map.

Illustration 6: Land use Development Proposals





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