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Planning Policy,
Chichester District Council,
East Pallant House,
1 East Pallant,
Chichester,
PO19 1TY

Ref. 19/050LH/LOC

7th February 2019

Dear Sir/ Madam,

CHICHESTER LOCAL PLAN REVIEW 2035: PREFERRED APPROACH CONSULTATION REPRESENTATIONS ON BEHALF OF ANTLER HOMES LTD. IN RESPECT OF LAND AT LOXWOOD

Iceni Projects Ltd has been instructed by Antler Homes Ltd. ("Antler Homes") to prepare representations to Chichester District Council's ("the Council") Regulation 18 Chichester Local Plan Review - Preferred Approach consultation. Antler Homes wishes to outline the development potential of two parcels of land at Loxwood for residential uses in the emerging Chichester Local Plan Review 2035.

These representations provide: an overview of the subject land; highlight the relevant planning policy framework; commentary on the objectively assessed need for housing; and, highlight the suitability of the land at Loxwood to assist in meeting this local housing need.

Site Context

The subject land comprises of two separate sites to the west of the service village of Loxwood, in the North of the Plan Area. The first site relates to land to the rear of Blackhall, an existing dwelling, and currently form part of the curtilage of this residential property. This site was considered in part within the Council's Housing and Economic Land Availability Assessment (2018) (HELAA) as site reference HLX0005. The site extends to c.0.8ha and is adjacent to the settlement boundary of Loxwood with residential properties to the north and south, and agricultural fields to the west.

The second site relates to land at Loxwood House. The site was considered as part of the HEELA as site reference HLX0004. The site extends to c.1.8ha and is also adjacent to the settlement boundary of Loxwood with residential properties to the east. The western part of the site currently comprises of woodland. This woodland is not subject of any Tree Preservation Orders.

Both sites are wholly located within Flood Zone 1 and therefore have a low probability of flooding.

Loxwood is a service village and the sites are located in close proximity to local amenities and services, including the village post office, store and shops. The village is also served by a primary school, doctor's surgery, village hall and public house.

Both sites adjoin the Loxwood Green development of 43 dwellings (planning application ref. 15/02012/OUT) which has been brought forward by Antler Homes.

Strategic Matters

National Planning Policy Framework (NPPF)

The NPPF 2018 promotes a plan-led approach to development with the primary objective to support the Government's objective to boost housing supply. Plans should be prepared with the objective of contributing to the achievement of sustainable development and should be prepared positively, in a way that is aspirational but deliverable [paragraph 16].

Strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing and other uses, infrastructure, community facilities and conservation and enhancement of the natural, built and historic environment [paragraph 20].

The NPPF prescribes that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area [paragraph 23].

The NPPF makes it clear that the preparation of all policies should be underpinned by relevant and up-to-date evidence, which is adequate and proportionate focused on supporting and justifying policies, taking relevant market signals into account.

The NPPF acknowledges the important contribution that small and medium sized sites can make to meeting the housing requirement of an area, as they can often be built out relatively quickly. As such, local planning authorities should promote the development of a good mix of sites. Paragraph 68 outlines a need to identify, through the development plan, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.

Section 9 of the Framework promotes sustainable transport. Transport should be considered from the earliest stages of plan. This will allow opportunities from existing or proposed transport infrastructure to be realised and opportunities to promote walking, cycling and public transport use to be identified and pursued. The planning system should actively manage patterns of growth in support of these objectives and significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes [paragraph 103].

Objectively Assessed Needs

Paragraph 11 of the NPPF states that plans should positively seek opportunities to meet the development needs of an area; and that strategic policies in plans should, **as a minimum**, provide for objectively assessed needs for housing, **as well as any needs that cannot be met within neighbouring areas**¹ where this can be achieved consistent with the application of policies in the Framework that protect areas or assets of particular importance; and it is sustainable to do so assessed against the policies in the Framework as a whole. The NPPF places particular emphasis on meeting housing needs.

Local Housing Need

The Chichester Local Plan Review's primary evidence on housing needs is set out in the Housing and Economic Development Needs Assessment (HEDNA), prepared by GL Hearn and dated January 2018. It should be noted that this document was prepared in advance of the publication of the NPPF 2018 and associated revisions to Planning Practice Guidance (PPG).

Iceni has reviewed the calculation of housing need and, it is identified the calculation of the local housing need is not consistent with the NPPF and PPG, or needs to be updated, in the following respects:

¹ Emphasis added

- a) It does not use the correct time period for the calculation of household growth – 2019 should be used as the first year for this calculation;
- b) It does not use latest data on affordability ratios;
- c) It incorrectly applies a cap which relates to a requirement figure for the plan area only rather than the District as a whole which suppresses the minimum local housing need; and
- d) It fails to recognise the true scale of housing need by applying the cap.

It is considered that the Council should test the ability to meet **at least 14,800 dwellings over the 2016-2035 plan period** (equivalent to c.780 dwellings per annum), as this is reflective of the true scale of housing need across the local plan area. Icenis consider that a lower level of housing provision than this could only be justified if the Council could convincingly demonstrate that this level of housing provision could not be either a) considered deliverable; or b) sustainably accommodated. These points are dealt with in turn below.

This level of growth (1.6% per annum) in the housing stock is one which has been achieved historically in a range of areas within the Greater South East, and is consistent with a level of growth being planned for by a range of authorities in the region. Given Chichester's market characteristics, this is a level of housing provision which the evidence indicates that the market would support. This confirms that there are not 'deliverability' issues which would justify the application of the cap to the requirement figure.

The Sustainability Appraisal for the Chichester Local Plan Review – Preferred Approach (October 2018) at Section 4 considers three different levels of development including: 650 dwellings per annum (dpa); 800 dpa and 1,000 dpa. Option 2 – 800 dpa is more closely aligned with the true scale of housing need across the local plan area (as discussed above)

It is assessed that the potential negative effects associated with the 800 dpa option are more significant than the 650 dpa option in terms of biodiversity loss and habitat fragmentation, impact on wildlife corridors, protection of water sources, requirements for new waste water treatment, use of SuDS, options to improve networks for cyclists and pedestrians, conservation and enhancement of landscape and built heritage and the loss of the Best and Most Versatile agricultural land. At the same time, the 800 dpa option could lead to more significant potential positive effects in terms of meeting local housing needs, housing mix, access to services and facilities, promoting economic development, developing economic sectors and workforce skills.

The significant positive effects should also be given adequate weight in the assessment of potential effects of the development options in accordance with the provisions of the NPPF, which indicates that a sustainability appraisal should demonstrate how a plan has addressed opportunities for net gains as part of the relevant economic, social and environmental objectives. Whilst the 800 dpa option is assessed as having significant negative effects when considered against three of Sustainability Appraisal objectives, this option has the potential to deliver significant positive effects against nine Sustainability Appraisal objectives. In comparison, the 650 dpa is assessed as having no significant negative effects and the potential to deliver significant positive effects against just two of the Sustainability Appraisal objectives.

The conclusion of the Sustainability Appraisal states that option 1 – 650 dpa is identified as a recommended preferred approach to take forward in the Chichester Local Plan Review however, taking account of the scale of positive effects that the 800 dpa option could deliver, the basis of this is questioned. The summary of effects for option 1 (para. 4.3.1) states that the primary benefits of this option are economic. However, the assessment demonstrates that 800 dpa has the potential to deliver more significant economic effects than 650 dpa therefore, the reasoning appears to be unbalanced and unfounded.

In addition to this, it would appear that the majority of the negative effects arising from option 2 – 800 dpa could be dealt with through appropriate mitigation.

Taking these factors into account, the Council should reconsider the ability to meet at least 14,800 dwellings over the 2016-2035 plan period and revise draft Policy S4: Meeting Housing Needs

accordingly as there are no apparent reasons that this level of housing provision could not be either a) considered deliverable; or b) sustainably accommodated.

Chichester Local Plan Review - Preferred Approach

This section provides the representations to specific policies of the Chichester Local Plan Review – Preferred Approach relating to the subject sites in Loxwood.

Policy S2 Settlement Hierarchy

The proposed Settlement Hierarchy identifies Loxwood as a Service Village. This has been defined based on the services and facilities available in the settlement. The Settlement Hierarchy will be used as a tool for identifying the spatial distribution of growth across the plan area.

Antler Homes **support** Policy S2 Settlement Hierarchy and the inclusion of Loxwood as a Service Village.

Policy S3 Development Strategy

The Development Strategy identifies the broad approach to providing sustainable development in the plan area. It seeks to disperse development across the plan area including where opportunities arise to support the thriving villages and rural communities in the north of the Plan Area. Loxwood can be considered as one such village in the north of the District.

This policy also provides for *“small scale housing development consistent with the indicative housing numbers set out in Policy S5”*.

Positively, it is indicated that the distribution of development may need to be flexibly applied to ensure that the Council delivers its housing target.

For these reasons, **Policy S3 is supported**.

Policy S4 Meeting Housing Needs

Policy S4 sets a housing target for the Plan Area of at least 12,350 dwellings to be delivered in the period 2016-2035. Drawing on the reasons set out in the preceding sections of these representations, it is considered that the Council should test the ability to meet at least 14,800 dwellings for the local plan period, as this is reflective of the true scale of housing need across the local plan area.

On this basis, Antler Homes **object to Policy S4** in its current form.

Notwithstanding an objection to the housing target for the plan area, the broad spatial distribution which includes housing provision in the North of Plan Area is **supported**.

Policy S5: Parish Housing Requirements 2016 – 2035

Small scale housing sites will be identified through either neighbourhood plans or a Development Plan Document to help provide for the needs of local communities in accordance with the parish housing requirements set out in this policy. The housing figure indicated for Loxwood is 125.

The allocation of a housing figure for Loxwood is **supported**, however, in light of the need for the Council to test the ability to meet a higher overall housing number for the Local Plan Area to meet the true scale of need, this should also include testing the ability of Loxwood to accommodate additional housing growth. As apparent from the Council’s Local Plan Review Background Paper – Settlement Hierarchy, Loxwood benefits from a good range of community services and facilities and is a well placed to accommodate development to meet local housing needs and help to provide the critical mass to support these existing services and facilities.

Furthermore, this would align with the objectives of Policy S3 and S4. Paragraph 3.16 sets out that Loxwood will develop its role as a larger village with development potential. New housing and employment will be focused mainly in the larger villages to help support local facilities and sustainable settlements.

Land at Loxwood

The two sites, land to the rear of Blackhall and the land at Loxwood House, are both located adjacent to the settlement boundary to Loxwood and therefore would represent a logical and sustainable extension to an existing service village and would assist in meeting the local housing needs in the Local Plan Area.

The land to the rear of Black Hall was considered to be suitable, available and achievable for housing in the Council's HEELA 2018. The assessment indicates that the site has an estimated yield of 10 dwellings at a density of c. 12 dwellings per hectare based on a site size of 0.8ha. This density is notably lower than those achieved on the adjoining sites. Feasibility work indicates the site could accommodate in the region of 25 dwellings. This site would form a logical extension to the Loxwood Green development and access can be obtained via this development access road. Any scheme would be designed sensitively to take account of the contextual landscape. This site could help the Council to meet the requirement to accommodate at least 10% of their housing requirement on sites no larger than one hectare.

The land at Loxwood House was rejected as part of the HEELA 2018 due to adverse impact on landscape. This site adjacent to the existing settlement boundary is ideally suited to accommodate housing. Any adverse impact on landscape can be effectively mitigated by means of a sensitively designed scheme that seeks to retain the wooded area covering the western part of the site, where worthy of preservation. It is estimated that this site could accommodate in the region of 30 dwellings however, the yield can be confirmed through further technical work.

Antler Homes is prepared to work with Southern Water to ensure that there is sufficient capacity provided to accommodate any future development.

The HEELA 2018 identified sites capable of delivering a yield of 109 dwellings in Loxwood. This falls short of the currently proposed target of 125 dwellings and if this figure were to increase further, additional sites will certainly be required. The two subject sites can make a meaningful contribution to meeting this housing target.

Conclusion

In summary, these representations confirm that the land to the rear of Blackhall and land at Loxwood House are available, suitable and achievable as a residential development site within the Local Plan period.

Thank you for the opportunity to respond to the Local Plan Preferred Approach consultation. We would be grateful for confirmation of the receipt of these representations and would like to register that we would like to be notified of the Council's consideration of our proposals for these two sites and future consultations in respect of the Local Plan.

Yours Sincerely,



Lorna O'Carroll

Associate

