



# THAKEHAM

Chichester District Council  
East Pallant House  
1 East Pallant  
Chichester  
West Sussex  
PO19 1TY

By email only

6<sup>th</sup> February 2019

Dear Sirs,

**Chichester Local Plan Review 2035 - Preferred Approach (Regulation 18) –  
Representations  
Land West of Guildford Road, Loxwood**

Thakeham Homes Ltd are submitting representations to the Chichester Local Plan Review 2035 as local stakeholders. Thakeham are a housebuilder based in Sussex, with a proven track record of delivering high quality, sustainable schemes across the South East.

These representations are submitted in respect of Thakeham's interests at Land West of Guildford Road, Loxwood (previously referred to as Land at Little Farm, Loxwood) ('the site'). The red line site location plan is included with this representation.

We wish to re-iterate that the site is available, suitable and achievable. The site is, therefore, deliverable in accordance with the PPG and could provide much needed housing development within the plan period.

We also wish to make representations in respect to policies relating to Meeting Housing Needs (S4), Housing Mix (DM2), Sustainable Design and Construction (DM16) and Non-strategic Parish Housing Requirements (S5).

Policy S4: Meeting Housing Needs

Policy S4 considers the Council's housing requirement for the period 2016-2035 to be 12,350 dwellings (650 dpa). This is based on the standard method which has been applied to the Council current housing requirement plus an adjustment to take account of unmet needs in the South Downs National Park. We would suggest that further consideration is required regarding the delivery of housing in neighbouring authorities and housing market areas (HMA) to ensure needs are being met in full.

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In addition, paragraph 73 of the NPPF requires strategic policies on housing delivery to include a housing trajectory. No housing trajectory is included in the consultation document. It will need to illustrate on an annualised basis housing delivery over the plan period. The Council should provide a trajectory for each allocated site to allow stakeholders to comment on the plan's effectiveness.

Whilst national policy requires all plans to include either a 5% or 20% buffer within their five-year housing land supply, it is also important that the Council provides sufficient contingency within their land supply across the plan period. This is to ensure that there is flexibility to take account of any changing circumstances, as required by paragraph 11 of the NPPF, and the potential for slow delivery. At present the Council has identified additional supply of just 128 homes. This equates to just 1%. A buffer of 20% should be included to provide sufficient contingency.

Furthermore, the plan should allocate a range of sites, in terms of size and location, that will ensure that provision comes forward evenly across the whole plan period. It's particularly important that there is sufficient supply in the early part of the plan period to provide a level housing trajectory.

#### Policy DM2: Housing Mix

The need for a mix of house types, sizes and tenures is generally supported. However, it is important to remember that whilst Strategic Housing Market Assessments (SHMA) can provide a broad snapshot in time of what is needed across an LPA or HMA they do not provide a definitive picture as to the demand for different types of homes in specific locations. As a result, the figures in the SHMA should not be translated directly into policy. Developers should have the flexibility to supply the homes they consider are necessary to meet demand. The policy should require applications for housing to have regard to the evidence on housing mix but that the final mix is left to agreement between the applicant and developer on a site by site basis.

Whilst there may need to be some homes built to the optional technical standards for accessible and adaptable homes, the Council must identify that there is a need for such homes and ensure that the application of this standard does not compromise the viability of development in the District. In addition, where the Council seeks to apply optional technical standards, these must also be considered as part of the viability assessment.

If the Council wishes to apply the Nationally Described Space Standard it should, as set out in PPG, ensure there is sufficient evidence to justify their inclusion. The space standards should only be considered as a need to have and it is important to recognise that there will be situations where well designed homes below space standards can ensure the viable delivery of a site and meet the need for new homes.

#### Policy DM16: Sustainable Design and Construction

This policy requires 10% of energy from all sites to be from renewable sources. This is not consistent with paragraph 153 of the NPPF, which states that development should comply with local requirements for decentralised energy where this is feasible and viable.

## Policy S5: Non-strategic Parish Housing Requirements

We support Policy S5 (Parish Housing Requirements 2016 – 2035) in respect of the identification of 125 units in Loxwood Parish. Loxwood has been identified as a 'service village' in Policy S2, where land for new strategic development will be identified allocated through the Local Plan Review or a neighbourhood plan. Loxwood has rightly been identified as suitable to accommodate this level of development in view of its range of services and facilities, which include a Primary School, village hall, village store and a pub.

### Land West of Guildford Road, Loxwood

The site known as Land West of Guildford Road, Loxwood (previously referred to as Little Farm, Loxwood) should be allocated for residential development within a Development Plan Document if the draft Loxwood Neighbourhood Plan (making provision for at least the minimum housing numbers of the relevant area) has not been submitted for examination within 6 months of the adoption of the Local Plan.

The site is in a sustainable location and will help to bolster housing delivery within the village of Loxwood. The site location plan is appended to this representation.

#### *Availability*

The NPPG provides the following guidance regarding availability:

*“A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that land is controlled by a developer or landowner who has expressed an intention to develop”*

NPPG Paragraph 021 Ref. 3-020-20140306

We can confirm that the site is solely within the control of Thakeham Homes Ltd.

#### *Suitability*

The NPPG provides the following guidance when considering whether a site is suitable for development:

*“Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability”*

NPPG Paragraph 019 Ref. 019-20140306

The site is located adjacent to the settlement boundary of Loxwood and could deliver much needed housing and affordable housing, contributing to the sustained vitality of the village.

In August 2018, CDC published its Housing and Economic Land Availability Assessment (HELAA) Report. The HELAA is a technical study that undertakes an assessment of land availability. The purpose of the assessment is to identify a future supply of land which is suitable, available and achievable for housing and economic development uses. It also seeks to establish realistic assumptions about the development potential of the land identified and when the development is likely to occur. The HELAA formed a key part of the evidence base for the preparation and development of options for the spatial strategy of the Chichester Local Plan Review.

The site (Ref: HLX0013) was considered in the HELAA. In summary, it was considered that (a) the site is potentially suitable subject to access and other considerations; (b) the site was submitted during the Call for Sites 2017 and is therefore considered available; and (c) there is a reasonable prospect that development would be achievable during the Plan period. It was considered that the site could accommodate approximately 60 residential units.

The site is, therefore, suitable for the delivery of residential development.

#### *Achievability*

In determining whether a site is achievable for development, the NPPF provides the following guidance:

*“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period”*

NPPG, Paragraph 021 Ref. 021-20140306

Given the acute affordability issue within the district, allocation of this site will help to ensure that the Council is able to demonstrate a continuous 5-year housing land supply.

As stated above, Thakeham has a proven track record for delivering schemes of a similar size and scale throughout the South East and has the capacity to deliver the development of the site to provide much needed new homes within the first 5 years of the plan period.

#### *Deliverability*

For the reasons above, the site is considered to be available, suitable and achievable. The site is therefore deliverable in accordance with the NPPG. As such, we consider that the site could provide much needed housing development within the plan period.

#### Conclusion

At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF. In order to make the plan sound, the following changes are required:

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- Meeting Housing Needs (S4) - Further consideration is required regarding the delivery of housing in neighbouring authorities and housing market areas (HMA) to ensure needs are being met in full. A trajectory should be included for each allocated site to allow stakeholders to comment on the plan's effectiveness. The Council should provide sufficient contingency within their land supply across the plan period. A 20% buffer is recommended. The plan should allocate a range of sites to ensure that provision comes forward evenly across the whole plan period.
- Housing Mix (DM2) - The figures in the SHMA should not be translated directly into policy. Developers should have the flexibility to supply the homes they consider are necessary to meet demand. The Council must identify that there is a need for accessible and adaptable homes and ensure that the application of such standards do not compromise the viability of development. If the Council wishes to apply the Nationally Described Space Standard, it should ensure there is sufficient evidence to justify their inclusion.
- Sustainable Design and Construction (DM16) – the requirement for 10% of energy from all sites to be from renewable sources is not consistent with the NPPF, which states that development should comply with local requirements for decentralised energy where this is feasible and viable. The policy should be amended accordingly.

We trust that these representations will be useful and clear. We would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully,



**Chris Geddes**  
**Senior Planning Manager**

Enc. Site Location Plan