



Loxwood Parish Council

Clerk: Mrs Jane Bromley
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Chichester District Council Planning Department

21st January 2019

Via email planningpolicy@chichester.gov.uk

Dear Sirs,

Chichester District Council Revised Local Plan Preferred Approach Consultation December 2018

Loxwood Parish Council (LPC) wishes to formally OBJECT to the proposed Policy S5 of Chichester Local Plan Review 2035 preferred approach, allocating an additional 125 houses for development within the Parish. This allocation being additional to the 60 already allocated in the made Neighbourhood Plan. We object on the following planning grounds: -

- i. The inadequate process used for the determination and allocation of housing within the parishes designated as service villages outside of the sub regional centre of Chichester and the settlement hub allocations for larger developments.
- ii. The disproportionate allocation of housing numbers between the parishes within the North of Plan Area, by arbitrarily selecting Loxwood as "*a larger village with development potential*" para 3.16 Chichester Local Plan Review 2035 preferred approach. In Policy S2, Loxwood is selected as a service village along with its near neighbours. The near neighbours are not then later selected as "a larger village" when their population and facilities available are broadly equivalent. Policy S3 "*seeks to disperse development across the plan area*" and "*to support thriving villages and rural communities in the North of the Plan Area*". Why then has the allocation **concentrated** on Loxwood and not been **dispersed** amongst all the thriving Parishes in the same area?
- iii. The assumption of sustainability within Loxwood Parish for the proposed housing numbers increase. Policy S19 North of Plan Area, states in the narrative 5.3 that "*Policies are required to ensure that developments will function well and add to the overall quality of the area*". You will note from the detail below that an additional 125 houses will cause severe detriment to an already overloaded foul water network impacting catastrophically on existing residents. The Sustainability Appraisal for the Chichester Local Plan Review Preferred Approach does not test Policy S5 against the long-term ability of the foul water infrastructure to cope with the additional capacity (*page 35 5.1 Assessment Matrix*).

Process of housing allocation and disproportionate allocation of numbers

As you are aware, Loxwood currently has a made Neighbourhood Plan which supports and is a part of CDC's 2014 to 2019 Development Plan formally made in July 2015. Within this plan we have accommodated the required number of 60 houses on 2 sites, one of which for 43 houses is currently nearing completion. The second is currently the subject of a planning application by the developer. The allocation of houses under the current made CDC Development Plan for parishes in the North of Plan Area were fairly and evenly distributed

amongst parishes designated as Service Villages and lesser numbers to the other smaller parishes. It follows that any increase in housing numbers required under the Government's new methodology for determining the Objectively Assessed Need (OAN) should follow a similar distribution to that already established and in the process of implementation.

Paragraph 72 of the revised 2018 NPPF document states: -

*“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. **Working with the support of their communities**, and with other authorities if appropriate, strategic policy-making authorities **should identify suitable locations** for such development where this can help to meet identified needs in a sustainable way.”*

No prior discussion or consultation with LPC about the need for or the location of any proposed increase in housing has taken place by CDC contrary to the NPPF and also contrary to Chichester District Council's (CDC) own draft Chichester Local Plan Review 2035 preferred approach document introduction which states: -

*“An essential part of the process to date has been **community engagement**. The Council's approach to involving local communities and stakeholders in formulating the Local Plan Review is set out within the Statement of Community Involvement (SCI). The Statement of Consultation sets out the key stages and outputs as the Plan has been prepared.”*

Following a meeting between LPC and CDC's Planning Department, CDC planning confirmed that the decision to allocate houses in the North of Plan Area, and probably elsewhere within the District, has been entirely developer/land-owner led through the recent call for sites predicated by the latest Housing Economic Land Availability Assessment (HELAA) exercise. No consideration of, or consultation about the housing numbers and sites being proposed has taken place with LPC prior to making their decision. Indeed, the first LPC knew about the proposed sites was in the publication of the HEELA. Parishes where no sites have been identified by local land-owners or developers, have not been allocated any additional housing numbers.

This approach adopted by CDC is contrary to their own and nationally stated policy that development should be plan led and not developer led. The approach now adopted by CDC takes into account no clear consideration of: the local housing need; the impact on the rural nature of the area; nor the sustainability aspects in particular waste water and sewage disposal, employment and transport. LPC comments further on these issues below.

In conclusion LPC believes that CDC has not followed the due process required of them under the latest planning legislation and also their own published policy documents. As such the methodology of the determination of additional housing within the North of Plan Area is seriously flawed and inconsistent with past practice. It is also inconsistent with natural fairness and proportionality which was applied in the current “made” CDC Local Plan.

Sustainability issues

On the issue of sustainability, this is a core and fundamental policy within all levels of legislation relating to development at both National and Local Authority level. The tenets of sustainability are summarised within the NPPF as Economic, Social and Environmental. Paragraph 4 of the draft Chichester Local Plan Review 2035 preferred approach document defines sustainable development as: -

- *“The pattern of need and demand for housing and employment across the area;*
- *Infrastructure capacity and constraints, in particular relating to wastewater treatment, roads and transport;*
- *Environmental constraints – avoiding flood risk areas, protecting environmental designations, landscape quality, the historic environment and settlement character;*
- *The availability of potential housing sites, their deliverability and phasing;”*

The Draft Chichester Local Plan Review 2035 preferred approach document designates the North of Plan Area as **rural** with limited employment transport and economic facilities. Despite this, Loxwood parish is described as a “larger village” with greater opportunities for development. Of the designated so-called Service Villages, Loxwood differs little from the other two Service Villages of Wisborough Green and Kirdford, having similar facilities. The definition of a service village according to CDC is: -

“Villages that either provide a reasonable range of basic facilities (e.g. primary school, convenience store and post office) to meet the everyday needs of local residents, or villages that provide fewer of these facilities but that have reasonable access to them in nearby settlements.”

There is little to differentiate the three service villages in the North of Plan Area, each having some of the above criteria.

Paragraph 4.129 of the Draft Chichester Local Plan Review 2035 preferred approach document relating to the North of Plan Area states that: -

“Accessibility to services and facilities is a particular issue for this area, with local residents having to travel significant distances for many facilities. The larger villages provide a range of local facilities and play an important role in providing services to their local communities. However, for higher order facilities such as employment, shopping, secondary schools and leisure facilities, the area mainly depends on larger settlements outside the plan area, principally Billingshurst and Haslemere, and further afield Guildford, Horsham and Crawley. Public transport serving the area is also currently very limited.”

This description confirms the fact that none of these villages are sustainable in terms of transport, employment or secondary education. The vast majority of the working population has to travel outside the Plan area or even further afield requiring the use of private cars. Any increase in housing numbers only serves to exacerbate the already limited services, the lack of employment and the limitations of schooling within the area.

Education consideration

In terms of Primary education, the Loxwood School already draws its pupils from further afield than just Loxwood, extending its reach to neighbouring villages in the North of Plan area and also into Alfold, a neighbouring village in Waverley Borough, Surrey. This is a 7-class school with a maximum potential for 210 places. However, due to normal demographic differences between the years, and its physical classroom size limitations, it can only manage about 185 places consistently. It is currently running close to maximum capacity. Taking into account current development in Loxwood and neighbouring villages, there is insufficient capacity already. Further required increases in housing numbers in Loxwood, Alfold and the surrounding area will not be able to be accommodated in the already cramped school buildings. Indeed, Loxwood Primary School has had to utilise its school library space to accommodate current class sizes.

Transport commentary

Transport facilities in the North of Plan Area are risible. There are only 2 routes which serve Loxwood. Route 42 operates once a day only Monday to Saturday to Guildford and allows only 1hr 50 mins in Guildford before the one and only return bus. Route 64 operates once per day on Mondays and Thursdays only to Horsham and allows only 1hr 55 mins before the only return. This is hardly a sustainable transport system. The result of this is that everyone in Loxwood parish who needs to travel must use private vehicles. There are no cycle routes in Loxwood parish.

Paragraph 5.2.1 of the Sustainability Appraisal mentions likely issues with the additional housing requirement for Loxwood. The narrative fails to mention the foul water situation and the flooding issues which Loxwood Parish council are working to mitigate to which surface water run off contributes. The last housing needs assessment carried out by the Rural Housing Officer at CDC failed to recognise any further need for Affordable Housing above that allocated in the Made Neighbourhood Plan at a meeting with LPC in November 2017.

Employment situation

In terms of employment, there is no large or medium scale employment within the parish. There are only a handful of smaller businesses who offer very limited employment with little capability of expansion. Their current employees do not necessarily live locally in any case. The addition of significant housing numbers to this locality will only exacerbate the congestion on roads for those residents who need to commute much wider afield for their employment. Employment cannot therefore be considered to be sustainable within Loxwood.

Waste Water issues

The issue of waste water treatment within Loxwood and the immediate surrounding area which feed into the Loxwood sewage system is already the subject of serious concern. Southern Water has consistently stated, when consulted on developers planning applications, that there is insufficient capacity within the current sewer system. Up until the latest changes in the funding of waste water infrastructure improvements dating from the April 2018 Water Act, developers were tasked to fund any required upgrades to the sewer system fully themselves. Even this approach did not address the underlying deficiencies in the existing network which is old and subject to inundation from ground and surface water at times of heavy rainfall. In the case of the second development site supported by the Loxwood Neighbourhood Plan, the Farm Close site, the cost of such infrastructure upgrade amounted to in excess of ½ million pounds. This made the whole development unviable and consequently the development has not yet gained planning consent.

The recent changes to the funding requirement on developers has done nothing to help this situation as now the burden falls on Southern Water to fund infrastructure upgrades to their systems. They will receive only a limited contribution from developers at a fraction of the previous methodology cost. Loxwood Parish Council has had two meeting with Southern Water to express their concern about this situation even in the light of current development in the area. We have been informed by representatives from southern Water at a senior management level that any funding being agreed in their 5 year forward funding programme for 2020 to 2025 is highly unlikely given their hierarchy of priorities. This means that there is no possibility of any upgrades to the Loxwood sewer network for at least until 2025 or beyond and there is no guarantee that Loxwood will be high enough in their priority lists for the next five-year period.

This is close to the end of the proposed draft Chichester Local Plan Review 2035 preferred approach document end date of 2035. The number of houses being proposed, even if

ratified by this plan, should not be allowed until the Loxwood Sewer network is upgraded to accommodate their number including surrounding developments in other areas such as Alfold and Ifold which feeds into the same system. This is a fundamental constraint to the ability to further develop Loxwood.

Environmental issues

The addition of an additional 125 houses on top of the 60+ already allocated plus windfall sites of less than 6 dwellings means that Loxwood will grow by 30% over the next 15-18 years. There will be a loss of green countryside and an increase in urbanisation of an attractive West Sussex country village contrary to CDCs own assessment of the rural nature of the area and the sustainability issue of protecting the landscape quality and settlement character.

Conclusions

Given the above comments Loxwood Parish Council believes that the addition of a further 125 houses in Loxwood is unsustainable in accordance with the definitions contained in the NPPF and the Draft Chichester Local Plan Review 2035 preferred approach document. Also, the process of allocation is flawed by the lack of adequate consultation and local involvement with CDC taking the easy option of accepting developer/land owner led site offerings without challenging other parishes to come up with a sensible offering of site availability.

In summary:

- There has been no community involvement or consultation about additional housing numbers or their location
- The apportionment of the required additional housing numbers in the North of Plan Area are disproportionate and unfair
- The North of Plan Area and in particular Loxwood parish does not meet the required elements of sustainability required on both the NPPF and the draft Chichester Local Plan Review 2035 preferred approach document for the proposed increase in housing
- Site allocations within the HELAA are developer and not Plan led

Loxwood Parish Council asks that CDC take the above comments into consideration when submitting their proposed Chichester Local Plan Review 2035 preferred approach document to the next stage of consultation and examination.

For and on behalf of Loxwood Parish Council,

J Bromley

Jane Bromley
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