



Representation Form

Local Plan Review: Preferred Approach Consultation

The consultation on the Local Plan Review: Preferred Approach will run from 13 December 2018 to 7 February 2019. The document and more information on the consultation can be viewed on our website www.chichester.gov.uk/localplanreview

All comments must be received by 11.59 pm on Thursday 7 February 2019.

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website www.chichester.gov.uk/localplanreview (**Recommended**)
- Complete this form on your computer and email it to us at planningpolicy@chichester.gov.uk
- Print this form and post it to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at planningpolicy@chichester.gov.uk or telephone 01243 785166.

PART A	Your Details	Agent's Details (if applicable ¹)
Full Name	Landline	Paul White
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Organisation (if applicable)		
Position (if applicable)		

Is this the official view of the organisation named above? Yes No

¹ Where provided, we will use Agent's details as the primary contact.

PART B

Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at:

<http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

To which part of the document does your representation relate?

Page/ Paragraph Number:		Policy Reference:	S2, S4, S5, S24
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

The 'tests of soundness' for Local Plan preparation are set out in paragraph 35 of the NPPF2. They require the 2016-35 Local Plan to have been:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

We will deal with the tests more thoroughly in the next Submission Plan but at this stage our headline comments cover the following policies in relation to Loxwood:

Settlement Hierarchy (S2), Housing Need (S4), Parish Housing Sites (S5) and Countryside (S24).

Policy S2 – Settlement Hierarchy

The Settlement Hierarchy background paper provides justification for the hierarchy in Policy 2 of the Local Plan. It forms the basis for the proposed distribution of growth by distinguishing between those settlements considered to be the most sustainable having the best range of facilities and accessibility from those with the least. Most development is focused on the former and development to meet local needs or no development whatsoever on the latter. We agree that Loxwood is properly classified as a service village in the hierarchy.

Policy S4 – Meeting Housing Needs

The identified housing need has been informed by GL Hearn's Chichester Housing and Economic Development Needs Assessment (January 2018)

The Assessment confirms the objectively assessed need (OAN) is capped at 40% above the adopted housing requirement. The Local Plan was adopted on the basis of approximately 435 dpa. Capping the OAN to 40% above the adopted figure gives Chichester a housing need of 609 dpa. The Plan actually provides for 12,350 dwellings over a 19 year period equivalent to 650dpa to meet the 609dpa plus 41dpa which are unable to be met within the District part of the National Park.

Whilst we understand the need assessment has been carried out in accordance with the standard method set out in PPG we suggest it has potential flaws as the 435dpa in the adopted plan already fails to meet need. It should also consider the un-met needs of other adjoining authorities not just the National Park.

Out of the total 12,350 dwellings, 4,400 or 35% are proposed as new strategic allocations. Given this significant reliance on large sites and the potential longer lead in times for housing delivery we therefore suggest the plan includes a trajectory for them especially as this would better comply with Paragraph 73 of the NPPF2.

In meeting need S4 includes a 'windfall small sites allowance' of 695 dwellings and a Parish sites allowance of 500 dwellings. They are both an important land supply component as they will help deliver completions on smaller sites and maintain housing supply in the short term before the larger strategic sites come forward. We welcome both.

Policy S5 – Parish Housing Sites

Parish housing allocations comprise 500 dwellings and paragraph 4.26 of the Plan says they have been distributed amongst the settlements in accordance with their ranking in the settlement hierarchy. In this regard we would query the allocation of 125 dwellings to Loxwood compared to the other settlements in the NE part of district comprising Kirdford, Plaistow & Ifold and Wisborough Green. The Settlement Hierarchy background paper scores Loxwood with 12 facilities, Plaistow & Ifold 9, Kirdford 10 and Wisborough Green 9. In our view the difference in facilities is marginal and yet the 125 dwellings at Loxwood far outweighs the other settlements as Kirdford and Plaistow/Ifold both have a nil allocation and Wisborough Green has only 25 units.

We believe a more equal distribution would be justified and would improve the Plans performance against the justified test of soundness.

With regards to S5 site selection, we appreciate this will be a matter for a future Neighbourhood Plan review or Site Allocations DPD. However we would like to take the opportunity of pointing out that 1.9ha of land with a capacity of around 33 dwellings is available on land at Loxwood House Guildford Road. This site is located adjacent to the Loxwood Nursery Neighbourhood Plan allocation

under construction for 43 dwellings.

Land at Loxwood House is not constrained by any access, infrastructure, biodiversity or landownership constraint. Should Loxwood Parish choose not to proceed with a Neighbourhood Plan Review we would invite CDC to consider it for an allocation in its next Site Allocations DPD.

S24 Countryside

Policy S24 deals with countryside and settlement policy boundaries. Not all settlements however are proposed for a settlement policy boundary review in the Local Plan. Boundaries not included will be reviewed through a subsequent Site Allocation DPD or a Neighbourhood Plan Review.

According to the Local Development Scheme the Site Allocation DPD will not be adopted until July 2022 and the timetable for other Neighbourhood Plan reviews will vary.

We object to the way the settlement policy boundary reviews are proposed to take place in the Plan. We prefer an earlier boundary review for all settlements in the Plan. A boundary amendment now could increase the supply of windfall sites in an urban area and reduce the requirement for new greenfield allocations in the later DPD or Neighbourhood Plan. A boundary amendment now could also secure benefits from redevelopment opportunities of previously developed sites or other appropriately located sites especially where they abut an existing boundary and relate more to a built up area than the surrounding countryside.

However if boundary reviews of all settlements are not to be made in the Plan we would request policy wording to the last sentence of S24 be amended as follows:

‘Defined settlement boundaries may be altered by a future development plan document and/or a neighbourhood plan. In the interim, where a boundary amendment is justified against the key requirements of the settlement boundaries background paper that should be regarded as a material consideration in connection with the submission of any planning application’.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Policy S4 - The Plan needs to include a housing trajectory of the strategic allocations to assist future monitoring of housing delivery as suggested by paragraph 73 of the NPPF2.

Policy S5 - The housing allocation for Loxwood could be reconsidered and possibly part redistributed

to the other settlements in the NE part of the District. Loxwood should however have an allocation of at least 60 dwellings which is the allocation in the adopted Key Policies Local Plan.

Policy 24 should have additional wording as suggested above.

(Continue on separate sheet if necessary)

Declaration

I understand that any comments submitted will be considered by Chichester District Council in line with this consultation and will be made publicly available on their website www.chichester.gov.uk and may be identifiable by my name or organisation, if provided.

Name (<i>print</i>):	Paul White
Date:	7 February 2019