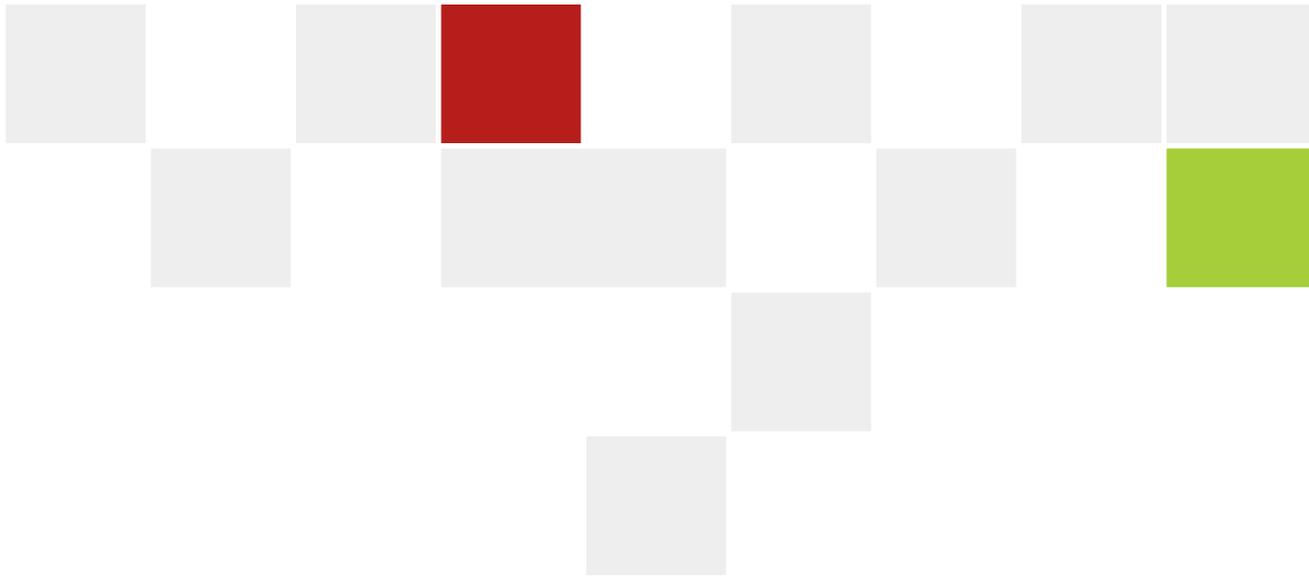


Land at Townfield, Kirdford

Chichester District Council:

Draft Local Plan Regulation 19 Consultation



Boyer

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Appendix

Appendix One - Site Location Plan

1. INTRODUCTION

- 1.1 These representations have been prepared on behalf of Welbeck Strategic Land IV LLP (Welbeck Land) in respect of land to the south of Townfield, Kirdford (the 'Site'). Welbeck Land have a controlling interest over the Site known as Land to the South of Townfield, Kirdford, which measures 5.27 ha.
- 1.2 The NPPF (2021) sets out, at paragraph 35, the four tests of soundness in which Local Plans will be assessed against. Our representations focus on the need for the emerging Local Plan to be positively prepared and be effective particularly in respect of the 'North of Plan Area', the part of the district to the north of the South Downs National Park (SDNP).
- 1.3 Kirdford is located within the 'North of Plan Area' as set out within both the adopted and draft Local Plan and is defined as a 'service village', one of five within the North of Plan Area, which are the highest order settlements in this area.
- 1.4 By way of background, an outline planning application (21/00466/OUT) was submitted proposing the redevelopment of the Site and is currently under consideration of the Council. The description of development is as follows:

Outline application (with all matter reserved except Access) for the development of up to 70 new homes, of which 30% would be affordable, new community sporting facility, new vehicular access and associated parking and landscaping.

- 1.5 These representations set out our position on the Council's proposed housing strategy for the North of Plan Area and Kirdford itself having regard to other relevant considerations including the Council's duty to cooperate with neighbouring planning authorities.
- 1.6 On the above basis, our representations are structured as follows:
 - Section 2 provides commentary on the Council's Strategy for North of Plan Area and Duty to Cooperate.
 - Section 3 provides commentary on the Kirdford Site Allocation.
 - Section 4 summaries the development potential of the Site; and
 - Section 5 sets out our conclusions.

2. HOUSING CONTEXT

Housing Requirement

- 2.1 Draft Policy H1 'Meeting Housing Needs' identifies a housing requirement of 10,350 new homes across the Plan Period (2021-2039). Based on the component parts of this Policy, it is expected that a total of 10,359 new homes will be delivered over the Plan period, a surplus of only 9 new homes. We consider that that this buffer provides a lack of flexibility especially as the overall housing requirement is expressed as a minimum within Policy H1.
- 2.2 Of this, 10,359 new homes, 679 are proposed to be delivered in the North of Plan Area (this figure includes both strategic and non-strategic sites). Overall, this represents 6.5% of the district's housing requirement (an area which contains 6.9% of the district's population).
- 2.3 Paragraph 5.1 of the draft Local Plan states "*the Preferred Approach consultation on the Local Plan was based on meeting the identified objectively assessed needs of the plan area of 638 dwellings per annum plus an allowance for accommodating unmet need arising from the Chichester part of the South Downs National Park.*" We understand that whilst it is referred to as the objectively assessed needs, based on the HEDNA (2022) this is actually the figure derived from the standard methodology (the total requirement is 763 homes per annum when including the National Park) (paragraph 18, Executive Summary).
- 2.4 Paragraph 5.2 of the draft Local Plan goes on to state: "*constraints, particularly the capacity of the A27 has led to the Council planning for a housing requirement below the need derived from the standard method, of 535 dpa in the southern plan area and a further 40dpa in the northern plan area, a total supply of 10,350 dwellings over the plan period from 2021-02039. As a result of not meeting the identified needs, the council is now unable to accommodate any unmet need from the part of the South Downs National Park within Chichester District.*"
- 2.5 In light of the above, it is evident that the Council considers that it is not possible to meet the full housing requirement given existing constraints which impact upon the southern part of the district. Notwithstanding this, we would have doubts on the effectiveness of the Council's proposed housing strategy given the lack of a buffer. In light of this, we consider the Council should look to optimise housing delivery in parts of the district which are not affected by these constraints and have the ability to assist in addressing other issues (e.g., meeting unmet from the part of the district that falls within the South Downs National Park). As such, we consider the potential for the North of Plan Area to make a more significant contribution towards housing supply.

North of Plan Area

- 2.6 We are of the view that additional housing can be delivered in the North of Plan Area given that there are several settlements here that are able to accommodate proportionate growth, such as Kirdford. We therefore support the delivery of at least 679 new homes in this part of the district and consider that for the following reasons the emerging Plan should be taking a more positive approach to housing delivery in this area.

- 2.7 We believe it is 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 P17 which seeks, amongst other things, to safeguard existing local facilities and expand the range of local facilities.
- 2.8 The Council's HEDNA (2018 & 2022) provides a range of demographic and housing market indicators for North of Plan Area. We consider that these indicators individually and collectively provide clear evidence of a lack of supply impacting upon housing affordability. Figure 5 of the HEDNA (2018) shows the benchmarking population growth since 2002 which is also set out in Table 3.8 of the HEDNA (2022). For the North of Plan Area, this is the lowest of the whole District which in our view could be an indicator of a lack of or constrained supply of housing in the area.
- 2.9 Figure 23 of the HEDNA (2018) shows a house price heat map for the whole of the district. The map shows high prices in Kirdford and the surrounding areas which indicates affordability issues in these areas, possibly due to lack of housing supply. This is further evidenced in paragraphs 5.19 and 5.20 which state *"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 prices affordability is not necessarily a new factor in the district but one that is on a worsening trend."*
- 2.10 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 Price by Type in 2016. This trend is reflected in the most recent iteration of the HEDNA (2022) with Table 6.4 identifying that the North of Plan Area has the highest house prices (and rents) of the District with Lower Quartile prices of £454,000 (against a district average of £305,000) and Lower Quartile rents of £1,070 pcm (against a district average of £775 pcm).
- 2.11 It can be seen that the North of Plan Area is facing affordability issues with the HEDNA (2022) identifying that in order to buy or rent there is a need for a household income of £90,800 or £42,800, respectively, which is significantly higher than the district average of £61,000 or £31,000 (Table 6.11). Partly as a result of this the HEDNA identifies an annual need for 27 new social/affordable rented new homes in the Area (Table 6.16) and an annual need for 19 homes in affordable ownership (Table 6.23), an overall total of 46 affordable homes per annum. The need for new affordable homes in the Area alone exceeds the proposed housing requirement for the North of Plan Area (40 homes pa) so it is clear that this need will not be met by the Plan meaning that the area will continue to face increasing affordability issues.

- 2.12 Based on the Council's own evidence, it is clear there are serious supply and affordability issues within the district specifically in the North of Plan Area. In addition, 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 P17. On this basis, in addition to ensuring that the Plan is sufficiently flexible, we consider that the Council should be seeking to optimise delivery in this area where opportunities exist.

Duty to Cooperate

- 2.13 Section 33A of the Localism Act 2011, imposes a duty on a Local Planning Authority (LPA) to cooperate with other LPA's, the County Council and prescribed bodies or other person by engaging constructively, actively and on an ongoing basis in relation to the preparation of a development plan document. It makes it clear that sustainable development or use of land that would have a significant impact on at least two planning areas is such a strategic matter, such as housing.
- 2.14 The NPPF (2021) requires Local Authorities to plan strategically across boundaries. Paragraph 26 of the NPPF (2021) states that "*effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.*"
- 2.15 Whilst it is clear that the local authorities have established a joint working approach, it is not clear what has been agreed in the respective Statement of Common Grounds. Paragraph 5.2 of the draft Local Plan states that the district is unable to meet SDNP unmet need, however it is not clear if neighbouring authorities will be able to meet any unmet demand. We therefore consider that this is another reason why in order to be considered to be positively prepared and effective the Council should be optimising housing delivery especially where these areas are geographically close to the SDNP.

3. KIRDFORD SITE ALLOCATION

Housing Delivery Mechanism

- 3.1 The draft Local Plan (paragraph 3.25) designates Kirdford as a 'service village'. Service villages are identified as a focus for new development and facilities. Kirdford contains several local amenities including two pubs, a Church, recreation ground, village hall and village store.
- 3.2 In addition, the draft Local Plan (paragraph 3.25) seeks to allocate 50 dwellings in Kirdford to come forward as part of the neighbourhood plan process. We strongly support the allocation for new homes within Kirdford however to ensure sufficient flexibility we recommend the wording of the policy should be updated to state 'at least 50 dwellings' in order to ensure that any opportunities for additional housing can be brought forward.
- 3.3 The Kirdford Neighbourhood Plan (KNP) was formally adopted in 2014. The Parish Council undertook a review of the plan in December 2020, however changes made to the plan were minor / non-material. Therefore, the formal adoption date of the plan remains 2014.
- 3.4 There is currently no indication on when a formal review of the KNP will be undertaken. As such, whilst the draft Local Plan anticipates that housing will come forward as part of the neighbourhood plan process, there is no certainty when these much-needed homes will be delivered thereby potentially undermining the effectiveness of the Plan. We therefore consider that it is imperative that a clear alternative mechanism is set out by the Plan to provide certainty on delivery.
- 3.5 Paragraph 5.5 of the draft Local Plan states that in order *"to ensure a continuous supply of housing over the plan period, a number of sources of supply have been identified. These include new strategic allocations made in this Plan, retained allocations from the adopted Local Plan 2014-2029 brought forward into this Plan), existing commitments, sites to be identified at parish level through neighbourhood plans (or DPD) and sites not yet identified that are likely to come forward through the development management process in accordance with the policies of this Plan (windfall)."*
- 3.6 On this basis it would appear that the Council will progress with a Site Allocations DPD which we consider could be an appropriate delivery mechanism subject to additional clarity being provided on how these Plans will relate to one another and what point the DPD will gain precedence over a Neighbourhood Plan (in the scenario that this is not reviewed). We consider it important that this clarity is provided at the Local Plan examination and so would wish to reserve the right to comment further on this matter.

Housing Figure

- 3.7 As stated, we support the proposed allocation of additional housing at Kirdford however for the reasons set out in Chapter 2 we consider that there is scope for Kirdford to make a more meaningful contribution towards the district's housing supply.

- 3.8 The Site subject of these representations is located immediately adjacent to the southern boundary of the existing settlement of Kirdford. As such, we consider a proposed development of up to 70 dwellings would be a natural extension to the village of Kirdford and would successfully integrate with the village.
- 3.9 The current 2021 Housing and Economic Land Availability Assessment (HELAA) identified several sites in Kirdford with potential for further deliverable housing. This included the southern half of the Site (HELAA ref: HKD0001b) for up to 40 homes in 1-5 years with the northern part of the site (HELAA ref: HKD0001a) identified as an existing allocation in the Kirdford Neighbourhood Plan for a mix of housing and community / recreational facilities. The total potential yield of the Site (both 1b & 1a) would be circa 75 homes.
- 3.10 Prior to the submission of the existing planning application for the Site, a pre-application was undertaken with the Council. Within the pre-application response, the officers stated:
- “The total potential housing yield for the whole site subject of this enquiry is 75 homes (land promoters estimate) at or about CLP benchmark density. In light of the Council’s current housing supply shortfall, the designation of Kirdford, like Loxwood as a Service Village, the failure to deliver the Policy 5 housing numbers in Kirdford under the current CLP and the indication of this site as being available and deliverable in Kirdford under the current HELAA, **officers consider that the proposed scale of development in this enquiry is not inappropriate (own emphasis).**”*
- 3.11 In addition to this and for the reasons set out in the following chapter we consider that the site has the ability to deliver 70 new market and affordable homes and as such we consider that this justifies a higher housing figure for Kirdford which would contribute towards optimising housing supply in the North of Plan Area and meeting the identified local need.
- 3.12 In light of this we consider that the housing allocation for Kirdford should be amended to state ‘at least 70 new homes’.

4. LAND TO THE SOUTH OF TOWNFIELD, KIRDFORD

Site Description

- 4.1 The Site measures approximately 5.27 ha and comprises an area of former agricultural land adjacent to, but outside of, the built-up areas of Townfield and Cornwood, as shown on the plan below.



Site Location Plan

- 4.2 The village of Kirdford is located to the north, whilst open countryside surrounds the Site to the south and west, with the Site's eastern boundary adjacent to the rear boundaries of properties fronting Glasshouse Lane. The wider area is largely comprised of agricultural and pastoral land, with patches of deciduous woodland. The river Kird runs to the south of the Site but does not border or cross the Site. Along the eastern boundary of the Site and continuing north and further west is Kirdford Conservation Area.
- 4.3 A public right of way (PROW) runs from Fordland Copse into the Site and along the southern site boundary before cutting across the Site leading north-east to exit the Site adjacent to dwellings off Cornwood and leads to the rear of the Half Moon Public House connecting to Glasshouse Lane. To the south, this PROW connects to footpath 602-2 outside the Site boundary which in turn connects to the wider network of footpaths and bridleways.

- 4.4 Part of the Site is allocated within the Kirdford Neighbourhood Plan 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 relocation of 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.

Current Planning Application

- 4.5 A planning application (21/00466/OUT) has been submitted to the Council for the following at the Site:

Outline application (with all matters reserved except Access) for the development of up to 70 new homes, of which 30% would be affordable, new community sporting facility, new vehicular access and associated parking and landscaping.

- 4.6 The application is currently under consideration of the Council and has not yet been determined due to wider issues within the district and surrounding Districts relating to water neutrality.

Development Potential

Kirdford: Service Village

- 4.7 As stated in the emerging Local Plan, Kirdford is identified as a Service Village capable of accommodating new residential development with a range of local amenities including two pubs, a Church, recreation ground, village hall and village store.
- 4.8 We consider that the proposed development would represent a 'rounding off' of the existing urban edge of Kirdford and given the degree of separation from the nearest settlement to the south, which is Petworth and is over 5km away, this means that development at the Site would not result in any actual or perceived coalescence.

Benefits of the Proposal

- 4.9 We consider that the Site has the potential of providing up to 70 new homes including much needed affordable homes.
- 4.10 The Illustrative Site Layout (submitted with the outline planning application and included below) demonstrates how a sensitive residential development could be delivered. The site is suitable, available, and developable with a potential yield of up to 70 new homes. A proposed development at the Site would deliver a significant number of benefits including:
- Provision of up to 70 homes in a mix of housing ranging from 1-bedroom apartments to 4-bedroom family houses, making a valuable contribution to the need for new housing in the district.
 - Provision of up to 21 new affordable homes (30%) in a mix of rented and shared ownership pepper potted throughout the Site;

- Provision of a new community sporting facility that will be available for new and existing residents, local groups and organisations;
- Provision of enhanced public rights of way running through the development; and
- Incorporation of a well-considered biodiversity strategy and publicly accessible landscaping, open space and natural play areas.



Illustrative Layout

Technical Work

- 4.11 The outline planning application is supported by a comprehensive set of technical reports, each of is summarised below.

Highways

- 4.12 The proximity of the Site to the existing pedestrian network and local amenities presents a good opportunity to encourage the use of sustainable transport from the development Site.

- 4.13 Access to the Site would be taken from Townfield through the creation of a bell-mouth arrangement to the immediate south of 59 Townfield from the site access is achievable to 2.4m x 43m in both directions in line with Manual for Streets guidance. Junction capacity modelling at the Site access confirms that this would operate well within capacity with minimal delay and no queuing.
- 4.14 The proposed development at the Site is anticipated to generate 37 movements in the AM peak and 34 movements in the PM peak, with 348 movements across a 12-hour period. This is a modest increase in vehicle movements, as a result of the proposed development and is considered to have a negligible impact on the operation of the Townfield/Kirdford Road junction.
- 4.15 The Transport Assessment submitted as part of the outline planning application demonstrates that the proposed development is acceptable from a highway's perspective.

Landscape and Visual

- 4.16 The proposed development at the Site has been designed to ensure that the development is set within a substantial Green Infrastructure Network. A substantial portion of the Site is proposed as Green Infrastructure (c.50%). The proposal will include new planting to enhance the existing boundary trees and hedgerows, amenity grassland, and new tree planting elsewhere within the Site. Also included is a habitat creation forming part of the sustainable drainage strategy and to suit reptiles in a dedicated area to the south-east; and retention of the existing western scrub area managed for the benefit of Dormouse. The above combine to create a high-quality development that would be successfully assimilated within its landscape context.
- 4.17 Although any development on the Site would undoubtedly alter the character of the Site itself through the loss of open space and minimal vegetation to allow for access, it is considered that the proposed residential development will not be out of scale or context with the nature of the landscape within which it is proposed to be located; within an area which is relatively well contained and subject to influences from the neighbouring development. The proposed development of the Site will include new landscape planting which will allow for enhancement of the existing boundary vegetation and a contribution to an increase in biodiversity across the Site. The proposed development affords opportunities to contribute to the distinctive character of the local area.
- 4.18 Overall, the Site is considered to have capacity to accommodate a well-designed and considered development.

Ecology

- 4.19 The Site is not designated for its nature conservation value and does not lie adjacent to any designated sites. The Site is located 1.2km from the Mens SAC and 2.7km from the Ebernoe Common SAC.

- 4.20 As part of the Ecology Assessments, several general site mitigation and enhancement measures were recommended. These included, the creation and long-term management of new high distinctiveness habitats, installation of bird nesting boxes, bat roosting boxes, reptile hibernacula, as well as incorporating holes in fences for hedgehogs which could be included as part of the detailed design.
- 4.21 There are no adverse ecological impacts arising from the proposed development which have not been mitigated within the design.

Heritage

- 4.22 The Site is considered to form part of the wider setting of the Church of St John the Baptist (Grade I Listed). However, the Site has very limited positive contribution to the significance of the Church. The proposed development will not be visible from the Church or village, with only a single restricted view of the Site planting from one corner of the churchyard. The Site does not have a particular historic connection with the Church other than it is part of the countryside within which the village is located. Therefore, the proposed development is not considered to have any impact on the significance of the Church.
- 4.23 The Site is located close the Kirdford Conservation Area but is separated by modern housing to the north-east and the row of heritage assets with considerable hedge screening to the south-east. The proposed development will not be visible from within the Conservation Area and there are no important views identified in the Conservation Area Appraisal which include the Site. There is a historic connection between the study Site and the village as the Site has been part of the countryside within which the village originated and developed over time. However, this cannot be appreciated on the ground. Therefore, the proposed development will not have an impact on the Conservation Area.

Flood Risk and Drainage

- 4.24 The Site is located within Flood Zone 1 which has the lowest probability of flooding in any given year.
- 4.25 To ensure that the proposed development does not have any adverse offsite impacts and increases flood risk elsewhere, surface water runoff will be sustainably managed and disposed of using SuDS techniques.
- 4.26 It is considered that on implementation of the Flood Risk Assessment Strategy, submitted as part of the outline planning application, the development will remain safe from flood risk and can be suitably drained for the lifetime of the development.

Arboriculture

- 4.27 The proposed development will include proposed replacement planting which will serve to complement the retained tree stock, whilst also providing enhancement to the quality and distribution of the Site's tree cover. The tree removals have been minimised through design, and compromise only low-quality elements.

Summary

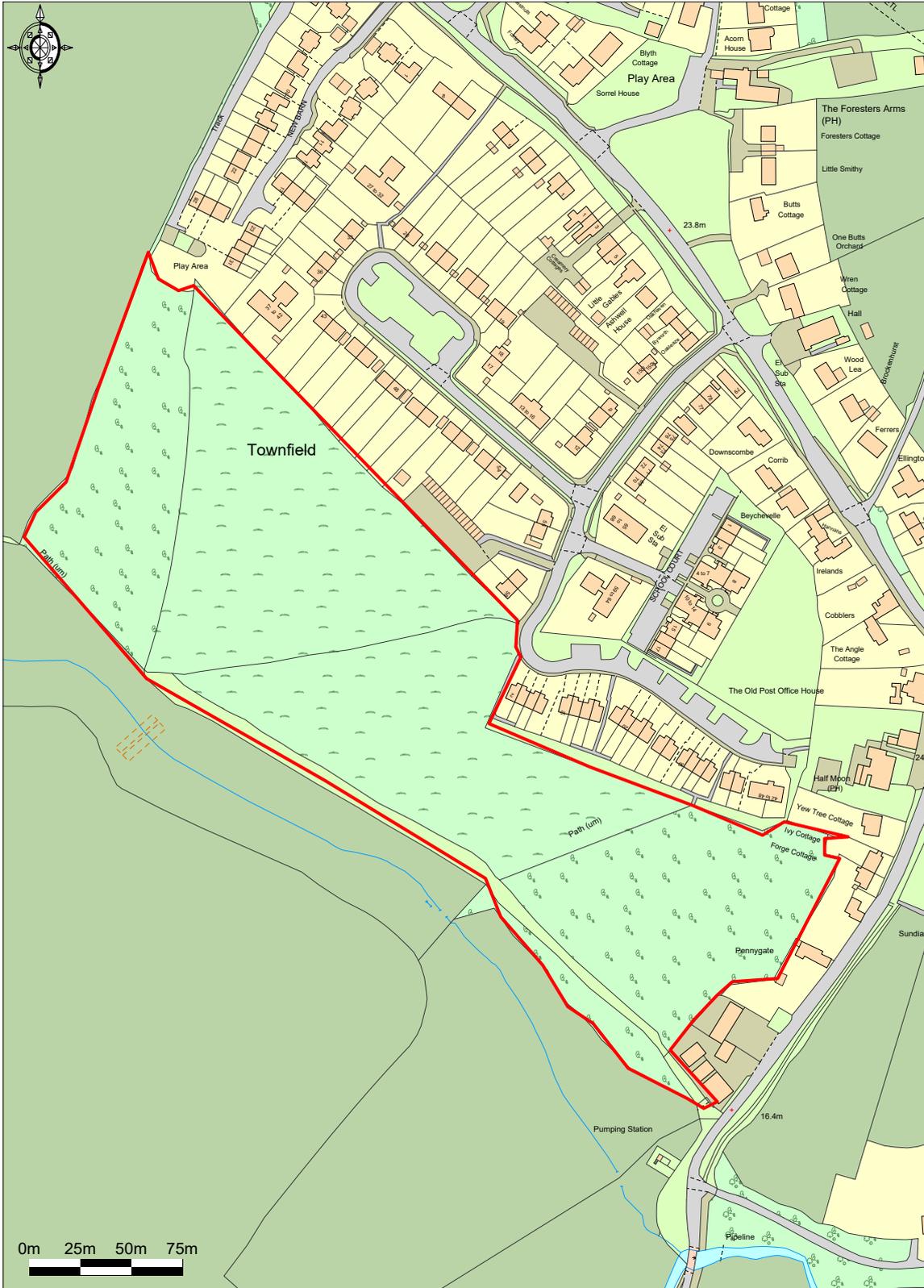
- 4.28 The above technical work undertaken demonstrates that whilst there are some limited impacts on the local area, the range of proposed mitigation measures together with the proposed layout of development, which includes extensive areas of open space and new planting, would ensure that any impact associated with development is limited.
- 4.29 On the above basis, the application process has demonstrated that there are no technical constraints to prevent residential development taking place on this Site.
- 4.30 Overall, it is considered that the proposed development is capable of delivering new residential development to meet the housing requirement for Kirdford and would contribute towards ensuring a sound Local Plan.

5. CONCLUSION AND RECOMMENDATIONS

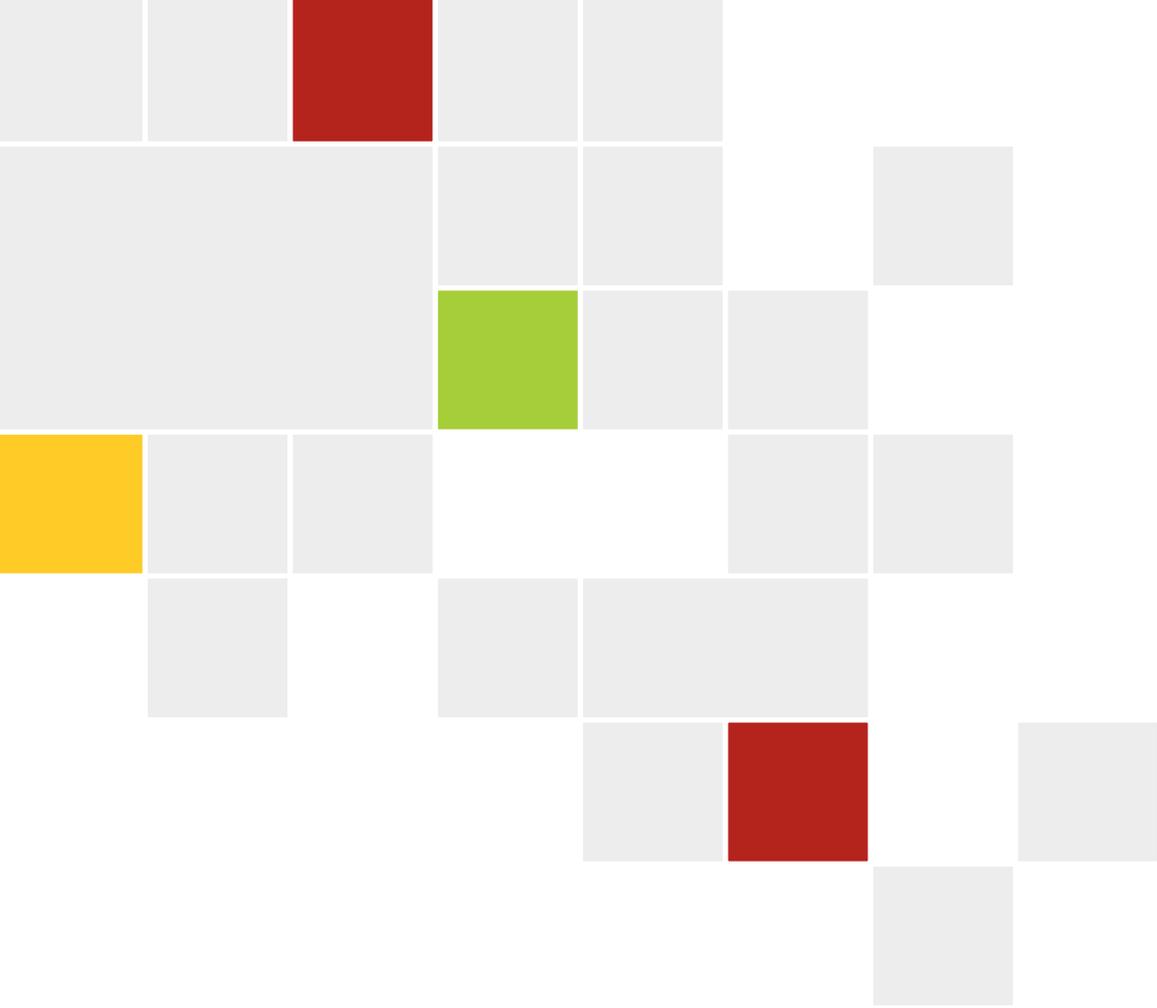
- 5.1 These representations have been prepared on behalf of Welbeck Land in response to the Council's publication of its emerging Local Plan (Regulation 19). These representations provide our comments on the Council's proposed spatial strategy, particularly in respect to the North of Plan Area.
- 5.2 The Council's proposed spatial strategy in respect to the delivery of new housing is based on delivering a level of new housing below that derived from the standard methodology. We understand that this is primarily based on constraints that affect the southern part of the district. Notwithstanding this, we consider that there is a lack of an appropriate buffer in the overall housing supply which undermines the effectiveness of the Plan. To remedy this, we consider that the buffer should be increased.
- 5.3 In addition, and to ensure that the Plan is positively prepared, we consider that the Council should be seeking to optimise the delivery of new homes in parts of the district that are less constrained.
- 5.4 In respect to the North of Plan Area and based on the Council's own evidence it is clear there are serious supply and affordability issues. Also, 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 P17. On this basis, in addition to ensuring that the Plan is sufficiently flexible, we consider that the Council should be seeking to optimise delivery in this area where opportunities exist.
- 5.5 In light of this the draft Local Plan seeks to allocate 50 new homes in Kirdford which we fully support. The Plan sets out that this new housing will be delivered through the Neighbourhood Plan process however at the current time there is uncertainty as to if or when the Kirdford Neighbourhood Plan will be formally reviewed. On this basis, we consider it important that a clear alternative delivery mechanism be set out within the Plan to ensure certainty to allow for the Plan to be considered effective.
- 5.6 Given affordability issues and the need for new housing in the district we consider that the housing requirement for Kirdford should be increased to at least 70 new homes which will assist in optimising new housing delivery in the area. Our client has a live planning application on a site that is considered suitable, available and deliverable and which would deliver a significant number of benefits in a sensitive landscape led layout.

Appendix One - Site Location Plan

Land at Townfield



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Boyer

24 Southwark Bridge Road, London, SE1 9HF | 0203 268 2018
london@boyerplanning.co.uk | boyerplanning.co.uk