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Hearing Statement – Matter 6

Subject: Chichester District Council Local Plan Examination
Matter: Matter 6 – Site Policies and Allocations
Date: September 2024
Client: Artemis Land and Agriculture Ltd

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A. MATTER 6 – AREA POLICIES AND ALLOCATIONS

1. This Hearing Statement has been prepared by DLBP Ltd, on behalf of Artemis Land and Agriculture Ltd, in response to Matter 6 (Area Policies and Allocations) of the Inspectors' Matters, Issues and Questions, and specifically Questions 254 and 256.

Question 254

2. Matter 6, Question 254 has regard to Policy A15 (Loxwood), and is repeated here for completeness:

Would Policy A15 be effective in seeking to allocate the site via the revised Loxwood Neighbourhood Plan? What would happen if it is not?

3. Policy A15 proposes approximately 220 homes to come forward over the plan period, 30% of which will be affordable housing. This would provide, on average, 4 affordable homes per annum. Crouchlands Farm, however, could provide an additional 10 affordable homes per annum over the plan period, helping to better meet this need through planned (not windfall) supply.
4. It is problematic that Policy A15 (as well as Policy H3) is overly reliant on the delivery of these additional (approximate) 220 homes in the Revised Loxwood Neighbourhood Plan.
5. The current Loxwood Neighbourhood Plan was made in 2015. There is no site allocation of this nature in the made plan.
6. There is also insufficient evidence that a Revised Loxwood Neighbourhood Plan will be prepared and made in the plan period.
7. We understand that a Loxwood Neighbourhood Plan Review is in preparation as there was a call for sites between 1 June 2024 and 13 July 2024. However, there is no evidence or certainty that this will be progressed any further, particularly in the context of the Revised 2019 Loxwood Neighbourhood Plan having been abandoned.
8. The abandoned Revised 2019 Loxwood Neighbourhood Plan allocated “a minimum of 126 no. new dwellings on allocated sites [...] In addition, 17 no. dwellings are carried forward from the previous Neighbourhood Plan, making a total of 143 dwellings allocation in this revised Neighbourhood Plan...”. Thus, even if the Plan were progressed, and if this same approach were to be taken, there would be a shortfall of sites.
9. It also must not be forgotten that the Planning Advisory Service also advised that too much emphasis was being placed on neighbourhood plans as a mechanism for delivery of housing (paragraph 4.24 of the Housing Distribution Background Paper). This advice was given between the Regulation 18 and Regulation 19 stages, yet that advice appears to have been disregarded.
10. It is thus ineffective to rely on a Neighbourhood Plan allocation being made. Rather than relying on allocations coming forward in subsequent plans that are not yet being progressed, additional housing sites should be allocated in the emerging Local Plan, including in the North of the Plan area (e.g. Crouchlands Farm).

Question 259

11. Matter 6, Question 259 has regard to Policy A15, and is repeated here for completeness:

Are the suggested Main Modifications necessary for soundness?

12. Amendment CM345 updates Policy A15 to ‘approximately 220 dwellings’ rather than a ‘minimum of 220 dwellings’. This amendment thus enhances unsoundness of the Plan even further as it is ambiguous and could allow for even less development to come forward in the North of the Plan area.
13. Whilst we appreciate that planning permission has been granted for 32 homes in Loxwood, the amendment could impede the 40 homes per annum figure that the Council is seeking to deliver in the North of the Plan area. We have already made the case in our response to Matter 4C that the 40 homes per annum provision is already far too low in the context of the achievable higher growth scenarios in the Sustainability Appraisal.
14. The amendment is also inconsistent with Policy H2 that defines 220 dwellings. This inconsistency is ineffective as it creates ambiguity.
15. The policy should be amended to be definitive and remove ambiguity so that it is effective and sound.