

# **Consultation Statement**

## **Loxwood Neighbourhood Plan (Review)**

### **December 2020**

#### **Introduction**

The Loxwood Neighbourhood Plan has been prepared by a Steering Group comprising of local residents and parish councillors on behalf of the Parish Council. The Neighbourhood Plan (NP) is a land use planning document which will influence development in the Neighbourhood Area which covers the entire parish of Loxwood.

The original Loxwood Neighbourhood Plan was adopted in 2015 having been through an extensive engagement process with local residents, businesses, organisations and other key stakeholders. In light of changes to national and local planning policy, the Parish Council has decided to review the Neighbourhood Plan, ensuring it is up to date and provides a robust framework against which to assess planning applications in the parish.

This Consultation Statement has been prepared in order to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 (as amended) Section 15(2). Part 5 of the regulations sets out what a Consultation Statement should contain:

- a) Details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan;
- b) An explanation of how they were consulted;
- c) Summarises the main issues and concerns raised by the persons consulted; and
- d) Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan.

Further to this, National Planning Practice Guidance provides advice on the process for making 'substantive' changes to a Neighbourhood Plan which requires a further Regulation 14 consultation, examination and potentially a referendum. It also advises that the qualifying body is required to provide a statement on whether they believe that the modifications are so significant or substantial as to change the nature of the plan and give reasons.

In this case, the Parish Council consider that the material modifications to the Plan are so significant or substantial that they change the nature of the plan for the reasons set out below. A statement to this effect is included within the Neighbourhood Plan also.

- The significant increase in housing numbers imposed by CDC and the subsequent additional allocated sites
- Significant amendments to policies / new policies

This Consultation Statement details the consultation process undertaken which, like for the original NP, involved engaging with residents of the parish as well as other stakeholders.

## Early Consultation

### Public Meeting

Loxwood Parish Council held a public meeting in December 2018 to discuss Chichester District Council's proposal to allocate a housing target of 125 new homes for the parish in its draft Local Plan. Over 125 residents attended the meeting. At the meeting it was decided unanimously by those attending the meeting to update the Loxwood Neighbourhood Plan to reflect the increased housing allocation.

In March 2019, the Loxwood Neighbourhood Steering Group (LNPSG) was set up to co-ordinate the work of revising the NP, comprising 4 parish councillors and 4 residents of the parish, with the parish clerk acting as secretary.

### 'Call for Sites'

In December 2019, the LNPSG issued a 'Call for Sites' which closed on the 17 January 2020. The 'Call for Sites' was advertised on the parish council website (see below), the parish newsletter (Appendix 2) and the 'Call for Sites' form (Appendix 1) was sent to all known landowners/developers.

*Loxwood Parish Council  
Neighbourhood Plan Steering Group  
**Call for Sites***

*The Neighbourhood Plan Steering Group is working on an updated and revised Neighbourhood Plan to take into account the requirement by Chichester District Councils requirement for additional housing in Loxwood published in their emerging Local Plan.*

*Accordingly, the Steering Group is issuing a "Call for Sites". Each new site put forward to the Steering Group will be assessed against a strict set of criteria so that the best sites are chosen for any new development.*

*Once the site assessment has taken place, extensive consultation will take place within the Parish.*

*The Site Proposers' nomination and information form is available to download. Forms to be returned by 17th January 2020*

*Forms should be returned to the Parish Council Clerk: [clerk@loxwood-pc.gov.uk](mailto:clerk@loxwood-pc.gov.uk) or by Post to Loxwood Parish Council, Foxways, Pinkhurst Lane, Slinfold W Sussex RH13 0QR.*

The 'Call for sites' process identified a list of 10 potential sites which were considered through the NP.

A rigorous site assessment process was then undertaken using a template and guidance material provided by Locality, a nationally accepted resource on neighbourhood planning. The site assessments were validated by an independent planning consultant. Eight of the sites assessed were considered to be sustainable and deliverable. The site assessments are available on the LPC web site under the neighbourhood planning tab.

### Questionnaire on Sites for Development

To inform the site allocation process, in June 2020 the sites were presented to the local community. A letter was sent to residents (Appendix 4) along with a questionnaire (as seen in Appendix 5) to gather feedback on individual sites as well as asking residents to identify their preferred sites in order of preference. The questionnaire also gave an indicative number of dwellings for each site.

The questionnaire was advertised on the parish council website and also delivered to every household in the parish with a stamped address reply envelope included with the questionnaire. The individual site assessments were also made available on the parish council website to inform this process. 373

responses were received (670 households in parish) and a comprehensive analysis of the responses was undertaken by the steering group. The responses to individual sites can be seen in Appendix 5.

The analysis of the responses informed the site selection process with 4 sites identified for allocation in the revised NP. In addition to those sites identified through the 'Call for Sites', two sites were carried forward from the current made NP (Land South of Farm Close and the commercial land at Nursery Green).

### Presentation to Community

Because of the restrictions on public meetings due to the Covid 19 pandemic and the need to maintain social distancing, it was not deemed appropriate to hold open day events where residents could study presentation boards, mingle and ask NPSG members questions.

As such, on 5<sup>th</sup> and 6<sup>th</sup> September 2020, a community meeting was held at North Hall setting out the work undertaken to date on the Revised Neighbourhood Plan, the main themes of the Plan and to present the findings of the site assessment process and to present the main draft policies. Four separate PowerPoint presentations were held and, after each slide, the presentation was paused to allow residents to ask questions. The steering group noted each question/comment so that they could be analysed and incorporated / taken into account in the NP, as necessary.

A copy of the questions together with the presentation can be found on the parish council neighbourhood plan website.

The number of residents for each presentation was restricted to 20 with an average of 16 residents attending each presentation, giving a total of approximately 64 residents attending over the 2 day period.

A flyer was distributed to every household in the parish. A copy of the flyer can also be found on the LPC neighbourhood plan website.

In order to cater for those residents who could not attend the public meetings, a webinar was held on the 7<sup>th</sup> September with the same PowerPoint presentation. 15 residents attended the webinar.

### Additional Consultee Engagement

In addition to the community consultation set out above, the steering group has also engaged with various other key consultees in progressing the Neighbourhood Plan. This includes:

- 1) **Meetings with CDC** - At the beginning of the NP process (20 August 2019), a face to face meeting with CDC was held at Chichester. Attending were Chris Agar, Tony Colling, Valerie Dobson and Toby Ayling. Another similar virtual meeting with same attendees was held on Friday 4 December 2020.
- 2) **Meetings/ discussions with CDC members** - Both district councillors attend the PC meetings each month where the PC and district councillors are updated on the progress on the NP. The NP is a standard item each month on the PC agenda.
- 3) **Engagement with other stakeholders** - Through the auspices of the Flood forum, meetings have been held with Southern water, CDC and WSCC to discuss foul and surface water issues.

This has informed the relevant policies. Minutes of some meetings are on the PC web site. A number of informal meetings have taken place involving our flood consultant.

- 4) **Any other communications to inform the NP** - The Loxwood Society is the main local society in the parish and it publishes newsletters which are delivered to every house in the parish. The newsletter is used to update the parish on topical subjects including the NP. The Society has an AGM at which an update on parish issues (including the NP) is presented to those attending. Usually approx. 50 residents attend as, after formal business is concluded, the event turns into a social event with bar and BBQ

## **Regulation 14 Consultation**

### **Covid 19 Pandemic**

Updated planning guidance was published in May 2020 recognising the implications of Covid 19 on neighbourhood planning, including the following guidance on public consultation:

- *The Neighbourhood Planning (General) Regulations 2012 require neighbourhood planning groups and local planning authorities to undertake publicity in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area at particular stages of the process. It is not mandatory that engagement is undertaken using face-to-face methods. However, to demonstrate that all groups in the community have been sufficiently engaged, such as with those without internet access, more targeted methods may be needed including by telephone or in writing.*
- *There are also requirements in the Neighbourhood Planning (General) Regulations 2012 that require at some stages of the process for neighbourhood planning groups and local planning authorities to publicise the neighbourhood planning proposal and publish details of where and when documents can be inspected. It is not mandatory for copies of documents to be made available at a physical location. They may be held available online.*

This guidance essentially clarified that the regulatory requirements, including at Regulation 14 and 16, can still be met without face to face engagement events (albeit with extra focus required to engage groups without internet access) and that copies of documents published as part of consultation processes do not need to be made available at a physical location.

### **Consultation Process**

The Regulation 14 consultation took place between **28<sup>th</sup> September and 9<sup>th</sup> November 2020**.

With regard to the updated NPPG guidance relating to Covid 19 (as referred to above), in order to engage as fully as possible (including hard to reach groups during the Covid 19 pandemic), various forms of advertisement / engagement were undertaken:

- a. Paper copies of the revised NP and the comments form were made available in the local shops and the village pub and could be viewed during opening hours.
- b. Five A0 notice boards (see below) were placed throughout the parish advertising the consultation, the location of where paper and electronic versions of the revised Neighbourhood Plan and comments form could be obtained.

- c. Two 3 metre long banners (see below) advertising the consultation were erected in the centre of the village and at the village hall.
- d. The consultation was advertised on the parish council website and RH Fourteen, a magazine (Appendix 7) which is delivered free of charge to all households in the parish.
- e. A copy of the RH Fourteen advertisement was posted on the Loxwood information Facebook page which has approximately 1200 members.
- f. The Neighbourhood Plan and comments form were made available on the parish council website
- g. A flyer was distributed to every household in the parish. A copy of the flyer can also be found on the LPC neighbourhood plan website.



Figure 2 - Reg 14 advertisement board



Figure 1 - Reg 14 advertisement board

# Public Consultation

Have your say about the future of Loxwood  
Neighbourhood Plan consultation 28<sup>th</sup> September  
to 9<sup>th</sup> November 2020

View the Plan at <https://www.loxwood-pc.gov.uk/neighbourhood-plan.html> and download the comment form. Paper copies available at Loxwood Stores, John Murray butchers, The Onslow and Sir Roger Tichbourne pubs

e-mail comments to [clerk@loxwood-pc.gov.uk](mailto:clerk@loxwood-pc.gov.uk)

Figure 3 - Reg 14 advertisement

Along with the Neighbourhood Plan, all of the consultation documents listed below were also made available on the neighbourhood plan web page.

- Draft Neighbourhood Plan
- Sustainability Appraisal / Strategic Environmental Assessment
- Site Assessments

- Site Assessment Summary Spreadsheet

A notification of the consultation was sent to all applicable developers, landowners and statutory consultees, as required through the Neighbourhood Plan Regulations. A list of statutory consultees can be seen in Appendix 8 along with contact details.

A comments form was produced which asked residents and consultees whether they supported or did not support the Neighbourhood Plan and sought a response to individual policies. The comments form can be seen in Appendix 6.

Further to the consultation form, the parish council also accepted other responses by email and letter (to the parish clerk's address).

The steering group analysed every consultee comment and a summary of the responses received can be seen below. Full responses and additional rationale / comments and subsequent action / changes to the Neighbourhood Plan can be found in Appendix 9.

#### Summary of responses / actions

Policy	Comments	Comments / Actions
1	Various comments from residents raising concern over the parish housing allocation Housing target should be increased	LPC has no control over the allocation by CDC Minor amendments made for clarification purposes
2	General support for policy albeit some concern over the parish housing allocation Concern raised by CDC over change to settlement boundary Historic England consider the change to settlement boundary to be in keeping with the character of the village but raise concern over inclusion of moat with the SB	The Settlement Boundary in the adopted plan was drawn to encompass the allocated sites. This is the general approach taken with all Neighbourhood plans. Reference to moat to be added No changes to policy necessary
3	General support for policy Concern over impact on flood risk, infrastructure, education provision. Concern over loss of countryside Individual objections to specific sites Comment from site proponent for Land Rear of Black Hall objecting to separation of the sites subject to policies 5 and 8 and request number of units is increased on the Land Rear of Black Hall sites Other sites should be included Some concern raised (by Waverly Borough Council) over impact of allocated sites on local highway network	Comments noted Sites are required to be allocated to meet parish housing target and there is insufficient space within the settlement boundary to accommodate. Site allocations in the draft plan to remain and note some of the sites have planning permission The number of units proposed for Land Rear of Black Hall is commensurate with the density policy (14) and the planning application for the site/s has not been decided. The sites identified in the policy are those assessed as suitable and preferred by local residents. No further changes deemed necessary

4	<p>General support for policy          Specific comments made in relation to archaeology (Historic England), doctors surgery parking provision, underground water infrastructure (Southern Water)          The site is not shown on map in Appendix 1          Minor drafting errors pointed out</p>	<p>Policy amended in line with Southern Water comments          Previous application found no evidence archaeological remains          Other minor amendments to policy made and site included in allocations map</p>
5	<p>General support for policy and provision of commercial store          Comments made relating to parking provision for the commercial store, the devising /height of the building          Request from site proponent of Land Rear of Black Hall to merge this policy with site allocation 8          Comments made in relation to the consistency with a current planning application encompassing sites 5 and 8</p>	<p>Policy references to current planning application removed          Height is similar to a previously approved planning application for a commercial store on the site. The site allocation (and other policies in the NP) will ensure the design is in keeping with the character of the village          Land Rear of Black Hall was put forward as a separate site through the Call for site Process          Parking is better suited and safer located on the commercial site</p>
6	<p>General support for the site          Some concern over loss of countryside          Comments made in relation to existing underground water infrastructure and site density (by Historic England)          Various minor drafting comments and clarifications raised</p>	<p>Various updates made to the policy in response to comments          Southern Water's suggested criteria added</p>
7	<p>General support for the site          Concern over safety of site access          Some comments / concerns raised in relation to the impact on heritage assets and archaeology (by Historic England), affordable housing provision (CDC)          Various minor drafting comments and clarifications raised</p>	<p>Site already has outline planning consent where highway safety was assessed          Archaeology requirements added to policy          Various updates made to the policy in response to comments</p>
8	<p>General support for the site          Footpath should be maintained          The site should be merged with site 5 to align with the current planning application          Various comments made in relation to the site density / housing numbers, impact on locally designated heritage assets (Black Hall)          Various minor drafting comments and clarifications raised</p>	<p>The density is commensurate with the density policy (14) and the planning application for the site/s has not been decided.          Land Rear of Black Hall was put forward as a separate site through the Call for site Process          Various updates made to the policy in response to comments</p>
9	<p>General support for the site          Southern Water requested an additional policy criteria          Historic England questioned whether Loxwood House was a heritage asset</p>	<p>Southern Water's suggested criteria added          Loxwood House is not a heritage asset          Various updates made to the policy in response to comments</p>

	Various minor drafting comments and clarifications raised	
10	General support LGSs are essential to maintain village feel Some additional sites suggested Comments made querying whether any of the site were heritage assets	Additional sites suggested are not appropriate, being residential garden land None of the sites are heritage assets
11	General support	No changes made to the policy
12	General support for policy and concern over mains water and sewerage capacity constraints Various comments made by Southern Water including requesting the removal of various points The supporting text should be placed in a separate document and uncertainty over how the local approach set out in the policy can be implemented	Policy amended in line with Southern Water's comments Policy split into Foul Water (12) and Surface Water (13) Clarifications / amendments made to the policy and PC flood risk model references restricted to information purposes only
13	General support for the policy A restrictive density is inappropriate	Density target is considered appropriate for the village Amendments made to policy to make it more flexible
14	General support for policy New development must enhance the local environment	Some minor updates made to the policy in response to comments
15	General support for policy Uncertain what 'views' are being protected Various detailed comments made – further clarity required if the canal is identified as a local heritage asset (Historic England)	Policy amended and map added to appendix to clarify the views which the policy seeks to protect
16	General support policy and re-using existing buildings Various comments made in relation to self-build housing Comment made by Historic England requesting an additional criteria to protect heritage assets	Self-build housing comments are not directly relevant to this policy New policy criteria added in response to HE comments
17	General support for the policy New extension should match the village character Comment made by Historic England requesting additional criteria relating to listed buildings Various minor drafting comments and clarifications raised	Policy amended in line with HE comments Various updates made to the policy in response to comments
18	General support for the policy Various comments made in relation to self-build housing	The Neighbourhood Plan does not prohibit or restrict self-build housing No changes made to the policy
19	General support for the policy Various detailed comments made in relation to the drafting of the policy and its implementation (CDC) Onerous policy - this detail should be dealt with by planning conditions	Various updates made to the policy in response to comments
20	General support for policy	Cycle lanes have been demonstrated to reduce traffic speeds and can be

	<p>Various comments made highlighting traffic speed, parking and safety concerns</p> <p>Comments made raising concern over provision of cycle lanes</p> <p>Funding for off site highway works should be dealt with through the planning application and secured through s106 contributions / CIL and should directly related to the development</p> <p>Comments made in relation to the implementation of the policy</p> <p>Various minor drafting comments and clarifications raised</p>	<p>shared with vehicular traffic so as not to impede traffic flow.</p> <p>References to s106 contributions and CIL separate d</p> <p>Various updates made to the policy in response to comments</p>
21	<p>General support for the policy</p> <p>The open spaces requirements are not consistent with CDCs Planning Obligations SPD</p> <p>Various minor drafting comments and clarifications raised</p>	<p>Policy amended to reflect SPD</p> <p>Various updates made to the policy in response to comments</p>
Other	<p>Various other general comments made including detailed objections in relation to compliance with the basic conditions</p>	<p>Specific responses to these matters can be seen in the appendices</p>

Further to the above, it is also noted that through the original Neighbourhood Plan consultation process, extensive consultation was undertaken to inform the scope and themes of the Neighbourhood Plan as well as refine the policies (further details of this process can be seen in the Consultation Statement for the original Loxwood Neighbourhood Plan). The vision and objectives of the Plan have not changed significantly and so this process has not been undertaken again in full.

Not all policies were amended through the review of the Neighbourhood Plan. For those policies that have been amended, in most cases the general direction of the policy has not changed and specific changes to policies were presented to local residents at the public meeting in September 2020 where feedback was sought in order to inform the final version of the plan. The same is the case for new policies, including the site allocations which also went through a further consultation process.

### **Consultation Summary**

As set out above, during challenging times, it is evident that the Neighbourhood Plan Steering Group has undertaken extensive engagement with key stakeholders with an interest in the parish and the Neighbourhood Plan. The views of these consultees have been taken into account in refining the Loxwood Neighbourhood Plan which will now be submitted to Chichester District Council for an independent examination.

### **Document compiled by**

**Loxwood Neighbourhood Plan Steering Group**

**December 2020**

**Appendix 1**



Loxwood Parish Council

email: [Clerk@loxwood-pc.gov.uk](mailto:Clerk@loxwood-pc.gov.uk)

[www.loxwood-pc.gov.uk](http://www.loxwood-pc.gov.uk)

Loxwood Neighbourhood Plan

Call for Sites Information Template

*Loxwood Parish Council Neighbourhood Plan Steering Group is preparing a revision to the existing Neighbourhood Plan and wishes to identify potential additional housing sites alongside those already identified in the Plan. If you have land available for development, the Steering Group would like to hear from you. Please download and complete this template and return it by post or email to: Jane Bromley, Clerk, Loxwood Parish Council, Foxways, Pinkhurst Lane, Slinfold, Horsham. RH13 0QR.*

[Clerk@loxwood-pc.gov.uk](mailto:Clerk@loxwood-pc.gov.uk)

*Sites put forward will be subject to a site assessment procedure to ascertain suitability.*

*This template should be returned by the 17<sup>th</sup> January 2020*

Site name:

Site address:

Ownership(s):

Site Proposer and relationship to owner:

Is the site under an option agreement?

Site Plan: Provide a separate site and location plan at 1:1200 and 1:25000 scales respectively and include a red line around the boundary of the site:

Site area in hectares:

Proposed number of houses:

When is the site available for development:

Are there any barriers to delivery of the site e.g. legal issues, contamination, covenants, public footpaths within the site, demolition of existing buildings, overhead power lines etc:

Any special circumstances to promote use of site for housing:

Appendix 2



# Loxwood Parish Council

c/o Foxways, Pinkhurst Lane, Slinfold, Horsham, West Sussex. RH13 0QR

Clerk: Jane Bromley

Tel: 01403 791323 email: [Clerk@loxwood-pc.gov.uk](mailto:Clerk@loxwood-pc.gov.uk)

[www.loxwood-pc.gov.uk](http://www.loxwood-pc.gov.uk)

**HAPPY CHRISTMAS** to all in Loxwood from the Parish Council and they hope for a safe and healthy New Year to all.

**PARISH COUNCIL OPEN SESSIONS** A reminder the Parish Council will be holding an Open session in November. This is the first of such sessions will be from 6pm to 7pm on 2<sup>nd</sup> December; 6<sup>th</sup> January; 3<sup>rd</sup> February. The sessions will be in the Committee Room at North Hall and if they prove useful to the Parish will be continued and lengthened.

**NEIGHBOURHOD PLAN** Work continues on revising the Loxwood Neighbourhood Plan and the Steering Group are calling for sites to assess for potential inclusion in the updated Plan:

## *Loxwood Parish Council*

### *Neighbourhood Plan Steering Group*

#### *Call for Sites*

*The Neighbourhood Plan Steering Group is working on an updated and revised Neighbourhood Plan to take into account the requirement by Chichester District Councils requirement for additional housing in Loxwood published in their emerging Local Plan.*

*Accordingly, the Steering Group is issuing a "Call for Sites". Each new site put forward to the Steering Group will be assessed against a strict set of criteria so that the best sites are chosen for any new development.*

*Once the site assessment has taken place, extensive consultation will take place within the Parish.*

*The Site Assessment nomination form will be available to download from the Parish Council web site from the middle of December. The web site address is: <https://www.loxwood-pc.gov.uk>*

*Forms should be returned to the Parish Council Clerk: [clerk@loxwood-pc.gov.uk](mailto:clerk@loxwood-pc.gov.uk) or by Post to Loxwood Parish Council, Foxways, Pinkhurst Lane, Slinfold W Sussex RH13 0QR.*

**PARISH COUNCIL MEETINGS:**

Meeting dates for 2019. All meetings held at North Hall Mursell Room

2<sup>nd</sup> December 2019; 6<sup>th</sup> January 2020; 3<sup>rd</sup> February 2020; 2<sup>nd</sup> March 2020.

7.30pm for the planning meeting followed at 8pm by the full Parish Council meeting.

## Appendix 3



### Loxwood Parish Council Neighbourhood Plan Steering Group Parish Questionnaire

*Choice of development sites proposed for Loxwood following a call for sites*

**Deadline for return – 26th June 2020**

Dear Resident,

Loxwood Parish Council needs your help.

The emerging Chichester District Council (CDC) Local Plan Review allocates a further 125 houses for the parish of Loxwood.

We presented CDC's proposals to Residents of the parish at a public meeting in North Hall on the 9 December 2018. At that meeting, which was attended by over 125 people, residents voted unanimously to update the Loxwood Neighbourhood Plan in order to take account of this new allocation whilst, at the same time, vigorously objecting to the number of additional houses. The rationale to this dual approach was to "plan for the worst and hope for the best" and also to ensure that it is you, the residents, who decide where future development in the parish should take place, not the developers. Details of the presentation given at that meeting can be found on the Loxwood Parish Council web site under the Neighbourhood Plan page.

Since that meeting, work has been going on apace to revise the Neighbourhood Plan and to make the case to CDC, at every opportunity, that Loxwood does not need a further 125 houses.

The draft CDC Local Plan Review process has fallen well behind schedule and is now not expected to be completed until well into 2021. The first round of consultations has been completed and we wait to see whether all our objections will have convinced CDC to modify the allocation for Loxwood.

However, on the basis that Loxwood will have to accommodate some, if not all, of the additional housing, the Neighbourhood Plan Steering Group (Steering Group) issued a "Call for Sites" to find out which sites were available for development. Ten sites were put forward by developers or land owners. It is now for the residents of Loxwood to give their views on where the additional housing should be allocated. For reference the 10 sites are shown on the attached maps (*full colour versions of these maps are available on the Parish Council web site under Neighbourhood Plan along with this communication*).

The Steering Group have assessed all the sites using a rigorous site assessment procedure developed by "Locality", a government sponsored non-profit making charitable organisation (*see here for further information - <https://neighbourhoodplanning.org/>*). This process has identified that 8 of the sites are suitable for development. The remaining two sites, Loxwood Farm and Loxwood Garage, are located in the countryside, remote from the settlement boundary of Loxwood village and thus would not be policy compliant for large scale development in the rural countryside.

The eight sites are as follows:

1	Land to the West of Guildford Road	50 Houses
2	Hawthorn Cottage	10 Houses
3	Loxwood House	30 - 40 Houses
4	Land to the rear of Blackhall	26 Houses
5	Woolspinners	5 Houses
6	Land South of Loxwood Farm Place	22 Houses
7	The Wharf	22 Houses
8	Orchard House	10 Houses

All of these sites have been carefully assessed by the Steering Group using the Locality assessment process. Numbers 1 to 5 from the above list have the benefit of concentrating development to the West of the village, adjacent to Nursery Green and would balance the developed area of the village on either side of the B2133.

Ultimately, the location of future development is a decision for residents of the parish and therefore, using this questionnaire, the Steering Group would like you to rank each site in your order of preference, putting 1 to 8 in the boxes on the questionnaire sheet against your preferences.

Should the draft CDC Local Plan be revised during the final consultation and allocates less than 125 houses to Loxwood, then the Steering Group would reflect this in the Revised Neighbourhood Plan taking into account the results of Resident's preferences from this questionnaire.

The results of the questionnaire will be published as soon as possible after the deadline. However, it is possible that events may overtake this process, as developers for two of the above sites have already submitted planning applications. These have both been refused by CDC as being non-compliant with the current Neighbourhood and Chichester Local Plans. However, these decisions can and are being appealed and, if CDC cannot demonstrate a current 5-year housing supply, then the National Planning Policy Framework (NPPF) legislation requires CDC to approve such applications as long as they are considered sustainable. In this event the Steering Group will have their hands tied as to certain choices of sites and will therefore place any sites granted approval in this manner to the top of the preference list. The Steering Group will then allocate additional sites to accommodate the required number of houses from the remaining sites, taking into account the residents' preferences derived from the results of this questionnaire.

Signed: Tony Colling

## Appendix 4

### Preferred Development Sites Questionnaire

Please Print your Name: .....

and Address: .....

*We have only included one questionnaire per household, but recognize that there will be multiple residents at most addresses over the age of 18. If you wish every eligible family member or resident at your address to complete the questionnaire, then please either photocopy this document or download an electronic version from the Loxwood Parish Council web site. You are requested to put the completer's name and address on each additional copy before sending back in the enclosed postage paid envelope. Failure to do so will render that input invalid.*

**Please indicate your choice of sites in order of preference using 1 as being your most preferred choice and 8 being your least preferred choice.**

Land to the West of Guildford Road	<input type="checkbox"/>
Hawthorn Cottage	<input type="checkbox"/>
Loxwood House	<input type="checkbox"/>
Land to the rear of Blackhall	<input type="checkbox"/>
Woolspinners	<input type="checkbox"/>
Land South of Loxwood Farm Place	<input type="checkbox"/>
The Wharf	<input type="checkbox"/>
Orchard House	<input type="checkbox"/>

*How the information you provide will be used –*

#### General Data Protection Regulations

*Any personal information given via this form will be kept strictly confidential only be used to provide a requested service, kept for as long as necessary to provide that service and shared only with the Neighbourhood Plan Steering Group to provide the service. It will not be disclosed to any other third party without your prior permission or unless we are required to do so by law. Personal data will be deleted as soon as possible after the analysis can be completed.*

**Remember** - The deadline for the return of questionnaires is the **26<sup>th</sup> June 2020**. Questionnaires received after this date may not be included in the analysis.

## Appendix 5

June 2020 Site Questionnaire replies for each ranking position											
Loxwood NP Site	No. of proposed houses	1	2	3	4	5	6	7	8	Weighted Score	Weighted Ranking
Land West Of Guildford Road	50	114	25	40	24	48	22	27	73	1832	4
Hawthorn Cottage	10	20	98	59	65	33	30	46	22	1861	3
Loxwood House	35	64	67	76	49	26	46	33	12	2002	2
Land to rear of Blackhall	26	55	73	66	80	44	22	19	14	2041	1
Woolspinners	5	38	28	44	60	103	40	31	29	1687	5
Land South of Loxwood Farm Place	22	35	41	29	39	37	105	60	27	1546	6
The Wharf	22	19	31	24	25	38	34	117	85	1211	8
Orchard House	10	28	10	35	31	44	74	40	111	1248	7

**Methodology of weighted ranking**

Thus for Land West of Guildford Road the weighting score is as follows:-  $(114*8)+(25*7)+(40*6)+(24*5)+(48*4)+(22*3)+(27*2)+(73)=1832$

This method allows individuals's choices to be weighted such that their first choice carries the highest weight, then their second choice and so on to their last choice.

Appendix 6



**LOXWOOD PARISH COUNCIL**

Jane Bromley, Parish Council Clerk, C/O Foxways, Pinkhurst Lane, Slinfold, Horsham, RH13 0QR –  
email [clerk@loxwood-pc.gov.uk](mailto:clerk@loxwood-pc.gov.uk)

***Loxwood Revised Neighbourhood Plan Regulation 14 Comments Sheet***

Please use this comments sheet to make any comments you may have about the Revised Loxwood Neighbourhood Plan. The sheet is separated into the various policies contained in the plan to make it easier to complete. A summary of all comments, not personal data, will be publicly available. Please note that any personal information provided will be confidential and processed in line with the General Data Protection Regulations 2018. The Parish Council will process your details in relation to the preparation of a comments summary only.

Please confirm below that you are happy for the Parish Council to pass on your contact details (*name, address, email*) onto Chichester District Council (CDC) so that they can contact you at Regulation 16 stage consultation.

**Finally, please email the completed comment sheet to the parish clerk by 5pm on 9<sup>th</sup> November 2020.**

<i>Name</i>	<i>Address including post code</i>		<i>Confirmation to allow personal data to be passed to CDC –</i>
			YES <input type="checkbox"/> NO <input type="checkbox"/>
<i>Email address</i>			
<i>General Support</i>	<i>I have NO comments but SUPPORT the Revised Loxwood Neighbourhood Plan</i>	<i>I have NO comments but DO NOT SUPPORT the Revised Loxwood Neighbourhood Plan</i>	
Please tick the appropriate box	<input type="checkbox"/>	<input type="checkbox"/>	
<i>General Support</i>	<i>I have comments and SUPPORT the Revised Loxwood Neighbourhood Plan – see comments below</i>	<i>I have comments but DO NOT SUPPORT the Revised Loxwood Neighbourhood Plan – see comments below</i>	

Please tick the appropriate box	<input data-bbox="676 203 730 253" type="checkbox"/>	<input data-bbox="1107 203 1161 253" type="checkbox"/>
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<b>POLICIES</b>		
<b>Policy Number</b>	<b>Sub-section</b>	<b>Your Comments</b> <i>(Please use a continuation sheet as required)</i>
<b>16.1. Housing Allocation Policy</b>		
<b>16.2. Settlement Boundary Policy</b>		
<b>16.3. Site Assessments &amp; Allocation of Sites Policy</b>		
<b>16.4. Land at Farm Close</b>		
<b>16.5. Commercial Land at Nursery Green</b>		
<b>16.6. Land West of Guildford Road</b>		
<b>16.7. Land South of Loxwood Farm Place</b>		

<b>POLICIES</b>		
<b>Policy Number</b>	<b>Sub-section</b>	<b>Your Comments</b> <i>(Please use a continuation sheet as required)</i>
<b>16.8. Land to the Rear of Black Hall</b>		
<b>16.9. Loxwood House</b>		
<b>16.10. Local Green Spaces policy</b>		
<b>16.11. Street Lighting Policy</b>		
<b>16.12. Waste Water and Surface Water Policy</b>		
<b>16.13. Built Environment – Housing Density Policy</b>		
<b>16.14. Built Environment – Vernacular Policy</b>		

<b>POLICIES</b>		
<b>Policy Number</b>	<b>Sub-section</b>	<b>Your Comments</b> <i>(Please use a continuation sheet as required)</i>
<b>16.15. Wey &amp; Arun Canal Policy</b>		
<b>16.16. Rural Area Policy</b>		
<b>16.17. Housing Extension – Style and Vernacular Policy</b>		
<b>16.18. Economy and Business Policy</b>		
<b>16.19. High Speed Broadband Policy</b>		
<b>16.20. Traffic Calming &amp; Speed through the Village Policy</b>		
<b>16.21. Environmental Characteristics Policy</b>		

Appendix 7



# **LOXWOOD REVISED NEIGHBOURHOOD PLAN**

## **Parish Consultation**

**The Revised Neighbourhood Plan local consultation will take place  
between the 28th September and 9th November 2020**

**It is very important that Loxwood residents have a say in what happens  
to our village and the Revised Neighbourhood Plan gives us all an  
opportunity to do this. The Plan defines where all the new houses will  
be built over the next 15 years as well as policies on housing, vernacular,  
traffic calming, flooding and many others.**

**The Revised Neighbourhood Plan can be viewed and downloaded from  
the village web site <https://www.loxwood-pc.gov.uk> under the  
Neighbourhood Plan tab. A comment form can also be downloaded  
from the web site**

**Completed forms should be e-mailed to [clerk@loxwood-pc.gov.uk](mailto:clerk@loxwood-pc.gov.uk)**

**Paper Copies of the Revised Neighbourhood Plan are also available at  
the Post Office, Butchers, Onslow Arms and the Sir Roger Tichbourne  
pub together with the comment form and return envelope.**

## Appendix 8

## Regulation 14 - Statutory Consultees

Consultee	Comments Received Yes/No	Response
BT -don.cd.lynn@openreach.co.uk	NO	
CAA aerodromes@caa.co.uk	NO	
thecoalauthority@coal.gov.uk	NO	
planningssd@environment-agency.gov.uk	NO	
david.bowie@highwaysengland.co.uk	YES	<b>See comments table</b>
planningse@highwaysengland.co.uk		
e-seast@historicengland.org.uk	YES	See comments table
home and communities agency <a href="mailto:paul.shorten@hca.gsx.gov.uk">paul.shorten@hca.gsx.gov.uk</a>	NO	
<a href="http://HomesEnglandenquiries@homesengland.gov.uk">Homes England enquiries@homesengland.gov.uk</a>	NO	
<a href="mailto:HDC_mark.mclaughlin@horsham.gov.uk">HDC mark.mclaughlin@horsham.gov.uk</a>	NO	
<a href="mailto:LocalEnterprisePartnershipcontact@coast2capital.org.uk">Local Enterprise partnership contact@coast2capital.org.uk</a>	NO	
consultations@naturalengland.org.uk		
townplanningse@networkrail.co.uk	NO	
Office of rail regulation contact.cct@orr.gsi.gov.uk	NO	
Planning Inspectorate <a href="mailto:Plans.Admin@planninginspectorate.gov.uk">Plans.Admin@planninginspectorate.gov.uk</a>	NO	
Thames Water Consultant drwilson@savills.com	NO	
lucy.howard@southdowns.gov.uk	NO	
enquiries@secamb.nhs.uk	NO	

wre@southeastwater.co.uk	NO	
john.smart@sse.com	NO	
sab@southernrailway.com	NO	
planning.policy@southernwater.co.uk	Yes	See comments table
planning.southeast@sportengland.org	Yes	See comments table
south.enquiries@stagecoachbus.com	NO	
planning.consultations@surreycc.gov.uk	Yes	No comment to make
planning@sussex.pnn.police.uk	NO	
Sussex Local Nature Partnership <a href="mailto:kate.cole@eastsussex.gov.uk">kate.cole@eastsussex.gov.uk</a>	NO	
thameswaterplanningpolicy@savills.com	NO	
planningpolicy@waverley.gov.uk	Yes	See comments table
planning.policy@westsussex.gov.uk	YES	See Comments Table
communications@wsht.nhs.uk	NO	
vdobson@chichester.gov.uk	Yes	See comments table
<a href="mailto:neighbourhoodplanning@chichester.gov.uk">neighbourhoodplanning@chichester.gov.uk</a>	NO	
<u>Developers land owners:</u>		
Ed Rees Woolspinners <a href="mailto:ed@domusea.com">ed@domusea.com</a>	NO	
M Stephens Castle Properties <a href="mailto:ms@castle-land.co.uk">ms@castle-land.co.uk</a>	NO	
Land South Loxwood Farm Place david.neame@neamesutton.co.uk	NO	
<a href="mailto:lbargman@residedevelopments.co.uk">lbargman@residedevelopments.co.uk</a>	NO	
Antler Homes <a href="mailto:andrew.farquhar@antlerhomes.co.uk">andrew.farquhar@antlerhomes.co.uk</a>	YES	See Comments Table.
The Wharf alison.guyton@henryadams.co.uk	NO	
The Wharf <a href="mailto:paul@ss-p.co.uk">paul@ss-p.co.uk</a>	YES	See Comments table
Brewhurst Lane damianr@paragraph.co.uk	NO	

Loxwood Garage <a href="mailto:sevenhills@btinternet.com">sevenhills@btinternet.com</a>	NO	
<a href="mailto:kelly@sensusarchitecture.co.uk">kelly@sensusarchitecture.co.uk</a>	NO	
judith.onuh@thakeham.com	NO	
jamie@fowleronline.co.uk	NO	
gfseymour@hotmail.co.uk	NO	
Dan Weatherell <a href="mailto:dan@etplanning.co.uk">dan@etplanning.co.uk</a> for Mr Smith	YES	See comments table
<a href="mailto:environmentalwm@aol.com">environmentalwm@aol.com</a>	YES	See comments table
<b>Regulation 13</b>		
<a href="mailto:planningssd@environment-agency.gov.uk">planningssd@environment-agency.gov.uk</a>	NO	
consultations@naturalengland.org.uk	NO	
<b>Parish Councils Regulation 14</b>		
clerk@alfoldparishcouncil.co.uk	NO	
clerk@kirdford-pc.gov.uk	NO	
clerk@wisboroughgreenpc.org	NO	
clerk@plaiستowandifold.org.uk	NO	
clerk@billingshurst.gov.uk	Yes	No comment
clerk@rudgwickpc.co.uk	Yes	See Comments table
<b>SEA</b>		
Historic England	YES	See comments table
CDC	YES	<b>See comments table</b>

**Appendix 9 – Regulation 14 Consultation Responses / Actions**

<b>REVISED Loxwood NP Regulations 14 Comments</b>			
<i>Policy Number</i>	<i>Consultee/ Resident Number</i>	<i>Comments</i>	<i>Response</i>
<b>16.22. Housing Allocation Policy</b>	3	The allocation to Loxwood is disproportionate	<b>Noted</b> – LPC has no control over the allocation by CDC
	5	Chichester are so far from the village that they do not seem to understand that this village cannot be swamped by so many houses.	<b>Noted</b> – see above
	7	In my view, Loxwood PC has done a great job with the original Neighbourhood Plan; this updated plan is very well thought out and hopefully will be supported by residents. I am however concerned that Chichester DC seems to ignore the plan and continue to allocate housing to our village far in excess of the agreed numbers. I get the feeling that as the most distant parish from Chichester, it is the one that is the easiest to develop. I am also concerned that the Planners do not seem to support our plan and continue to pander to developers, providing little opposition to the march of building in our area.	<b>Noted</b> – see above
	9	We believe the total allocation of houses is grossly unfair on this parish.	<b>Noted</b> – see above
	10	Housing expansion is inevitable LPC need to ensure in Loxwood It is kept to a minimum. Can you comment on CDC s expectation of an additional 1000 houses in Loxwood over 10-20 years.	<b>Noted</b> – the inclusion of this tranche of land in the 2020 CDC HELAA does not mean that the site will be allocated by CDC as a Strategic Site. It simply means that a landowner has submitted this site for inclusion in the HELAA and CDC has assessed it as being potentially developable in the future.
	11	The number of houses seems excessive for our small, semi-rural village but I do accept that local youngsters need affordable housing to enable them to stay local and our older residents need housing options to permit them to downsize locally.	<b>Noted</b> – See comments on housing numbers above.
	Antler Homes	We support this policy and the allocation of new residential development within the village.	<b>Noted</b>
	Rudgwick PC	Rudgwick Parish Council notes the concern regarding the number of houses to be developed	<b>Noted</b>
	13	The revised 2019 - 2035 allocation is appropriate – just.	<b>Noted</b>
	15	Under Policy 1 it is proposed that up to 8 flats could be built above the proposed shop. Given that the shop size is proposed at 235 sq metres, 8 flats could only be built above by	<b>Disagree</b> – The Commercial site already has an approved planning application for a retail unit

		<p>building on 2 floors over the shop and resulting in a 3 storey building with a flat roof. This should not be allowed as it is contrary to Policy 14 in terms of buildings not exceeding 2 storeys, excessive bulk and ‘All new developments should continue to reflect the character and historic context of existing developments’.</p> <p>The number of flats needs to be restricted to a maximum of 4 above the shop.</p>	<p>with 10 flats above over 2 1/2 stories the height of which does not exceed 9.5m which is the height of many houses on Nursery Green. The current planning application for this site does not included a three story retail unit. Therefore, it does not conflict with the proposed policy n dwelling height which state a maximum of 2 storeys where possible. The objective of this policy is to ensure that the height of new dwellings do not exceed those of the surrounding properties.</p>
	17	<p>I’m a little concerned that recently a builder sent through a proposal for 21 dwellings at the back of Hollyview House, which is not included in this proposal. If we sum up all of the other proposed sites and add the 21 above, we get to 164, which is way in excess of what the plan proposes.</p>	<p><b>Noted</b> – We believe you are referring to Hawthorn Cottage not Hollyview house. Initially this landowner put forward their land under the call for sites for a development of up to 10 dwellings. Their intentions have subsequently changed and any proposed application for a higher number of dwellings will be assessed in accordance with this revised NP.</p>
	Seaward Properties Ltd	<p>See Seaward Properties comments in their submission response below within “Other Comments” Section</p>	<p><b>Noted</b> – The response Seaward Properties comments is contained in appendix 1 of this document</p>
	Dan Weatherell ET Planning- (The Old School)	<p>We do not consider that the draft Neighbourhood Plan (‘NP’) in its current form meets the basic conditions of paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990. We consider that the draft NP requires a more ambitious housing requirement to ensure that the Plan meets the following basic conditions: Paragraph 8 (2) (d) - The making of the neighbourhood plan contributes to the achievement of sustainable development Paragraph 8 (2) (e) - The making of the neighbouring plans in general conformity with the strategic policies contained in the development plan for the area Background By way of background, we note that Chichester District is in the process of progressing an emerging Local Plan 2035. This is at a relatively early stage in the process, with the Preferred Approach version of the Chichester Local Plan Review published for consultation from 13 December 2018 to 7 February 2019. The Councils timeline (published on their website) sets out the following future stages of the emerging Local Plan process: • Stage 4 – Further evidence • Stage 5 – Considering options • Stage 6 – Testing strategy • Stage 7 – Publishing</p>	<p><b>Noted</b> –</p> <ol style="list-style-type: none"> <li>1. This site was not put forward as part of the Call for Sites and as such was not considered.</li> <li>2. The site is not listed in the 2020 CDC HELAA nor any previous versions</li> <li>3. It is a small site consisting of one dwelling and would normally come forward as windfall development</li> <li>4. It is outside the current and proposed Village settlement boundary and thus is classified as in the rural area.</li> </ol>

	<p>the Plan • Stage 8 – Submitting the Plan Regarding housing need, the following is noted with respect to Chichester District: • Current Local Plan housing requirement of 435dpa • Current Standard Method figure of 753dpa • Proposed Standard Method figure of 1,120dpa The Preferred Approach version of the Chichester Local Plan Review states at paragraph 4.22 that: “This Plan seeks to make provision for an additional 12,350 dwellings to be delivered during the period 2016-2035 in accordance with the findings of the Chichester Housing and Economic Development Needs Assessment (HEDNA). This reflects the identified objectively assessed housing needs of the plan area, plus an allowance for accommodating unmet need arising from the Chichester District part of the South Downs National Park.” Based on the above, Draft Policy S4 sets out a proposed Local Plan housing requirement of 650dpa. Draft Policy S5 then provides parish level housing requirements so that suitable sites can be identified either through neighbourhood plans or subsequent development plan documents. 2 Based on an emerging Local Plan housing requirement of 650dpa (Draft Policy S4), Loxwood Parish has a housing requirement of 125 dwellings (Draft Policy S5). We note that Loxwood PC are seeking to review their 2015 Neighbourhood Plan, in part to respond to this increased housing requirement. - The 2015 Made Neighbourhood Plan had a minimum housing target of 60 dwellings - The Draft Neighbourhood Plan (which is the subject of this consultation) increases this minimum housing target to 126 dwellings Whilst we support the Draft NP’s increase in the housing requirement, we feel that the Draft NP should be going further in terms of its housing requirement. This is because the proposed standard method figure for Chichester District (1,120dpa) represents a large increase in the level of housing need currently being planned for in the emerging Local Plan (650dpa). Should the government implement the proposed standard method figure for Chichester District (without amendments), it is noted that the emerging Local Plan has several stages to go through before being submitted to the Secretary of State. Whilst the transitional arrangements have not been made clear in the recent MHCLG consultation, the draft Local Plan is unlikely to be able to circumvent this higher Government imposed figure (as it relatively early in the plan making process). Recommendations One of the basic conditions for a neighbourhood plan is paragraph 8 (2) (e), which states that the making of a neighbourhood plan “should be in general conformity with the strategic policies contained in the development plan for the area”. As currently drafted the neighbourhood plan has insufficient flexibility to respond to the (high) likelihood that the housing requirement in the emerging Local Plan will need to increase. It should therefore be expected that the corresponding requirement for Loxwood should also need to increase, given its recognised ability to accommodate growth. The requirement for Loxwood would need to proportionally increase with any district-wide</p>	<ol style="list-style-type: none"> <li>5. The site is the subject of a prior notification planning application to extend the existing property</li> <li>6. Sites of one dwelling would not normally be considered as an allocated development site within a NP.</li> <li>7. With regard to comments on the housing target for the parish, the Neighbourhood Plan is planning positively to meet the current housing target set in the Preferred Approach Local Plan. If this figure were to change, the NP will respond accordingly.</li> </ol>
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		<p>increases. Whilst the NP policy requirement is expressed as a minimum, in reality there will only be a requirement to meet this minimum. In this way, the Draft NP is not positively prepared in respect of the NPPF's requirement to boosting the supply of housing. It should also be noted Chichester's HLS statement dated July 2020 states that the Council can only demonstrate 4.3 years housing land supply. A requirement which is expressed as a minimum seems inadequate in this context. Therefore the draft NP requires a more ambitious housing requirement to ensure that the Plan meets the basic conditions of paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990, as outlined above. Our client has a site within the Neighbourhood Plan Designated Area. The Site is The Old School on the B2133, adjacent to the settlement and an appropriate location for future growth. We feel that this site would contribute towards 2 meeting this additional housing need, and we would welcome further discussion with the Parish Council regarding the merits of the site or any points raised within this response.</p>	
	18	<p>We have experienced first hand the issues with the failing sewage infrastructure. Our driveway was flooded for a period of over 12 hours with sewage in Aug 20 – and as a result our dog passed away 3 days later. This devastating occurrence would become more frequent for us as it would many others along the Guildford Road if any houses are to be connected to the current system. Our understanding is Southern Water are under no legal obligation to uphold their statement of upgrading the system – however they are legally obliged to connect any new houses whether the infrastructure can cope or not. Until the sewage infrastructure is upgraded we cannot support the neighbourhood plan and the proposed sites for new developments.</p>	<p><b>Noted</b> – The Revised NP seeks to address these concerns whilst noting that connection to sewage infrastructure is not a planning consideration</p>
	CDC	<p>Para 16.1.1 and 16.1.2 – text needs some amendments to reflect correct plan period and to make reference to the Preferred Approach version of the LPR.</p> <p>In relation to Policy 1 and Policy 2 there is concern over the amendment to the settlement policy boundary to include as yet unknown areas of built form of proposed allocations. Suggest following a similar approach to CDC in relation to sites; the allocation remains outside the SPB until the construction of the built form and then the SPB can be amended at a later stage more accurately. Site allocations would be shown on a simple site boundary map in relation to the relevant policy and then in context outside the SPB on a larger policies map.</p>	<p><b>Disagree</b> – Changed to 2037 to align with CDC Local Plan</p> <p><b>Disagree</b> – The Settlement Boundary in the current plan was drawn to encompass the allocated sites. This is the general approach taken with all Neighbourhood plans. Consequently in this revised NP the SB has been drawn to encompass the newly allocated sites and any potential windfall sites. Built form may not be represented by the site's boundary.</p>

		<p>It would be clearer if the policy referred to the requirement for a minimum of 125 new houses as this is the figure currently proposed in the preferred approach version of the LPR. This figure is yet to be confirmed by the LPR and may be subject to change either in the submission version of the LPR or by the Inspector during any subsequent examination of the LPR. The PC need to therefore be aware of this in moving forward with their draft NP. The reference to the previously allocated 17 (Farm Close) and 8 flats on the commercial site again brought forward from the previous NP would then be included as policies as before from the previous NP. The supporting text could draw these elements together to provide a comprehensive picture of the overall approach being taken in the plan and reference could then be made to each policy component.</p> <p>Reference should be made to dwellings rather than houses and figures should be expressed as minimum</p>	<p><b>Disagree</b> – The NP allocates 126 dwellings (one more than the 125 indicative number in the LPR preferred Approach document). In addition we have carried forward 17 dwellings from the current NP. The 8 flats on the commercial site were not allocated in the previous NP. They form part of a current planning application on the combined Black Hall and Commercial sites and are included in our new allocation. Policy 1 has been corrected to reflect the inclusion of these 8 Flats/apartments. Policy 5 has been amended to reflect the inclusion of these 8 flats/apartments as part of the overall numbers.</p> <p>Agree – Allocations for all sites changed to minimum. All references to houses have been changed to dwellings</p>
<b>16.23. Settlement Boundary Policy</b>	5	I accept the change	<b>Noted</b>
	10	In view of the 1000 above how will this effect this policy	<b>Noted</b> – the inclusion of this tranche of land in the 2020 CDC HELAA does not mean that the site will be allocated by CDC as a Strategic Site. It simply means that a landowner has submitted this site for inclusion in the HELAA and CDC has assessed it as being potentially developable in the future.
	11	A shame this has increased but I fell this has been considered very sensibly and cleverly to minimise impact on the appearance of the village.	<b>Noted</b>
	Antler Homes	<b>16.2.3 Restricting windfall development to a maximum of 6 is not supported. Each windfall scheme should be assessed on its own merits. It may be at the advantage of the Parish Council to accept a larger windfall site if, for example, smaller units were proposed</b>	<b>Disagree</b> – CDC in their Revised Local Plan para 4.29 defines developments of up to 6 dwellings as being covered by their allocation for windfall. This requirement was spelt out in the current CDC Local Plan housing allocation

			numbers for the North of Plan area. A total of 139 dwellings were allocated to all the parishes within the North of Plan area.
	13	Acceptable, bearing in mind that Site 1 was outside the settlement boundary when the planning application was made and has been 'reluctantly' agreed because of appeal costs. This should not become the precedent. The new settlement boundary is absolutely pushing at the limits of what constitutes the identity and extent of Loxwood within its rural environment.	<b>Noted</b>
	17	Anything outside the Settlement Boundary is rural until the next time the boundary is revised. It calls into the question the point of having a boundary in the first place if it can just be moved. If the district council just approves planning applications outside of the boundary and we continue to include these within the boundary, where will it stop?	<b>Noted</b> – For simplicity and to minimise the future number of changes to the NP, it has been decided to amend the settlement boundary to incorporate newly allocated sites when allocated sites are brought forward.
	Historic England	Historic England does not object to the revised settlement boundary. We recognise that the boundary has been extended to include only the necessary sites allocated within the Plan and consider the new settlement boundary to be in keeping with the character and layout of the current village. The medieval moated site near Loxwood Farm Place is clearly noted on the map showing the revised settlement boundary, but is not referenced anywhere in the Plan text. In conjunction with our earlier recommendations regarding Loxwood Farm Place, we would advise that the Plan notes an awareness of this non-designated heritage asset and the impact that the revised settlement boundary could have upon it.	<b>Partially Agree.</b> - Reference to the Moat will be referenced para. 8 Heritage Assets and in appendix 2 of the NP
	CDC	Comments as above in relation to Policy 1 relating to concern over amendments to SPB. A more appropriate approach is to identify the allocations in their own right outside the SPB and allow them to come forward prior to any amendment the SPB.	<b>Disagree</b> – See comments relating to the settlement boundary above
<b>16.24. Site Assessments &amp; Allocation</b>	1	Potential problem exists for: Flood risk; waste water; and primary education and apply to policies 16.1 – 16.9, 16.12 and 16.15. They require urgent attention.	<b>Noted</b> – It is unclear what the Consultee is addressing with respect to the policies referred to
	5	I feel the land south of Loxwood Place Farm is totally unsuitable with the exit on the narrow bendy part of the B2133. Accident waiting to happen.	<b>Noted</b> – This aspect of access was raised at the planning Committee hearings. However, the

<b>of Sites Policy</b>			committee's decision was to approve this Outline planning application with access.
	9	It appears to be a free for all, encouraged by Conservative government polices!	<b>Noted</b>
	10	Difficult task well done	<b>Noted</b>
	11	As above.	<b>Noted</b>
	13	<p>Acceptable. Deeply regretful to see historic pastureland built over and worrying that landowners seem to view this as the way to a quick profit.</p> <p>It is crucial that development of land that borders heritage and recreational areas is opposed, as is the development of flood plain areas.</p>	<b>Noted</b>
	Antler Homes	<p>We support and reiterate the conclusions that the Land at Blackhall is the preferred development site within the village. The site can immediately come forward for a total of 19 houses and 8 flats, as demonstrated by the current planning application 20/02582/FUL. We therefore request the Neighbourhood Plan steering group to consider increasing the number from 14 to 19 houses in addition to the 8 flats on the Nursery Green site within the allocation. Please see plan submitted with this representation for further information.</p>	<p><b>Disagree</b> – The 14 dwellings allocated on the Land to the Rear of Black Hall is commensurate with the housing density policy. This stipulates an approximate density of 18 dwellings per hectare increasing the allocation to 19 dwellings would create an overcrowded site which would not fit the vernacular of the surrounding area.</p> <p>All allocated site allocations have been amended to reflect a minimum allocation.</p>
	15	<p>In the questionnaire on site allocation in which the 'Land to the rear of Blackhall' site was supported as first choice by Loxwood residents, the number of houses proposed was 26. Antler Homes currently propose 19 houses on the site - a significantly lower density than supported by the Loxwood residents.</p> <p>This needs to be taken into account in assessing the housing density on this site.</p>	<b>Disagree</b> – See above comments
	17	See comment against 16.1	<b>Noted</b> – The comments at 16.1 apply
	Seaward Properties Ltd	<p>We object to the failure of the plan to meet the basic conditions for plan preparation and request additional housing allocations are made in the next Submission Neighbourhood Plan including Land at the Wharf Loxwood for at least 22 dwellings and retained land for a wildlife corridor.</p>	<b>Disagree</b> – The response to these comments is contained in appendix1 of this document
	Highways England	<p>Thank you for your notification dated 28 September 2020, inviting Highways England to comment on the Revised Loxwood Parish Neighbourhood Plan REGULATION 14 Consultation, seeking responses no later than 9 November 2020.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway</p>	<b>Noted</b>

		<p>authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>Highways England will be concerned with plans and/or proposals that have the potential to impact on the safe and efficient operation of the SRN. Given the location of Loxwood Parish, in this case our focus will be on any potential impact to the A3 and A23/M23 corridor, both of which are considerable distance from the Parish.</p> <p>We note that the Revised Neighbourhood Plan relies on the Chichester District Council Local Plan (2016-2035) regarding the general quantum of housing for the Parish. The Parish was allocated 125 dwellings for the plan period.</p> <p>Highways England understand that there were a number of sites considered during the allocation process, with four sites identified in the Neighbourhood Plan to support development. These sites include:</p> <ol style="list-style-type: none"> <li>1. Land West of Guildford Road – 50 houses (granted planning consent Aug/Sept 2020)</li> <li>2. Land South of Loxwood Farm Place – 24 houses (granted planning consent Aug/Sept 2020)</li> <li>3. Loxwood House – 30 houses</li> <li>4. Land to the rear of Black Hall – 14 houses (plus 8 flat/apartments).</li> </ol> <p>Following our assessment of the Revised Neighbourhood Plan and the allocated sites listed above, it was concluded that the delivery of housing development across the Parish will not significantly impact the safety or operation of the Strategic Road Network at either the A23/M23 corridor or the A3.</p>	
	<p>Waverley Borough Council</p>	<p>Thank you for consulting Waverley Borough Council with regards your revised neighbourhood plan.</p> <p>The only comment we wish to make at this point concerns the allocation of housing within your parish. Whilst we welcome the fact that you are able to allocate all your housing need within your parish, we would like to raise a concern regarding its siting.</p> <p>The five sites are predominately along the B2133, which leads into Alfold and subsequently the A281 to the north. There is significant development planned in these</p>	<p><b>Noted</b> – Waverley Borough Council have allocated well over 3000 new dwellings in their Local Plan, all of which will feed onto the A281. In our view, a further 126 houses in Loxwood will not significantly change or impact the outcome of the traffic on the A281 and</p>

		<p>areas so this additional development may impact on the capacity of the roads in the future.</p> <p>Christine Goudie Planning Officer (Policy)</p>	<p>consideration to the impact on the highway network can be further considered through the planning application process for individual sites.</p>
	CDC	<p><b>Rather than listing individual policies suggest this would be better phrased to state that provision will be in accordance with policies in the development plan. This would then include LP, LPR and NP policies as relevant.</b></p> <p><b>Para 16.3.5 - reference should be made to “dwellings” rather than houses to allow flexibility for flats or bungalows.</b></p>	<p><b>Disagree</b> – it is preferred that the NP remains self contained with regard to its own policies. Compliance with CDC LP and LPR is a given. Stating individual policies gives guidance on which policies should apply with respect to planning applications relating to allocated and windfall sites.</p> <p><b>Agree</b> – Amendments made as necessary</p>
<b>16.25. Land at Farm Close</b>	5	<p><b>Very suitable in the hands of the right developers.</b></p>	<p><b>Noted</b></p>
	Southern Water	<p><b>Southern Water’s assessment of this site has revealed underground infrastructure and existing easements that will need to be taken into account when designing site layout. A policy criterion should be added to Policy 4 that states ‘Layout of this site will need to be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes’</b></p>	<p><b>Agreed.</b> The policy has been amended to reflect Southern Water’s comment. The current suggested layout of the site takes into account the large underground surface water tank that exists in the northern part of the site. The narrative and policy for the site will be amended to reflect the constraint that the underground tank causes when designing the site.</p>
	13	<p><b>As this will happen, let’s see a plan in sympathy with the local vernacular and avoids cramming more than the agreed housing number onto the site. The last planning application was terrible.</b></p>	<p><b>Agreed</b> – Any subsequent planning application will be assessed against the relevant policies on the Revised NP and will seek to ensure that the layout and style of any new development fits the vernacular of the parish.</p>
	17	<p><b>Given its location close to the surgery, it would be ideal for smaller houses to be prioritised to elderly people who would like to downsize or maybe akin to Elmbridge Village near Cranleigh.</b></p>	<p><b>Noted</b> – Any dwellings allocated on this site will be subject to the affordable housing policy of the CDC Local Plan which requires the mix of housing to accommodate the perceived</p>

			housing needs across the District. This includes consideration of properties from 1 to 4 bedrooms and bungalows.
	WSCC	<p><b>Appendix 1 does not show where Land at Farm Close is located and Appendix 2 does not contain a suggested site layout – this needs checking.</b></p> <p><b>It is noted that 8 x additional car parking spaces for the doctor’s surgery are required though it is not clear how this number has been arrived at.</b></p> <p><b>It is also noted that ‘contribution toward village traffic calming’ is required. The LHA consider that whether development would be required to contribute toward traffic calming would be assessed depending on the scale and context of development. Nevertheless, noted that Policy 20 requires all allocated sites to contribute toward traffic calming.</b></p>	<p><b>Agreed</b> – the Appendix 1 has been updated to include all allocated sites</p> <p><b>Noted</b> – The additional car parking spaces were agreed with the Doctor’s Surgery and the developer at the time. Currently a significant number of patient’s park in Farm Close which causes traffic congestion. The additional spaces will help to alleviate this problem.</p> <p><b>Noted</b></p>
	Historic England	<p><b>Historic England does not object to the allocation of this site for development. We advise that there be a requirement within the policy that archaeological investigation of the site is carried out in advance of any development commencing. As with the Land South of Loxwood Farm Place, this should initially take the form of a written scheme of archaeological investigation and trial trenching, with a subsequent full investigation to follow if necessary.</b></p> <p><b>Historic England also recommends an amendment to the policy to specify that any development within the site boundary be limited to a maximum of two storeys and should conform to existing guidance on conserving the vernacular character of the village.</b></p>	<p><b>Disagree</b> - There is no evidence to suggest that there is any evidence of archaeological features historic or otherwise within the site. As part of an earlier planning application, the site has had all the top soil removed and built up in mounds.</p> <p><b>Disagree</b> - Other policies within the NP address the height of buildings and their vernacular.</p>
	CDC	<p><b>The references to Appendix 1 and 2 (which relates to Buildings, Settings and Spaces) do not seem to contain the site information indicated; this is currently after the policy. In itself this would not be inappropriate; however, the layout is from an expired planning permission and should therefore be removed as it would overly restrict any forthcoming proposals. A clear site allocation map should be provided to show the relevant outline of the site.</b></p>	<p><b>Agree</b> – Appendix 1 will be updated to include maps of allocated sites and all sites under consideration within the NP. Reference to Appendix 2 removed and references made to Figure 7. Figure 7 will be retained as an indicative layout suggestion only and seeks to constrain the development</p>
	1	<p><b>Relocation of the current general shop and post office in the village is vital.</b></p>	<p><b>Agree</b></p>

<b>16.26. Commercial Land at Nursery Green</b>	3	16.5.2.... but due to the developers reserving by covenant the site for the mini supermarket as access to the land to the rear of Blackhall the mini supermarket promised was not built.	<b>Disagree</b> – The current wording in 16.5.2 accurately reflects the position from a planning perspective which is all the Revised NP is required to do.
	5	Really needed and the opinions of the new people in Loxwood Green all knew there would be a shop no moaning from them should be held to account.	<b>Noted</b>
	6	Definitely need a shop in this vicinity	<b>Noted</b>
	10	The Marda plan approved and promoted by LPC was a higher density than the new Antler Plan. Why do LPC complain about this Lower density.	<b>Noted</b> – The Marda Plan did not include the Land the Rear of Black Hall. The Marda approved planning consent allocated 10 flats/ apartments. The Revised NP policy 5 c) allocated an unspecified number of Flats above the retail development. The post Regulation 14 version of the revised NP policy 5 c) has now been amended to correctly allocate up to 8 flats/apartments above the retail development. There is no concern over the density of the Commercial site on Nursery Green.
	Antler Homes	The land at Black Hall is discussed in detail in the section below. Both sites are being promoted through the planning system together by Antler Homes. As is evident from the planning application, the parking for the shop is proposed on part of the Blackhall site and a residential building on the corner of Nursery Green. We request that polices 16.5 and 16.8 are merged together into a single allocation as this is how they are being bought forward for development. The advantages of this are that the car parking can be located on the Blackhall section of the site, a better layout can be achieved and access into the Blackhall site for residential development can come through Nursery Green, which is preferable in highway terms. The allocation should match the latest proposed plan, which is a well-considered proposal taking into account all the material considerations raised by the Parish Council and Chichester District Council	<b>Disagree</b> - The commercial site was part of the Nursery Green development in the current Made NP policy 5. The site still has a current planning consent for a retail development on the site (19/01498/FUL). Land to the rear of Blackhall is a separate parcel of land which came forward as part of the call for sites for the revised NP. Accordingly, both sites have been kept separate in order to provide continuity with the original NP and to protect against either: - 1). the current planning application by Antler Homes not gaining planning consent and 2). to safeguard against the permission not being built out if the current Antler Homes application does gain consent.

			It is considered that the retail development parking would be better suited and safer if it is located adjacent to the retail outlet.
	13	<b>Please get on with this. We need the shop if the village is to grow and thrive as intended.</b>	<b>Noted</b>
	15	<p><b>Parking for shoppers certainly needs to be provided on site, however, it is inevitable that shoppers will park in the visitor parking spaces opposite the proposed shop. The lay-by on the same side of the road as the shop was originally intended as the loading bay for the shop rather than as visitor parking but under the Antler proposal for the site a loading bay is proposed within the site and this space should be viewed as part of provision for shoppers.</b></p> <p><b>Given that the shop size is proposed at 235 sq metres, 8 flats could only be built above by building on 2 floors over the shop and resulting in a 3 storey building with a flat roof. This should not be allowed as it is contrary to Policy 14 in terms of buildings not exceeding 2 storeys, excessive bulk and 'All new developments should continue to reflect the character and historic context of existing developments'.</b></p> <p><b>The number of flats needs to be restricted to a maximum of 4 above the shop.</b></p>	<p><b>Agree</b> - See above response. In addition the layby opposite the proposed shop was allocated as visitor parking for the Nursery Green development and must be kept for this purpose. The Revised NP policy requires that all parking for the shop be retained within the commercial site. Policy 5 (b) of the revised NP reflects this requirement.</p> <p><b>Disagree</b> - With careful design the height of the shop with 8 flats/apartments above can be kept to 2 stories with dormer windows in the roof space. The Marda proposal detailed above had 10 flats above the shop in the roof space and the height of the building was 9.3 metres and as such was no higher than other houses on Nursery Green. Any planning application would be subject to the built environment policy</p>
	16	<b>Attempting to build a shop with 8 flats above it on two floors with a roof height not exceeding 9.5 metres can only be achieved with a flat roof. This is not in keeping with the local style or attractiveness of the village buildings. The mass of the building would be excessive.</b>	<b>Disagree</b> - See above comments
	17	<b>I would prefer to wait until the end of 2021 when the restrictive covenants fall away to build anything on the site and then go back to the Co-op application. We need a shop that is appropriate for a village the size Loxwood is going to be, not a village shop with overpriced products. The Co-op has very sustainable and environmentally friend policies that we should buy into.</b>	<b>Noted</b> - Marda, the company which had the agreement with the CO-OP and who gained planning consent for the shop (19/01498/FUL), have sold the land to Antler Homes, It is unlikely that this option would be taken up by Antler Homes. Land use planning policies can influence the 'use' of the land but not the occupier of a commercial unit
	Historic England	<b>Historic England does not object to the allocation of this site for commercial development. We do, however, have concerns about the height of the proposed development and the</b>	<b>Noted</b> - The site is currently the subject of a planning application which LPC have

		<p>impact that this may have on the locally listed Black Hall, which is in close proximity to the site. The proposed development consists of a medium sized convenience store with eight flats above, spread over an additional two storeys. Although the policy states that the height of the development should not exceed 9.5 metres, Historic England feels that such a development would look out of character with its surroundings. At a minimum, any development on this site should be designed so as not to overlook Black Hall. Historic England recommends that you consider alternative ways in which to accommodate the allocated level of housing within the site, or where appropriate, within neighbouring sites.</p>	<p>commented upon. The layout diagram figure 11 will be replaced with a more up to date layout.</p> <p>A previous planning application for a slightly larger commercial building was granted planning consent with a height slightly higher than that proposed by the current planning application. The height of adjacent dwellings is similar to the proposed commercial developments.. All new applications will be subject to the Built Environment policy</p>
	<p>CDC</p>	<p>These two policies are confusing as they duplicate part of the site in each policy. It is not clear therefore what is actually being proposed and allocated. These two policies and supporting text need to be reconsidered carefully in the light of the application that is being progressed.</p> <p>The application LX/20/01977/FUL which has been submitted by Antler Homes has the intention of superseding application LX/19/01498/FUL, whilst still providing the required village shop/convenience store and providing access to the land at the rear of Black Hall. Furthermore, at 16.8.8, it outlines the size and tenure proposals from application LX/20/01977/FUL. It is premature to include such detailed information as the site is currently being assessed by the Development Management team and other issues surrounding the mix and tenures, density and green space are currently being negotiated with the applicant.</p> <p>Depending on the outcome of that application it is suggested the two policies are carefully reconsidered and amended to potentially form one single policy in any subsequent iteration of the plan to clarify the position.</p>	<p><b>Disagree</b> – The planning history for the commercial site, which was an integral part of the Nursery Green Development, has been carried forward from the original NP. The Call for Sites only identified the land to the Rear of Black Hall and not the Commercial Land as this wasn't then owned by the same developer. Furthermore, planning consent has not yet been granted for the combined site and thus the Revised NP cannot anticipate this decision. If planning application is refused, it is possible that the Commercial site could be sold on separately with the existing outstanding planning consent.</p> <p>The policy has been amended to remove references to LX/20/01977/FUL. The wording of para d) Traffic Calming has been amended per CDC comments.</p>
<p><b>16.27. Land West of Guildford Road</b></p>	<p>3</p>	<p>Southern Water must be held to their upgrade commitment and provide a plan for it within six months</p>	<p><b>Noted</b> – There is a planning condition, number 6, which has been applied by CDC to this planning consent. This requires the developer to agree a satisfactory waste and surface water</p>

			solution for this site to be delivered in advance of any occupation.
5	A sensible site but not with the extra by pulling down Hawthorn Cottage ( should be Hollyview House)as envisaged by Reside.		Disagree – The consultee is incorrect. The Developer is Thake Ham homes, not Reside and the house which is planned to be demolished is Hollyview House – not Hawthorn Cottage.
Southern Water	<b>Southern Water supports the inclusion of criterion d) within Policy 6. Furthermore, our assessment of this site has revealed existing underground infrastructure that will need to be taken into account when designing site layout. A further policy criterion should therefore be added to Policy 6 that states ‘Layout of this site will need to be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes’</b>		<b>Agree-</b> The policy has been amended to reflect Southern Waters comment’s -
13	<b>What a shame. This large chunk of pastoral land has been railroaded into the settlement boundary extension and must be the northward limit of the village boundary.</b>		<b>Noted</b> - The Settlement Boundary in the revised NP now reflects, by necessity, all proposed allocated sites. As a consequence, this allocated site forms part of the northern most part of the Settlement Boundary
16	<b>I welcome the re-routing of the path as it will be of a better standard and allow residents to walk around the village using it as an alternative to the pavement. Loxwood should offer a range of size of housing. 18.5 dwellings per hectare seems unlikely to encourage builders to provide houses of 1 or two bedrooms.</b>		<b>Noted</b> - The site already has planning consent and the permission requires 15 affordable houses to be built ranging from one to four-bedroom houses. The density of the site is 17 houses per ha
17	<b>Generally supportive as long as all the promises around play areas, other green spaces, traffic calming and surface and foul water are kept and we don’t see an application for further houses go in when it becomes uneconomical for the developer to keep the promises. Also, there should be no impact on the bridleway at the back of the proposed development.</b>		<b>Noted</b> - The site has planning consent requiring the amenities which the consultee is referring to be provided
WSCC	<b>Criterion c – it should be noted that planning permission for LX/20/01481 provided a link through to the PROW network linking to the Nursery Green site so it may not be considered necessary that the suggested footway or crossing is provided in order to make the development acceptable in accessibility terms.</b>		<b>Disagree</b> - The PROW does not link to the Nursery Green Site. There is no continuous footpath on the western side of the B2133 linking this site to the rest of the village.
Historic England	<b>Historic England does not object to the allocation of this site for development. Section F of this policy introduces the following clause, which is repeated in a number of subsequent policies: <i>A density of up to 18.5 dwelling per hectare, unless the design and conformity to the village</i></b>		<b>Partially Disagree</b> - The text of the policy allows for a different density if the vernacular of the site supports a different density. The policy

		<p><i>vernacular and other policies within this revised Neighbourhood Plan support a different density.</i></p> <p>We advise that this text is amended in order to provide more clarity. We propose that the phrase ‘support a different density’ be changed to ‘necessitate a lower density’. Without this clarification the original phrase is too vague and may be interpreted to allow for a higher density, which could cause undue harm to nearby heritage assets. This amendment should be applied to all repeated iterations of this clause within the Plan.</p>	<p>wording within the Built Environment Density policy has been amended as follow :-s.</p> <p><i>All new developments allocated under this Revised Neighbourhood Plan should have a density of approximately 18 dph unless the design and conformity to the village vernacular or other policies within the Revised Neighbourhood Plan support a different density.</i></p>
	CDC	<p>This site has planning permission but the layout plan is for an earlier version rather than the approved scheme. This should be updated. Site should be retained in the draft NP even if it has secured planning permission to guard against the site/permission not being built out. Criterion a) – as part of the application the mix was assessed prior to the use by housing officers of the HEDNA. The Strategic Market Housing Assessment 2012 (SHMA) was used in the assessment of the housing mix. Alternative wording may read that the open market and affordable housing mix is required to be delivered in accordance with the planning permission, or HEDNA including any successor or amending document or policy.</p>	<p>Agree- Policy amended to reflect CDC’s comments.–</p>
16.28. Land South of Loxwood Farm Place	1	<p>A potentially dangerous access to this site requires traffic calming measures as a priority.</p>	<p><b>Noted</b> – This site already has Outline planning Consent including access. Traffic calming contribution is addressed in policy 20, however the planning application details the provision of a Vehicle Activated Sign at a location as yet to be agreed.</p>
	3	<p>The developers proposal is laughably inadequate. The site should include additional public parking for the shops and a roundabout access.</p>	<p><b>Noted</b> – This site already has Outline planning Consent including access. Traffic calming contribution is addressed in policy 20, however the planning application details the provision of a Vehicle Activated Sign at a location as yet to be agreed. <b>Noted</b> – see above</p>
	5	<p>I know this has been passed but I reiterate my feelings that it is in a very dangerous part of the B2133</p>	<p><b>Noted</b> – This site already has Outline planning Consent including access. Traffic calming contribution is addressed in policy 20, however the planning application details the provision of</p>

			a Vehicle Activated Sign at a location as yet to be agreed.
	6	<b>Dangerous part of B2133 to put access for development</b>	<b>Noted</b> – This site already has Outline planning Consent including access. Traffic calming contribution is addressed in policy 20, however the planning application details the provision of a Vehicle Activated Sign at a location as yet to be agreed.
	13	<b>The submitted plans look fine provided the development is fully screened and set back from the main road. This must be defended as the southern limit of the settlement.</b>	<b>Noted</b> – This allocated site forms part of the southernmost part of the revised settlement boundary.
	17	<b>Generally supportive as long as all the promises around play areas, other green spaces, traffic calming and surface and foul water are kept and we don't see an application for further houses go in when it becomes uneconomical for the developer to keep the promises.</b>	<b>Noted</b>
	WSCC	<b>It should be noted that any traffic calming measures will need supporting evidence as to their suitability and effect on the operation of the highway network, including assessing the requirement for street lighting. Any traffic calming measures will be assessed as to their suitability as part of any planning application on site.</b>	<b>Noted</b> – The site already has Outline planning consent including suitability of access and a Vehicle Activated Sign as a contribution to traffic calming at a location as yet to be defined.
	Historic England	<b>Of the site allocations included in the Plan, Historic England is most concerned about the development of the “Land South of Loxwood Farm Place”. Although we do not officially object to the allocation of this site for development, we do wish to raise our concerns around the potential impact to the historic environment. A non-designated medieval moated site is known to be located in close proximity to the north of the allocated land and there is potential that archaeological remains related to this may extend in to the development site itself. There are also five Grade II listed buildings which are located opposite the site, along the eastern side of the High Street. Furthermore, the site has historically been known as ‘limekiln field’. Although there is no indication of the remains of such a structure within the site, there is still potential for archaeological discovery relating to this possible use.</b>	<b>Agree</b> - Although this site has outline planning permission and has a condition requiring an archaeological investigation to be carried out, in order to protect against the lapse of the planning consent, the policy will be amended to reflect the requirement to carry out an archaeological investigation

	<p>Historic England acknowledges that an outline planning application for 24 dwellings on the site has been approved and that, as a result, this site necessitates inclusion in the Plan. We also recognise that the proposed development has been found to have minimal negative effects on the heritage assets in question. The potential for harm to the designated heritage assets, however, has been considered to be limited due to the dense and high treed hedge to the eastern boundary of the site. Even though this may currently act as a screen, there is still potential for the new development to cause harm to the significance of the listed buildings if this treed hedge should be removed or damaged.</p> <p>The significance of the moated site has not been sufficiently considered with the Plan’s site assessment. As a result, Historic England supports the conditioning of pre-development archaeological investigation on the site, consisting of written scheme of archaeological investigation and initial trial trenching. In order to ensure that the Plan reflects the potential archaeological significance of the site, we propose that the following text be added to policy 7:</p> <p><i>The design of the development, including the layout of buildings and open space, is to be informed by a programme of archaeological investigation, conducted according to a brief agreed with the Council’s archaeological advisor, and is designed to preserve remains of importance in-situ, giving the greatest weight to any remains of national interest. Where the preservation of remains is not merited they should be recorded to an appropriate level of detail prior to their loss. Provision should be made for interpretation of the site’s past, as revealed and made available within the village either on site or at another suitable location.</i></p> <p>Historic England also advises that a requirement be added to the policy, stating that any development within the allocated site may not exceed a maximum of two storeys, so as not to detract from the setting of the listed buildings opposite. In addition, dependent upon the results of the archaeological investigation, any development must be positioned a sufficient</p>	<p><b>Partially Agree</b> - Policy 14 c) already restricts the height of all new developments to a maximum of 2 storeys. No further policy amendment required.</p> <p><b>Noted</b> – This is a detailed planning condition requirement and as such should be addressed by the LPA</p>
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		distance from any archaeological remains and the aforementioned treed hedge so as to avoid damage or disturbance to either.	
	CDC	<p>This site has planning permission and should be retained in the draft NP to guard against the site/permission not being built out. The policy should refer to minimum residential dwellings.</p> <p>Criterion a) - The policy seeks to prescribe a minimum number of 7 affordable homes. It is advised this should read a minimum policy percentage of 30% affordable housing including 7 affordable homes on site and a 0.2 affordable housing financial contribution, calculated in accordance with the CDC Planning Obligations and Affordable Housing SPD.</p> <p>Criterion b) – As per comments to Policy 6 above criterion a), this site was assessed under the SHMA. The wording should be similar to that outlined above.</p> <p>Criterion c) suggest amend text to refer to density ‘of approximately’ 18.5 dph rather than ‘up to 18.5 dph’ as this reflects the approved application (around 20 dph) and provides some flexibility if the site does not come forward as envisaged.</p> <p>Suggest minor amendment to criterion f) to refer to a Management Company rather than residents association as this reflects the S.106 agreement.</p>	<p><b>Agree</b> – Policy amended to reflect a minimum number of dwellings and also to reflect 30 % affordable dwellings. Density amended to reflect a minimum of 18 dph</p>
<b>16.29. Land to the Rear of Black Hall</b>	3	The density envisaged is wholly inadequate for parking provision and residents will occupy the retail site parking	<b>Noted</b> – The provision of adequate parking for both housing and the Commercial part of the current planning application is the responsibility of CDC and WSCC. This Revised NP in policy 5 b). requires parking for the commercial development to be within the Commercial site and not in this site.
	5	Very suitable making same public footpath is maintained.	<b>Noted</b>
	10	See 16.5 and this new application of reduced dwellings. Will LPC now fully support this revised application so that we can at last have the promised shop.	<b>Noted</b> - LPC have already commented on the planning application for this site
	Antler Homes	<p>Antler Homes was pleased to see that the Land to the Rear of Black Hall is the Parish Council’s preferred development site.</p> <p>Para 16.8.13. requires the Applicant to negotiate traffic calming measures with the Neighbourhood Plan prior to submitting an</p>	<b>Partially Agree</b> - Para 16.8.13 has been amended together with policy 8 d). to remove this requirement.

		<p>application. The policy should not be written to restrict the right to submit an application.</p> <p>The current scheme has been reviewed by WSCC with regards to any highway improvements required and the applicant has completed a Road Safety Audit that has been submitted to Chichester District Council.</p> <p>The current scheme, attached for reference, is a reduction on the proposed plan shown within the policy. The plan accords with the requirements of the proposed policy. Specifically:</p> <ul style="list-style-type: none"> <li>• Detailed flood risk assessment and foul/surface water drainage details have been provided.</li> <li>• A S257 application has been submitted to Chichester District Council with respect of the PROW, requesting its relocation through a designated and upgraded path.</li> </ul> <p>As such, the application currently under consideration is a high quality proposal that will accord with all of the aims of the Neighbourhood Plan, through providing the shop, a mixture of market and affordable housing, improvements to the PROW and suitable technical details with respect to transport and drainage.</p> <p>As with 16.5 above, it is our view that both allocations should be merged together to allow more opportunity for a better development to serve the needs of the village to be provided</p>	<p><b>Noted</b></p> <p><b>Noted</b> – The Consultees comments relate to the detail of a current planning application and are not relevant to this Revised NP</p> <p><b>Disagree</b> - The commercial site was part of the Nursery Green development in the current Made NP policy 5. The site still has a current planning consent for a retail development on the site (19/01498/FUL). Land to the rear of Blackhall is a separate parcel of land which came forward as part of the call for sites for the revised NP. Accordingly, both sites have been kept separate in order to provide continuity with the original NP and to protect against either: - 1). the current planning application by Antler Homes not gaining planning consent and 2). to safeguard against the permission not being built out if the current Antler Homes application does gain consent. It is considered that the retail development parking would be better suited and safer if it is located adjacent to the retail outlet.</p>
	15	<p>The current proposal by Antler Homes is for 19 houses giving a density of 24 dwelling per hectare. Given the very great need for the new village shop and considering the viability of the development this density does not seem excessive.</p>	<p><b>Disagree</b> - The 14 dwellings allocated on the Land to the Rear of Black Hall is commensurate with the housing density policy. This stipulates an approximate density of 18 dwellings per hectare increasing the allocation to 19 dwellings would create an overcrowded site which would not fit the vernacular of the surrounding area.</p>

		<p>Under the current Antler proposal for 27 dwellings on the combined Commercial and Black Hall site the overall density is 29 dwelling per hectare. For the Commercial site alone the density under the permitted 'Marda' proposal was 69 dwelling per hectare. This is reduced to 55 in the Antler proposal.</p> <p>Policy 8 should be changed to recognise that 18.5 dwelling per hectare is unrealistic if the proposed shop and housing development is to proceed.</p>	<p><b>Disagree</b> – These density figures are not recognised as valid.</p> <p><b>Disagree</b> - See comments above</p>
	16	<p>When members of the community ranked the choice of proposed sites, the number of houses was 26. The views of the community chose it as its first choice in the knowledge that 26 houses were proposed.</p> <p>The new application by Antler has reduced the number of houses to 19 which does not seem excessive.</p>	<b>Noted</b>
	17	<p>Generally supportive as long as all the promises around play areas, other green spaces, traffic calming and surface and foul water are kept and we don't see an application for further houses go in when it becomes uneconomical for the developer to keep the promises. I'm a little concerned that the access to the site may take out some of area designated for parking for the proposed shop. When a development at Black Hall was first considered some years ago, it was envisaged that access would be via Hall Hurst Close</p>	<b>Noted</b>
	Historic England	<p>Historic England does not object to the allocation of this site for development. As with policy 5 we do, however, have concerns about the impact that this may have on the locally listed Black Hall, which is in close proximity to the site.</p> <p>Building on this site will surround Black Hall with development. In order to ensure against the enclosing of Black Hall, the remaining aspects of its green setting should be preserved where possible.</p> <p>In addition, the design of the access route to the site should take into consideration the significance of this locally listed heritage asset and the desire to sustain and enhance it.</p>	<p><b>Agree in Principle However-</b></p> <p>Black hall is NOT a listed building but is included in appendix 2 of the NP and revised NP as a heritage asset.</p> <p>Since the revised NP was written, a revised planning application has been submitted which improves the layout. The planning application will be assessed against the existing Made NP in which policy 14 ( i ) applies and which has been carried through in the Revised NP.</p>
	CDC	See comments above under Page 31 and Policy 5.	<b>Agreed</b> – See comments as per Page 31, Policy 5
<b>16.30. Loxwood House</b>	3	The additional traffic at the entrances to Nursery Green make these access points now inadequate and roundabouts are needed on the B2133 or traffic lights at the retail site.	<b>Noted</b> - See Traffic Calming Policy 20 where suggested scheme include the provision of pedestrian crossings.

	5	Very suitable but again bordered by public footpath	Noted
	Southern Water	<p>Southern Water has undertaken an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for 30 homes at Loxwood House. The assessment reveals that local wastewater infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of infrastructure.</p> <p>Whilst we agree with the need for some of the provisions in criterion h) of Policy 9, we would support it on the basis of the following additions (underlined);</p> <p><i>h) A foul and surface water disposal plan to be submitted with the planning application demonstrating that a connection to the nearest point of adequate capacity can be established without exacerbating the existing foul and surface water drainage capacity, to the agreement of Southern Water.</i></p> <p><u>Occupation of development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider.</u></p>	Agree - The policy will be amended to reflect Southern Water's preferred wording.
	13	What a shame. The old roadway running behind should be fully screened and protected.	Noted
	17	<p>Generally supportive as long as all the promises around play areas, other green spaces, traffic calming and surface and foul water are kept and we don't see an application for further houses go in when it becomes uneconomical for the developer to keep the promises.</p> <p>Also, there should be no impact on the bridleway at the back of the proposed development. I have noted that there are some markers (Wooden stakes) that have been put into the ground on the bridleway, which could imply that part of the existing bridleway will be given up to the development. These stakes are a health and safety hazard!!!</p>	Noted
	Historic England	<p>In order to determine the suitability of this site for development, more detail about Loxwood House is required. It is currently unclear whether Loxwood House is the locally listed heritage asset Loxwood Hall. If this is the case, its demolition would require clear and robust justification. As already advised, the location of locally listed heritage assets and how these have been assessed needs further attention and clarity within this Plan and should</p>	Noted – Loxwood House is not Loxwood Hall which is a separate local manor house north of the village boundary. The Site of Loxwood House is not located near any listed building or buildings of historic interest nor is it of any historic interest in itself being of mid 1970s construction.

		be considered in greater detail through the inclusion of an additional historic environment policy	See previous comments about this point being raised by Historic England.
	CDC	<p>Para 16.9.13 – text needs to be amended to reflect that the location of the SuDS should be determined by the ground water monitoring undertaken. Without this information it will not be possible to confirm the location of the SuDS pond or indeed what level of drainage infrastructure on site will be required.</p> <p>References in this policy and others to a ‘condition’ of the policy should be amended to refer to a ‘requirement’ of the policy (as conditions relate more to planning permissions). Again housing figures should be expressed as minimum figures.</p> <p>As per comments to criterion ‘a’ of Policy 8, the prescription of a set amount of affordable housing should be amended to simply reflect the 30% requirement of CLPKP Policy 34. This is because if densities change, the corresponding amount of affordable housing will change.</p> <p>Criterion c) relating to specific density seems overly prescriptive. It is likely that various designs and layouts may be acceptable at potentially higher densities than this which will enable the best and most effective use of the land.</p> <p>Criterion e) - suggest this requires some minor rewording to reflect a Management Company rather than residents association</p> <p>Criterion f) – question the inclusion of this, does the telecommunications mast need to be moved and would it be viable to do so?</p>	<p><b>Agree</b> – references to a SuDS pond deleted.</p> <p>Text changed from “condition” to “Requirement” in 16.9.10</p> <p>Affordable housing references now to 30%. All other comments accepted and NP changed accordingly.</p>
<b>16.31. Local Green Spaces policy</b>	5	Due to density of housing the gardens are very small so children need safe places to play and ride bikes etc. Loxwood Green is totally unsuitable right on the road with no fencing- others OK.	<b>Noted</b> – Local Green Spaces are not designated play areas necessarily.
	10	Why is the proposed Green Space at Farm Close not included here.	<b>Noted</b> - The site does not yet have a valid planning application and thus any proposed green space cannot be designated. See para 16.10.3 d).
	11	Essential to maintain village appearance and feel.	<b>Noted</b>
	Antler Homes	It is noted that the Nursery Green square has been provided as requested by the Neighbourhood plan and was an overprovision of public space required for the development.	<b>Noted</b>

	12	No mention is made of the garden area of the Onslow Arms (a listed building) which is partly used as a builders and materials storage yrd by WACT. This is a totally inappropriate use and should be discouraged as your council in this plan seeks to crete a green corridor along the length of the canal. This conflicts with your reduced density Policy 13 on issues of density per se and para 16.13.6 which seeks to maintain “the impression of open space and a country village atmosphere”. Your Plan has obviously been rushed and is inconsistent and untrue in many respects.	<b>Noted</b> – Cannot allocate a private garden area as a public open space. LGSs are required to mee the criteria in the NPPF.
	13	Vital to keep these spaces protected. I would like to see a less ambiguous phrase than ‘seek’ to protect.	<b>Noted</b> – The use of the word “seek” occurs in the preamble para 16.10.3 and expresses the aim of this policy. The policy wording is more definitive and positively identifies the areas of green space protected under this policy
	Historic England	This policy sets out select green spaces within the settlement boundary which are to be designated as local green spaces. Of most interest to Historic England is the land at North Hall and Jubilee Gardens. It is important that this policy establishes whether either of these green spaces have been identified for their historic interest or significance. If so, this should be made clear within the policy in order to support the protection of these spaces	<b>Noted</b> - however North Hall dates back to only the 1930’s and Jubilee Gardens was not a site of any historic interest and was part of the curtilage of a bungalow which was demolished to make room for a modern development adjacent to this site on Station Road
	CDC	Para 16.10 - the criteria jump from (d) to (j)	<b>Agreed</b> – Numbering amended
<b>16.32. Street Lighting Policy</b>	1	The existing village design statement must be applied for policies 16.11 – 16.14 and 16.17	<b>Disagree</b> - The Village Design Statement does not address street lighting.
	5	No Street Lighting use a torch if necessary.	<b>Noted</b>
	8	Perhaps existing street lighting could be turned off after a certain time of night to conserve energy and reduce light pollution?	<b>Noted</b>
	9	Minimal street lighting desirable!	<b>Noted</b>
	10	Hopefully LPC will continue the dark skies policy	<b>Noted</b>
	13	Agree. Minimal low level only where absolutely justified. Current lighting in eg. Farm Close is set too high and has a high colour temperature that isn’t necessary. No expansion into areas already developed.	<b>Noted</b>  <b>Noted</b> - A neighbourhood plan cannot dictate lighting provisions on private property. It can

		I would like to see a statement referencing individual frontage lighting, especially movement sensitive flood lighting (which invariably results in 'light trespass'). This should comply with guidelines set out in the Outdoor Lighting Basics section of the International Dark-Sky Association (IDA)	only propose that future developments apply a no street lighting policy except for safety or road traffic considerations.
	16	I agree that new housing developments should not feature street lighting.	<b>Noted</b>
	17	<b>I feel the policy should be extended to remove the existing street lighting in a drive to reduce unnecessary energy consumption. Glebelands is not on the list, but there is also street lighting there and it serves no purpose. Let's help the planet and also the council to save some money to be reinvested in something more worthwhile.</b>	<b>Noted</b> - This Revised NP cannot remove existing street lighting it can only propose that future developments apply a no street lighting policy except for safety or road traffic considerations.
<b>16.33. Waste Water and Surface Water Policy</b>	2	There is also a link included in Section 16.12.13 to <a href="http://loxwood-pc.gov.uk/flooding">loxwood-pc.gov.uk/flooding</a> . This link takes you to an out of date section of the Parish website. The information contained under 'Preferred Options' is no longer relevant, nor is the 'Presentation' referred to in the Flood Forum Meeting 13 November 2019.	<b>Disagree</b> – the link takes you to the current Flood Forum page of the current parish Council web site however it has now been removed. The content of the link reflects the historic activity of the Flood Forum and is not relevant to the Revised NP thus the link has been removed.
	3	I support the effort made here to explain the difficulties. I believe OFWAT should be approached directly on these issues.	<b>Noted</b>
	5	If building takes place Southern Water have got to improve waste water system otherwise building cannot take place so Chichester must put pressure on Southern Water.	<b>Noted</b>
	9	Current mains water and sewage capacity is unable cope with any further demand!	<b>Noted</b>
	10	Very difficult and a real problem with conflicting parties, especially with the Loxwood building boom. Good luck.	<b>Noted</b>
	Southern Water	16.12.5 Southern Water does not agree that it has failed to recognise the legal rights of developers to connect to the sewer network. We are well aware of our legal obligation under Sections 94 and 106 of the Water Industries Act 1991 (WIA 1991) to provide developers with the right to connect to a public sewer regardless of capacity issues. This, in conjunction with Section 91 of the Act means that we are unable to object to development on the grounds that there is no capacity in the network.	<b>Agree</b> - These words have been removed from the policy  <b>Noted</b>

		<p>However, National Planning Policy Guidance (NPPG) on water supply, wastewater and water quality (Paragraph: 019 Reference ID: 34-019-20140306) states that <i>'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'</i> Southern Water's engagement with the planning process, through both local/neighbourhood plan consultations and planning application consultations, aims to achieve exactly this. Where our assessments reveal limited capacity in the local network we will seek policy provision and subsequent planning conditions stipulating that occupation of development is phased to align with the delivery of network reinforcement. The use of such conditions was affirmed in the <i>Barratt Homes v Welsh Water (2009)</i> ruling, <i>'If the developer indicates that he intends to deal with the problem of sewerage by connecting to the public sewer, the planning authority can make planning permission conditional upon the sewerage authority first taking any steps necessary to ensure that the public sewer will be able to cope with the increased load. [...] Thus the planning authority has the power, which the sewerage undertaker lacks, of preventing a developer from overloading a sewerage system before the undertaker has taken steps to upgrade the system to cope with the additional land.'</i> (our emphasis)</p> <p>Therefore, whilst there is a separate statutory regime governing the provision of sewerage and wastewater treatment under the WIA 1991, there is a need to work together with the local planning authority to ensure that new connections to the sewer are properly managed.</p> <p>On a separate point within this paragraph, it should be noted that changes to the new infrastructure charging regime implemented in April 2018 by Ofwat may have contributed to the perception of an inconsistent approach to new sewer connections. As a water industry we are regulated by external bodies such as Ofwat and the EA, therefore when regulations are introduced or amended, we are legally bound to comply with these changes. To avoid the perception of inconsistency, we can only suggest that any future regulatory changes could be better communicated with external stakeholders.</p> <p>On the basis of the above points, we cannot support paragraph 16.12.5 unless</p>	<p><b>Partially agree</b> - The text starting at "including a failure" ... to "Supreme Court judgement" The remaining text in the para. Has been kept as it</p>
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	<p>the following amendments are made (new text underlined);</p> <p><i>16.12.5. At present, there are numerous planning applications for new developments throughout Alfold and Loxwood. <del>Unfortunately, both Thames and Southern Water have shown a totally inconsistent and uncoordinated approach to these potential new sewer connections, including a failure to recognise that there is an absolute legal right for a developer to connect new onsite sewerage to the existing public sewer network (Supreme Court Judgement 2010). To ensure any necessary planning for additional network capacity can occur in a timely manner, Southern Water encourages early engagement from developers, through its dedicated online developer portal. <a href="https://developerservices.southernwater.co.uk/">https://developerservices.southernwater.co.uk/</a></del></i></p> <p><i>16.12.7 With reference to paragraph 16.12.7 we would point out that under the aforementioned changes to rules for new infrastructure charging, (implemented by Ofwat in April 2018), water companies set their own fixed charges for water and wastewater connections, and these are reviewed annually, so that where analysis of historic expenditure indicates that the previous year’s wastewater supply infrastructure charge did not fully recover the costs of network reinforcement, there is an opportunity to increase these charges in the following year – see <a href="https://www.ofwat.gov.uk/wp-content/uploads/2018/07/19-07-22-Charging-Rules-for-New-Connection-Services-English-Undertakers-from-April-2020.pdf">https://www.ofwat.gov.uk/wp-content/uploads/2018/07/19-07-22-Charging-Rules-for-New-Connection-Services-English-Undertakers-from-April-2020.pdf</a>. It should be noted that there are site specific charges to the developer, to fund connection pipework, on top of the infrastructure charge, which contributes to the funding of network reinforcement.</i></p> <p>We therefore cannot support this paragraph unless the following amendments are made (new text underlined);</p> <p><i>16.12.7. There is now a standard infrastructure charge for each new property, which is deemed to provide funding for <del>all</del> <u>any</u> wastewater network upgrades necessary to <u>support new development</u>. <del>Some Water Companies regard the level of infrastructure charge to be totally inadequate to fund significant upgrades to wastewater systems, even though they have a statutory obligation to take the necessary action to carry out works to accommodate new sewer connections. More information about charging arrangements can be found on Southern Water’s website;</del></i></p>	<p>is factual. The suggested text inclusion by SW has not been added as it not considered material that should be included in a NP</p> <p><b>Partially agree</b> – the text starting at “Some Water Companies .....to....Accommodate new sewer connections.” Has been removed. Further text has been included to highlight the need for a coordinated approach to new developments throughout Loxwood and Alfold parishes.</p> <p>A new policy paragraph b) has been added reflecting Southern Water’s comments on Loxwood House Policy 9 and Land West of Guildford Road – Policy 6 to require a planning condition which stipulates that foul water infrastructure upgrades should be implemented prior to occupation of the development.</p>
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	13	<p>This policy sounds robust and relevant. Developers must absolutely be held to the guidelines and liabilities. Does the council have plans in place to contest any postponement/ digression/evasion put forward by developers or Southern Water?</p>	<p><b>Noted</b> – The policing of this policy is not the function of the Revised NP</p>
	17	<p>For all the developments there need to be a sustainable approach to surface water and restrictions on hard surfaces for drive ways etc. We are going to see more severe weather events due to global warming. Maybe we need to look at a way of saving the water during wet periods (in Bermuda houses have rainwater tanks in the basements and the water is used to flush toilets/ water gardens).</p> <p>All developments must have a way of dealing with foul water that will not overwhelm the existing infrastructure before houses can be built. It is not acceptable for existing residents to have to live with raw sewage running down Guildford Road when the tanks are overflowing.</p>	<p><b>Noted</b> Surface water provisions are made in the policy.</p>

	CDC	<p>There is considerable extensive detail over several pages in this section. It is agreed that this is a significant issue for the parish; however, it may be helpful to include much of the text in an amplified background evidence paper and to summarise only the key issues and considerations in the draft plan.</p> <p>At this stage CDC raises concerns and questions the proposed PC approach to these issues. Dialogue will be required not only with Southern and Thames Water but also with the Environment Agency as to the provenance of this work, whether or not it can be taken forward and to understanding how such a local approach can be potentially utilised in the draft plan and development management decisions. In exploring this approach, the role of the PC Flood Risk model will also need to be considered further including what weight may or may not be given to the model.</p>	<p><b>Noted</b> - The policy on Waste and Surface water has been split into two individual policies in order to simplify the approach in the Revised NP.</p> <p><b>Partially Agree</b> - The approach detailed in the policy has the general support of Southern Water as reflected in their comments as a consultee to this revised NP. The policy has been revised and split into two separate policies and the role of the PC Flood Risk Model restricted to information only with more emphasis placed on the EA modelling</p>
<i>Built Environment – Housing Density Policy</i>	3	<p>16.13.1 penultimate line “states”.</p> <p>The crowded appearance, lack of car parking and volume of traffic at 16.8 is especially pertinent.</p>	<p><b>Noted</b> - Unclear what the consultee is referring to as no such text appears in a16.13.1</p>
	5	<p>One thing that stands out is the lack of provision for bungalows. With an ageing population if there is no room for a stair lift life is very difficult, and some properties need doors wide enough for wheelchairs.</p>	<p><b>Noted</b> - The planning consent for the Development West of Guildford road provides for 2no. 2 bedroomed bungalows as open market properties</p>
<i>16.34. Built Environment – Housing Density Policy</i>	6	<p>Hawthorn Cottage. Agree with the plans suggested 10 houses but definitely not with Reside Developments proposed 21.</p>	<p><b>Noted</b> – However Hawthorn Cottage is not an allocated site under this Revised NP. It may come forward as a windfall site and will be assessed as such on its merits at that time.</p>
	9	<p>Larger and less numerous homes would help maintain the areas rural character</p>	<p><b>Noted</b> The density policy seeks to ensure that the Built Environment of new developments is in conformity with the vernacular of its location and would not prevent larger homes being delivered on sites as part of a mix of units</p>

	10	<p><b>This policy does not appear to be applied consistently and seems to be subject to the whim of certain councillors</b></p>	<p><b>Disagree</b> - This is a new policy in the Revised NP designed to apply a consistent approach to the issue of density on new allocated sites within the NP. Any previous applications would have been considered against policy 9 of the current “made” NP. Planning applications that have already been determined on allocated sites within this Revised NP conform to this policy.</p>
Antler Homes		<p><b>It is our view that a prescriptive density is not appropriate. Paragraph 122 of the NPPF seeks to ensure decisions support development that make efficient use of land, taking into account the identified need for different types of housing, other forms of development, the availability of land suitable for accommodating it, local market conditions and viability. Additionally, Paragraph 123 of the NPPF states where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. Should a density be set, it should accord with the Local Plan. Paragraph 17.5 of the Chichester Local Plan states that the Council maintain a flexible approach towards housing density as a result of recognising the importance of balancing the need to make efficient use of land with the characteristics of the surrounding built up area. Within the Local Plan, 35dph has been recommended as being an appropriate level of density for the district</b></p>	<p><b>Disagree</b> – Loxwood parish is defined as being semi-rural and as such should not conform to the density appropriate to an urban setting. This is supported in the NPPF under para 122 d) which states that the desirability of maintaining an area’s prevailing character and setting (including residential gardens). The current Local Plan under policy 33 sub para 5 and the LPR policy DM3 states <i>“All new housing will be developed at a density that is consistent with making the best use of land whilst achieving high quality, sustainable design that does not compromise the distinctive character of the area in which it is located”</i>. In formulating the revised NP Density policy, the average density of all developments over the last 30 years was calculated at approximately 18 dph. This is the figure that has been used in this revised NP in conformance with both the NPPF and Local plans. Also, the density set in the policy is not prescriptive and allows for varying densities where the design and conformity to the village vernacular and other policies support a different density</p>
	12	<p><b>Policy 13 is a nonsense and conflicts with Government policy of maximizing land use for housing, which is also supported by CDC. So your Plan is in conflict when them as well.</b></p>	<p><b>Disagree</b> – See comments in para above</p>

	13	Fully support.	Noted
	16	I agree that building styles should not be 3 storeys high. I would add that there should not be an excessive bulk in either houses or buildings. All should demonstrate careful design of pitched roof elevations.	Agree – However Policy 14 c). states that heights should be restricted to 2 storeys <b>where possible</b> . This allows consideration for any circumstances that require a different approach in the design of buildings.
	CDC	Para 16.13.4 – this para makes reference to the need for the emphasis to be on good design and layout. In that respect applying a specific density figure (a maximum of 18.5 dph) to a site will potentially restrict high quality design solutions that may come forward. It is important to make the best and most effective use of land or this may lead to other land being brought forward unnecessarily. It is also difficult to see how an alternative density figure on a specific site could be agreed in advance with the PC. This policy is therefore considered to be overly restrictive and should be reconsidered and amended.	Partially Agree – Density rounded to approximately 18dph.  The last sentence requiring LPC agreement in advance removed.
16.35. Built Environment – Vernacular Policy	5	The Parish Council have got this right but the dark slate tiles do stick out among clay tiles.	Noted
	6	There is a house in Burley Close which recently boarded its perimeter with a boarded fence which is higher than the specified 6ft maximum height. How was this allowed – it looks dreadful and totally not in keeping. Others have been made to reduce the height to 6ft.	Noted – However this has no relevance to the Reg 14 Revised NP consultation
	8	Could mains gas piping be extended out to the village?	Noted - However this has no relevance to the Reg 14 Revised NP consultation. A Neighbourhood Plan cannot dictate such issues.
	9	We must ensure the design style enhances the environment and not blights it! Action must be taken to ensure HGV - traffic movements are kept to minimal level's including dealing with spoil on-site.	Noted
	12	Policy 14 is in breach of government Policy, e.g. .A) is too restrictive. So I item C0. Again Item d) the use of concrete roof tiles conflicts with item j) as concrete roof tiles do not show “high architectural and rural quality”, which your Parish Council is keen to uphold.	Disagree - This policy is unchanged from the current “made” NP. This policy was formulated from the existing Village Design Statement – a document defining the vernacular of the village

			and adopted by the Parish Council in July 2003. The references made by the Consultee are from this document and with respect to the current village vernacular, nothing has substantially changed since then.
	13	Fully support all the points. This will be what defines Loxwood for the decades to come as an attractive West Sussex village.	Noted
	17	Loxwood runs the risk of being a bland village with red brick houses hung with red clay tiles and red tiled roofs. There are many other building styles and materials and it would be nice to have a mix of different house styles. This is not a “chocolate box” village so let’s try and incorporate some more contemporary designs and materials.	Noted
<b>16.36. Wey &amp; Arun Canal Policy Rural Area Policy</b>	1	My comment in 16.3 applies in this case to prevent an important recreational facility becoming polluted.	Noted – It is unclear what the Consultee is addressing with respect to the policies referred to
	5	Very good for dog walks but it is getting more difficult to park. They need to do more to encourage wildlife.	Noted
	9	Supported	Noted
	12	<p>16.15.2 is not relevant as it effects land outside of the parish.</p> <p>16.15.3 Is a biased untrue statement as the landlord of the Onslow Arms has advised that they make no profit at all from supplying catering and other services to WACT.</p> <p>16.15.4 I would seek that the village of Loxwood gain a meaningful financial benefit from WACT and any future waterside development. Yet such further expansion at the Onslow Arms would be inappropriate if the “Green Linear Park” is to be protected as suggested by your plan and WACT as further car parking and their facilities would obviously need to be accommodated. I am fearful WACT are already in conflict with their own intentions by using the listed garden of the Onslow Arms as a builders yard and not as a “linear park” as you and they have intended(in this plan).</p>	<p>Disagree - The para does relate to the Wey &amp; Arun Canal part which runs through the parish</p> <p>Disagree – There is no reference in 16.15.3 to the profitability of the Onslow Arms PH</p> <p>Noted</p>

		<p><b>16.15.6 What views are you referring to? There are none. How do WACT intend to “enhance the facilities of the canal and Loxwood Parish” as you suggest? There are very limited if any “open spaces and outlooks” adjoining the canal at Loxwood. This statement is untrue.</b></p> <p><b>Policy 15 is incorrect. For example:-</b></p> <ul style="list-style-type: none"> <li><b>a) How can the “green corridor” be protected when WACT already have an illicit builders yard in this corridor and you have covertly supported this non planning use for some considerable time?</b></li> <li><b>b) How can you support WACT when they have done nothing to support business and leisure activities as to benefit the village directly. I suggest they give something back to the village by creating more landing stages for say canoists and swimmers and create village clubs for such activity and also by offering safety on the water classes and canoeing initiation courses.</b></li> <li><b>c) What heritage assets are you referring to in wishing to protect? when WACT’s building materials, their plant and machinery and their metal fencing panels take up a large part of your so called “linear park and heritage asset” ....</b></li> <li><b>d) Again you wish “to protect the outlook and vistas from either side of the canal” what vistas? There are none as previously stated adjoining the River Lox. This is not a conservation area, nor SSI nor an AONB.</b></li> </ul> <p><b>Policy 15 is not joined up and is a nonsense. For example :- you state “avoid boats lining the edge of the canal and support will be given to canal mooring located away from the canal” This does not make sense and is a contrary statement to para 16.15.2 encouraging more boats onto the canal. Similarly para 16.15.6 also conflicts with this in that “outlooks either side of the canal will be protected from further development”. Yet more boats especially residential in their use will create further development.</b></p>	<p><b>Disagree</b> - There are extensive views from the Canal towpath and other footpaths on opposing sides of the canal. It is these that this policy seeks to protect.</p> <p><b>Disagree</b> - The Consultee is expressing personal views which have no bearing on this policy in the revised NP regulation 14 consultation.</p> <p><b>Disagree</b> - This para states that future expansion of the canal will encourage more people to want to have boats on the canal. The WACT are keen not to have lines of boats moored at the side of the canal without the provision of suitable and adequate moorings away from but connected to the canal</p>
	13	<p><b>Agree all points. It would be nice if the approach to the canal around the Onslow Arms was more attractive.</b></p>	<p><b>Noted</b></p>
	Historic England	<p><b>The canal is identified in the Sustainability Appraisal as a non-designated heritage asset; however, this is not made clear in the Plan itself. The Plan does consider the view from the line of the canal and the open spaces on each side of it as one of the spaces and outlooks that</b></p>	<p><b>Agreed</b> -The Wey &amp; Arun canal in para Para 10 has been amended to include a statement making the section running through Loxwood parish a non-designated heritage asset.</p>

		<p>helps to form the character of the village. As a result, policy 15 aims to maintain and protect the heritage assets adjacent to the canal and the vistas from either side of it. Historic England supports this aim, but advises that further clarity is given to this policy, in order to identify the heritage assets in question and to better establish what the Plan considered the setting of the canal to be. This information should link to the recommended additional policy on the historic environment</p>	<p>Appendix 2 has also been amended to include the Wey &amp; Arun canal as a heritage asset. Appendix 2 now reflects a map showing the line of the canal with the outlook defined in green</p>
	CDC	<p>Criterion d) is too general; it would help to identify specific views considered to need such protection on a map for reference.</p>	<p><b>Agree</b> – Wording amended to give more precise location of protected outlooks. Appendix 2 now reflects a map showing the line of the canal with the outlook defined in green</p>
<b>16.37. Rural Area Policy</b>	5	<p>Better for redundant buildings to be used that fall into disrepair.</p>	<p><b>Agree</b> - Policy 16 encourages this as does the GDPO.</p>
	10	<p>This policy does not include the proposed Clay Pit. This will be horrible and ruin the wood to the NE of the Parish. LPC needs to have a strong plan to fight this.</p>	<p><b>Disagree</b> – The consultee comment relates to clay and mineral extraction and is not in the remit of this revised NP regulation 14 consultation. Their feelings are noted.</p>
	12	<p>Para 16.16.4 states “the parish does not provide much in the way of employment opportunity” but you offer no remedy. May I suggest one clear answer is to allow “self-build housing on the village outskirts and beyond for this housing type. I am one of many local sub contractors that would benefit. This would also encourage local school leavers to join us and be trained as ground workers, bricklayers, carpenters etc.</p> <p>You state you will support dwellings for agricultural workers, but their numbers are very few and due to automation will or have become extinct. So why not be realistic and support the rural community in a positive manner and allow “self housing”.Your policy 16 is insignificant and of no benefit as it stands.</p> <p>This whole policy is too restrictive. For example agricultural workers are now a thing of the past. Also a lot of “self building” has already occurred outside the Settlement Boundary of Loxwood and this type of development is an intrinsic part and history of the village dating back some 200 years, yet no mention is made of this in your policy.</p> <p>Also a recent Planning Inspectorate decision has been given for “self building” to occur outside a Settlement Area in part because the Local Authority was too restrictive in their</p>	<p><b>Disagree</b> - A Neighbourhood plan is not in control of the number and nature of businesses within the parish. Neither can it single out any one specific type of business to come forward. This policy does encourage new businesses to come forward through the planning process.</p> <p><b>Disagree</b> - The Consultee is expressing personal views which have no bearing on this policy in the revised NP regulation 14 consultation. The Revised NP does not preclude “Self or Custom Build” on land registered for such purposes with CDC.</p>

		rural development policy. Again Policy item e) is typically too restrictive. Most new homes (as above referred) were complete new builds which gave substantial financial benefit to the village, as previously explained. All such buildings needed substantial re- building if not demolition and new build, so Policy 16 e) is a nonsense.	
	13	Agree. But 'mega barn' developments should be kept in check.	<b>Noted</b> - :Policy 16 addresses this point
	17	Let's make sure that this also covers the area where Loxwood Clay Pits want to extract clay and dump waste.	<b>Disagree</b> – The consultee comment relates to clay and mineral extraction and is not in the remit of this revised NP regulation 14 consultation. Their feelings are noted.
	Historic England	In order to ensure sufficient protection for the historic environment, Historic England recommends that this section include an additional clause which specifies that any conversion of farm buildings or barns into dwellings should not result in unjustified or avoidable harm to any heritage assets, whether designated or non-designated	<b>Agree</b> – Text within the policy has been added to reflect this comment
<b>16.38. Housing Extensions Style and Vernacular</b>	3	Any increase in foot print should place an additional responsibility for drainage consistent with mitigating the problems described in 16.12	<b>Agree</b> – Policy 12.3 addresses householder extensions in the same way as for new developments
	5	Extensions should be allowed as long as they conform to match style of the house to which they will be attached.	<b>Agreed</b> – The policy already addresses this point.
	9	Absolutely essential, to ensure the design style matches the villages character and house type.	<b>Agreed</b> – The policy already addresses this point.
	12	This Policy seems somewhat meaningless. 17d) has already been superseded by the very modern WACT enquiry building which immediately adjoins the Grade II listed Onslow Arms public house; and does not conserve the setting, form and character of the Onslow Arms, in any way, which your plan is keen to support. Government policy does not prohibit extensions to be built in a modern style so the new extension is clearly visible as a new extension and many LPAs prefer this approach. Your Policy clause 17 b) breaches NPPF in this respect. Policy 17 d) is a nonsense when compared to the existing consented and built WACT Information Centre, which is a very modern eco building with a green roof, which immediately abuts the listed building and listed garden of the Onslow Arms Pub and is obviously not in sympathy nor does it conserve the setting.	<b>Disagree</b> - The Consultee is expressing personal views which are now irrelevant in the context of the Canal Centre building which was a new building in the rural area – not an extension. Future house extensions will be considered against this revised NP.

	13	Really important. A consistent and appropriate local vernacular will give visual cohesion and character. Imaginative new style builds need to be sympathetic to this. Extensions need to look visually part of the whole.	Noted
	Historic England	In order to ensure that this Plan reflects the tone of relevant legislation, Historic England advises that section D of this policy be amended as follows: <i>Any proposed extension adjacent to a listed building or building of historic interest and/or open space as defined in Appendix 2 should preserve or enhance the significance of the building or open space, including the contribution made by its setting, form and character.</i>	Agreed – policy text has been amended.
	CDC	The guidance note referred to is now somewhat dated has been superseded by the GPDO in terms of potential extensions. Suggest the policy is revised potentially, for example, requiring extensions to be respectful to the scale of the existing dwelling, amenities of neighbours and the size of the plot	Agree – Text amended to reflect current GPDO and text amended accordingly
<b>16.39. Economy and Business</b>	5	Change due to COVID 19 that more and more will need a home office so new builds need to provide for office space within houses.	<b>Noted</b> - Conversion of a room within a new build house is at the discretion of the householder subject to compliance with the necessary planning and building regulation constraints. Policy 19 Broadband supports the necessary connectivity required for home working
	9	Other than household, garden maintenance and of some construction job's, there are few opportunity's in the village itself. Most occupiers of recently constructed homes, commute to work miles away. This makes for a community that is not truly sustainable from an environmental point of view and adds to the considerable levels of congestion being experienced elsewhere!	<b>Noted</b> – The Consultee is making a personal observation.
	12	You say in para 16.18.1 that supporting the local economy is a central theme of the NP, yet your Plan suggests nothing to support this. 16.18.1 states “a stronger local economy is a central theme of the NP then in para 16.18.2 you state “There is an inherent need for self -reliance, data shows that economically active people in the age range 20 to 35 find it harder and harder to remain in the village.... For reasons generally relating to the availability of affordable housing and the ability to obtain local employment”. It therefore seems clear that “self housing” would solve this issue of affordable housing and that would assist also the issue	<b>Noted</b> An NP in its policies cannot support specific businesses. It can only support new business start-ups and the development of existing business by means of the planning system giving generic support to such activities. This is what Policy 18 is seeking to achieve. The site allocations policies all require 30 % of the development to be allocated to affordable

		<p>of local employment, as highlighted earlier. Your Policy 18 should support the three most important local businesses (Indigo cabinets, Loxwood Joust and Skandia- Hus) who incidentally have been sustainable by supporting “self building” and building generally in the District. They have also given back to the community unlike WACT.</p> <p>Clause 16.18.1 I totally agree that economy and community go hand in hand and supporting the growth of a stronger local economy is a central theme in the NP. But the PC do not put this into practice. If you did you would be encouraging “self building” in your plan which brings £450,000 into the local economy by the building of just one home. You seem to have missed this point completely. By not seeking the voice of companies such as Scandia Hus and Loxwood Joust in your NP does not persuade me that you are interested in their input on the plan. This is discriminative and short sighted. Both companies support and add to a stronger economy.</p> <p>16.18.2 You say there is a “need for self reliance” yet it is harder for 20 to 34 year olds to remain due to lack of affordable homes and the ability to obtain local employment”. Respectfully the answer is to allow more “self building” in the parish. Such homes are in themselves more affordable and such build styles invariably uses local trades people and trains young apprentices up, at the same time. Most importantly it brings large sums of money into the rural community.</p> <p>18.18.4 If the PC are intent “on offering core support for a stronger economy” the answer is straight forward. Grant many more “self building” ad be helpful and encouraging of “self building” To date neither have occurred which is a disappointment and discriminative in itself.</p> <p>I believe this policy is shallow and just words without dealing head on with the main issue of needing a stronger rural economy and by excluding Scandia Hus and Loxwood Joust must speak volumes as to the integrity of the revised plan. Yet you have given massive support to WACT, who in practice give nothing back economically to the village or Loxwood and its residents.</p>	<p>housing. Affordable housing can be either be affordable rent or shared ownership.</p> <p>This is the responsibility of the LPA. The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016 defines what support LPA’s must provide to self and custom aspirants. This includes a register of those people who wish to acquire self-build plots of land and LPS’s are required to support planning applications for self-build housing. The parish council does not own any plots of land which could be used for self-build</p> <p>Whilst the NP does not allocate land for self build (and no land has been put forward for this use for consideration), the NP would not preclude self-build development coming forward through the planning application process where any planning application for self-build will be judged on its own merits commensurate with national, district and local planning policies.</p>
	13	<p>Agree, provided any new builds or redevelopments comply as with 16.17. Don’t object to any new design that has its own style merit.</p>	<p><b>Noted</b> Any new development must comply with the policies in the NP</p>
<p><b>16.40. High Speed Broadband Policy</b></p>	17	<p>Better High Speed Broadband should be at the top of the list to enable businesses to work from Loxwood. I note that none of the developments in the plan has any business or retail spaces included.</p>	<p><b>Noted</b> The policy is seeking to ensure that all new development is equipped with high speed -broadband to allow residents to work from home.</p>
	CDC	<p>First para – not clear how well this may have served the parish to date; is there a need to reconsider this approach? The sentiment of the policy is supported but the following comments may be worth considering at this stage:</p>	<p><b>Partially accepted</b> – The word “viable” removed from the policy and references made to ensuring a low impact on neighbouring</p>

		<p>If the business is looking to expand, it would generally go hand in hand that it is viable or they would not either have the funding or be able to raise the funding to support the expansion. How does the PC propose to establish if a business is viable?</p> <p>The following phrase is somewhat ambiguous - “benefit the local economy and the wellbeing of the parish”. It could be said that any business would benefit the local economy. However, by including the wording ‘wellbeing of the parish’ is the PC only hoping to get businesses that support local people in their mental or physical health?</p> <p>Suggest rewording to give clarity on the type of business the PC would hope to see. For example, “Low impact on neighbouring properties and with the potential of offering job opportunities to local people” could work better in terms of measuring the impact of a business expansion.</p> <p>There is no mention in the policy of how existing business premises would be protected from being changed from business to, for example, residential. This may have been an oversight as previously the made the NP was ahead of the CLPKP policy and guidance in Appendix E. The plan and policy would benefit therefore from some updating in this respect</p>	<p>properties with local job opportunities included,</p> <p>Change of use is determined by the GPDO. The CLKP policy 46 and LPR policy DM21 apply.</p>
	5	I don’t know have an I Pad for family and friends so high speed unnecessary.	<b>Noted</b>
	8	Communication of which existing properties are connected to fibre would be helpful, so residents could decide to investigate installation of fibre to the property/house.	<b>Noted</b> - The policy addresses new developments. The WSCC and BT broadband initiative seeks to upgrade the infrastructure to existing households. See link <a href="https://www.westsussex.gov.uk/business-and-consumers/broadband-in-west-sussex/slow-or-no-broadband/">https://www.westsussex.gov.uk/business-and-consumers/broadband-in-west-sussex/slow-or-no-broadband/</a>
	9	Essential to deliver on to encourage home working and cut down on car usage!	<b>Noted</b>
	Antler Homes	The policy should require developers to provide details of connectivity via condition not when applying for planning permission. Providing details upfront is not always possible, particularly in an outline application, as the proposed houses and layouts may be subject to changes.	<b>Disagree</b> - The provision of a connectivity statement at the time the planning application is submitted to the LPA allows for both the LPA and the parish council to review the applicant’s proposals for broadband connectivity and for the LPA to condition such provisions accordingly. With outline applications, the

			requirement to provide a connectivity statement can be subject to reserve matters.
	13	Agree. This constitutes the new standard. Would be good to see some reference to retro fitting and support for current properties distant from a BT roadside cabinet. Even current Hi-speed fibre optic delivery is patchy.	<b>Noted</b> - The policy addresses new developments. The WSCC and BT broadband initiative seeks to upgrade the infrastructure to existing households. See link <a href="https://www.westsussex.gov.uk/business-and-consumers/broadband-in-west-sussex/slow-or-no-broadband/">https://www.westsussex.gov.uk/business-and-consumers/broadband-in-west-sussex/slow-or-no-broadband/</a>
	17	No real benefit to existing residents. We are getting more and more houses, but no real benefit to the existing population, so developers should be made to contribute to infrastructure.	<b>Noted</b> The policy can only address the infrastructure needs of new developments. The WSCC and BT broadband initiative seeks to upgrade the infrastructure to existing households. See link <a href="https://www.westsussex.gov.uk/business-and-consumers/broadband-in-west-sussex/slow-or-no-broadband/">https://www.westsussex.gov.uk/business-and-consumers/broadband-in-west-sussex/slow-or-no-broadband/</a>
	CDC	While the sentiments of this policy are welcome it is difficult to see how this could be required as part of planning policy and planning requirements. It is overly onerous, may well not be viable and would be unlikely to be enforceable. The policy and text need to be reconsidered.	<b>Disagree</b> – Paragraph 112 of the NPPF defines how policies should set out how high quality digital infrastructure should be delivered.
<b>16.41. Traffic Calming &amp; Speed through the Village Policy</b>	1	I have reservations about cycle lanes. Horsham’s current experience with them is creating more air pollution by holding up traffic; they are hardly used most of the time.	<b>Noted</b> - Cycle lanes are just one of a number of traffic calming measure being proposed in the policy. Cycle lanes have been shown to reduce traffic speed and can be shared with vehicular traffic so as not to impede traffic flow.
	3	Making Lanes narrower for cars shows a strange view of priorities given the increase in traffic resulting from new housing. What evidence is there in the village for cycling needs? Most is for leisure cycling or organised racing.	<b>Noted</b> - Cycle lanes are just one of a number of traffic calming measure being proposed in the policy. Cycle lanes have been shown to reduce traffic speed and can be shared with vehicular traffic so as not to impede traffic flow.

	5	Essential Pinch Points priority signs by 30MPH Limits at Farm Houses through village until decontrolled at Vicarage Hill. A crossing by PO and either North Hall to Spy Lane or from Loxwood Green to Twitton to access school.	<b>Noted</b> - The policy seeks to provide a number of traffic calming measures throughout the parish and it is not a definitive list
	6	Agree with this but not with cycle lanes. This is a village with narrow roads/lanes not a town. Please keep it that way. Even a town like Horsham has made a real mess of putting them in and caused chaos and nobody uses them.	<b>Noted</b> - Cycle lanes are just one of a number of traffic calming measure being proposed in the policy. Cycle lanes have been shown to reduce traffic speed and can be shared with vehicular traffic so as not to impede traffic flow.
	9	Please remember to cover all roads including Station Road and Loxwood road in all measures taken. Speed enforcement is poor and needs action!	<b>Noted</b> - The policy seeks to provide a number of traffic calming measures throughout the parish and it is not a definitive list. Speed enforcement is a matter for the police. However, the parish council has a speed watch group that records the registration number of speeding vehicles and submits the data to Community Speedwatch, a police managed group.
	10	Speed of traffic through the village is very fast. Traffic calming must be a priority	<b>Agreed</b> - This is what the policy is seeking to achieve
	11	Essential as traffic and footfall increase. I would like to see road side parking increased outside the shops minimised to improve flow through the village and to safety a pedestrian crossing to road. Need more allocated parking.	<b>Disagree</b> - Traffic calming measures area designed to reduce the speed of flow through the village. Making it easier to transit the village may result in higher traffic speeds.
	Antler Homes	Funding for offsite highway works should only be considered by S106 contributions/conditions where the proposed development has a directly quantifiable adverse impact on the highway. CIL should provide the funding for the items requested within the policy, through either the direct receipt to the County Council or through the receipt provided to the Parish Council as they are general infrastructure requirements. Improvements should only be included in the plan once agreement is reached with WSCC that they are appropriate in highway safety terms	<b>Partially Agree</b> - References to CIL and S106 have been split out to better reflect the appropriate sources of funding.  <b>Agreed</b> - The policy reflects that the design of any traffic calming must be agreed by WSCC. The policy has been amended to remove references to agreement in advance by LPC.
	12	Your major issue of speeding through the village will not be resolved by developer contributions. Your relationship with developers is not good. For example at a very recent PC Meeting your Chairman was adamant that he had not tried to encourage residents to reject one of your own designated sites owned by Antler Homes. Yet the conversation as recorded saying exactly this. Furthermore, this recorded conversation was confirmed by	<b>Noted</b> - . The consultees comment is not relevant to the consultation on the NP

		Antler Homes and further confirmed by a resident of the village. Such conduct by your chair is totally unacceptable and frankly in breach of your own Code of Conduct.	
13		Agree. Footpaths need to be wider and continuous along the B2133. Walkers should not have to cross because a footpath 'runs out'. Traffic calming seriously important. I'm not surprised to read that so much traffic exceeds the 30mph limit. Pleased to see chicanes mentioned at 16.20.22	Noted
15		<p>Speed through the village is a very great concern.</p> <p>Parking congestion around the butcher's shop and Post Office is a concern, however, this congestion is at present the only effective measure slowing traffic in the village – traffic speeds are notably higher on Sundays when the shops are closed!</p> <p>If the new village shop is built, there will be a great many more people crossing Guildford Road from East to West on the crest of the hill. The sight line to the North is very poor at this point and provision of a traffic light controlled crossing at this point should be given high priority with any contribution from future developments 'pooled' together towards funding this crossing.</p> <p>As a keen and active cyclist I am concerned by the idea of using a cycle lane as a traffic calming measure. This would have to be a very narrow cycle lane and such cycle lanes increase the risk to cyclists as motorists believe that if the cyclist is in the lane then it is automatically safe to pass. Further drivers would continue parking over the lane invalidating any value it might have.</p>	<p>Agreed</p> <p>Noted</p> <p>Agreed - Para 2c of the policy addresses this point</p> <p>Noted - Cycle lanes are just one of a number of traffic calming measure being proposed in the policy. Cycle lanes have been shown to reduce traffic speed and can be shared with vehicular traffic so as not to impede traffic flow.</p>
16		<p>Although motorists park randomly around the current shops, it does slow the traffic. If there was clear route, some motorists would drive through at a higher speed.</p> <p>An improvement to the local foot paths where possible making them bridle paths, would allow pedestrians and cyclists to move around the village. Developing a series of network bridle paths in the village and to surrounding villages would provide safe journeys. The road through the village may not be able to have two-way traffic and two cycle lanes.</p> <p>It would be very helpful if the main road was re-surfaced as the removal of the 'cats'eye's has left the road surface in a dreadful state.</p> <p>The re-routing of the current footpath would allow ease of travelling and avoid the need to use the pavement. However, in its current state, it is lined with weeds, the ground is</p>	<p>Noted</p> <p>Noted - Upgrading a PROW footpath to a Bridleway does not fall within the remit of an NP and is very difficult without landowner's permission. The location of the footpath has to be able to accommodate a horse and rider.</p> <p>Noted - Highway repair does not fall within the remit of an NP</p> <p>Noted It is not clear which footpath the consultee is referring to.</p>

		<p>uneven and unsafe for elderly and young children. The height of the weeds during the summer is at the same height of young children.</p> <p>Could we consider a reduction of the speed to 20mph when entering Nursery Green. With a proposed shop there will be an increase of shoppers visiting it and a reduction of speed will minimise the risk of severe injury to pedestrians.</p> <p>Traffic lights to assist pedestrians at the crossing near Nursery Green would allow a safe crossing of Guildford Road. The significant cost of this could be used through 106 from proposed building as it is unlikely that WSCC will ever find the money for such a project. A crossing at this point is helpful for school children, pedestrians and those using the footpaths (upgraded to bridle paths) for leisure.</p>	<p><b>Noted</b></p> <p><b>Noted</b> - Policy 2 C already addresses this point</p>
	17	<p>As with a lot of the developments in the village, we are promised a lot from the developers up front, but it is rarely delivered. We need to wise up and ask for the things that are good for the village to be provided before they start building. Traffic calming should not just amount to flashing 30 mph signs which everyone ignores anyway. Road narrowing chicanes or stretched where Guildford Road is narrowed to one lane would help. When there are lots of cars parked outside of the Butcher and Hairdresser, traffic slows down. A pedestrian crossing at the south end of Nursery Green would be beneficial as it would also lead to the footpath next to Linden Hose, which is a short cut to the school – so no need for people on the west side of Guildford Road to drive their kids to school, which they do. Artificial cycle lanes are a nonsense. Hardly anyone cycles to school or work in Loxwood. I'm not sure that the traffic information from 2019 is still accurate. Since the start of lockdown there have been significantly more HGV movement through the village. It would be good to have the data updated.</p>	<p><b>Noted</b> Most of what the consultee is commenting on is already addressed in the policy.</p> <p><b>Disagree</b> - The traffic data used in the NP was taken from the traffic speed recording grid on the B2133 at North Hall. When the revised NP was written, no full year data was available for 2020</p>
	WSCC	<p>As above, it should be noted that any traffic calming measures will need supporting evidence as to their suitability and effect on the operation of the highway network, including assessing the requirement for street lighting. Any traffic calming measures will be assessed as to their suitability as part of any planning application on site.</p>	<p><b>Noted</b> - The policy states that any traffic calming measures will be subject to the agreement of WSCC</p>
	CDC	<p>Again substantial detail and data is contained in this section that may be better represented and amplified in a background evidence paper to support the policy. A summary of only the</p>	<p><b>Partially Agree</b> – References to agreement in advance by LPC have been removed.</p>

		<p>key issues can then be included in the text.  <b>In general the aims of the policy are supported; however, care needs to be taken in ensuring the correct mechanism is used to secure benefits.</b>  <b>Criterion 1) is not feasible in terms of negotiating in advance of a planning application and for that application to then adhere to those negotiations. This criterion needs rewording and further consideration.</b>  <b>Criterion 2) – need to separate out what is considered as part of Community Infrastructure Levy (CIL) and what refers to Section 106 agreement (S106). CIL sits outside a planning application and therefore need to be clear what is being sought through S106; the test is that contributions would have to mitigate the needs of the development itself, need to be appropriate in scale and directly related to the development. For example, the policy cannot seek requirements in Station Road if the development is not in Station Rd, equally cycle lanes throughout village under S106.</b>  <b>The PC can choose how it wishes to spend CIL monies and can also seek funding from other sources, e.g. WSCC etc.</b></p>	<p>Disagree that a separate document is necessary. Such documents tend not to be accessed when considering the NP.</p> <p>References to CIL and S106 have been split out to better reflect the appropriate sources of funding.</p>
<b>16.42. Environmental Characteristics Policy</b>	5	<p><b>Developers must keep all mature trees and hedges and keep developments as much as possible.</b></p>	<p><b>Noted</b> - Paragraph 2 of the policy reflects this point</p>
	Antler Homes	<p><b>Policy 16.1 – No comments.</b>  <b>Policy 16.2 – The replacement of trees should take into account their quality rather than requiring equal replacements.</b></p> <p><b>Policy 16.3.3 – Suggest changing of wording to ‘and/or beyond the site’.</b></p> <p><b>Policy 16.4 – No comments.</b></p>	<p><b>Disagree</b> - The objective of this policy is to prevent the unnecessary reduction in the number of trees in any particular development and part 2 of the tree policy does take into account quality as it links to part 1 which refers to ‘high quality/good trees’  <b>Noted.</b> - Wording means the same as already used in the policy</p>
	12	<p><b>This is commendable yet it fails to identify “Self housing” as a remedy. Certainly developer housing will not reflect “high quality” or local “destructiveness” that the NP is seeking. Yet again only “self housing” will achieve this. Again you say “good high quality design is</b></p>	<p><b>Disagree</b> - The policy addresses all types of development and does not exclude Self Build. There is no correlation between the statement</p>

		crucial” (para 16.21.13 yet this can only be achieved by “self housing” and not by major housing developers.	on housing quality between self-build and developer led developments.
	13	Agree. Very comprehensive and vital.	<b>Noted</b>
	17	All new houses to be built on a carbon neutral basis.	<b>Noted</b> – Paragraph 4.1 of this policy seeks to minimise the carbon footprint by using energy efficient methods of construction
	Historic England	As with section 7 on The Natural Environment, Historic England advises that this policy be renamed as “The Environmental and Historic Characteristics Policy”. As well as setting out the characteristics of the landscape and natural environment, this policy also refers to elements of the historic environment and this should be clearly indicated to decision makers.	<b>Disagree</b> - This section addresses the Natural Environment and is taken from the CDC Landscape Capacity report. It is important to keep the historic environment and landscape environment separate in order to ensure clarity. Paragraph 8 addresses Heritage Assets.
	CDC	<p><b>Section 1 Landscape and natural environment</b>  <b>Criterion 1) – this conflicts with the requirements for open space in the planning obligations SPD and should be reconsidered and amended.</b>  <b>Criterion 2.2) - replacement trees are not be provided in consultation with the PC but would be subject to a condition where necessary.</b></p> <p><b>Section 3 Biodiversity</b>  <b>Criterion 3.3 – it is not always feasible to require ‘mature’ trees as they are likely to require significant maintenance to ‘take’ and be retained. The text may need some adjusting on this point.</b></p> <p><b>Section 4 Sustainable design and construction</b>  <b>Criterion 4.1 – wording could be strengthened and suggest following the example of the criterion 8 in the CDC Interim Housing Policy (IPS) in this respect.</b>  <b>Criterion 4.2 – delete the wording in brackets as this will be soon out of date. The provision changes each year and the level of provision is dependent on the year the development is implemented.</b>  <b>Criterion 4.3 - this is overly onerous, impracticable and unenforceable. The wording should be reconsidered</b></p>	<p><b>Agree-</b> Policy amended to reflect the Open Space obligations in the SPD</p> <p><b>Agree</b> - Reference to prior agreement by LPC removed</p> <p><b>Agreed</b> – Text amended to reflect to remove the word “mature” from the sentence.</p> <p><b>Disagree</b> - but wording added to include water consumption</p> <p><b>Agree</b> – Bracketed text removed.</p>

			<p><b>Agree</b> – Although this policy is trying to promote good design in connection with conversions and extensions, it has been amended with text changes to clarify the meaning of the policy and to make the policy less onerous.</p>
<p><b>Other Comments</b></p>	3	<p>7.1 Loxwood is north not “south” of the National Park</p> <p>11.3 a new convenience store is “proposed” to be built.....development, “ but” is...</p> <p>11.6 .....and higher speed broadband</p> <p>11.8 Since new residents are expected to be primarily of working age they will have a need for car parking above average.</p> <p>12.4 This is an assertion without evidence. How many residents have downsized in recent years? None of the older residents I know have downsized from their family home.</p> <p>16.5.2.... but due to the developers reserving by covenant the site for the mini supermarket as access to the land to the rear of Blackhall the mini supermarket promised was not built.</p>	<p><b>Agreed</b> - Wording has been amended</p> <p><b>Disagree</b> – Para reference should be 11.4. Wording is correct as there is already a planning application under consideration with a retail store contained within it – therefore it is already “planned”.</p> <p><b>Agree</b> – Para reference should be 11.7. Text amended to add reference to higher speed Broadband.</p> <p>Disagree – Para reference should be 11.9. Text as written indicates the need for “adequate” car parking. This is sufficient conditionality for the NP</p> <p><b>Noted</b></p> <p><b>Noted</b> – Consultee understanding is not quite accurate. Text as given is considered adequate</p>
	4	<p>I appreciate the work that has been undertaken to get to this stage and the Parish Council is to be commended for its approach to challenging Government dictates and intervention for purely political gain.</p> <p>In general principle I am against the expansion of housing of any type within Loxwood as it will have a negative impact on its rural character as a result , if the debarkle with the Co Op and local post office is anything to go by then perhaps we can do without that as well .</p> <p>Now we are being asked to fight against proposed industrialisation with Clay Pits , and no doubt farm based environmental processing has not been totally forgotten.</p>	<p><b>Noted</b> - It is not clear what the Consultee is commenting on in relation to the Revised NP. It is not possible to predict future outcomes in this NP.</p>

		<p>Not to mention 3000 homes to be created in Dunsford and continued developments around Billingshurst and Horsham. So why is Loxwood being asked to ruin its tranquillity as well.</p> <p>What I would like to raise is the yet to be realised impact of the pandemic. Technological improvements that were gradually being realised and understood have been accelerated.</p> <p>I would respectfully ask for this to be considered in relation to the plan. People can work from home or are able to spend less time in an office environment, major companies are starting to question the need for huge office blocks.</p> <p>The benefits from this are significant, less time spent in transit, improving air quality and negating the need for further investment in road infrastructure.</p> <p>Today some offices are being converted to rented accommodation, I would argue that this is set to continue at pace. Town and City centres will be attractive places to live and work. We ignore this change at our peril, it must be considered as its impact will be a sea change on the way we live today.</p> <p>So my plea is consider what's happening now, nobody could have predicted a pandemic and its potential benefits on our society when proposing a political driven housing boom. If a large proportion of affordable housing is delivered from existing office accommodation,</p> <p>What would the impact of this be on the current plan ?</p>	
	10	The LPC have a difficult job and although I may criticise I thank you for the work you do to ensure Loxwood can remain a lovely village not a town.	Noted
	11	Whilst it is with dismay that I hear we have a requirement to build more dwellings in our beautiful village, having read the revised Neighbourhood Plan I feel we are in good hands and commend all the work everyone involved has put into it to ensure the essence of Loxwood will remain.	Noted
	12	<p><b>Appendix 2 Buildings Settings and Spaces Brewhurst Land</b></p> <p>" The setting of the collection of buildings in this area are a significant asset to the village". This is not true. The word significant is too exaggerated a word. Only in the last year has one listed property been renovated. Other listings still require substantial renovation as do others which are not listed including the road itself (Brewhurst Lane) which is dangerous and you do nothing about it. So how can the area be classified as significant if the PC don't actually support to make it "significant".</p> <p>Spaces and outlooks " The line of the canal and the open space and vistas on each side" is a misnomer. That is to say there is no open space and vistas on the west side of the canal</p>	<b>Disagree and noted</b> - The Consultee is making a number of personal comments from his/her own perspective which do not reflect the views obtained from the majority of Parish Residents who have been continuously consulted over the current "made" and this Revised NP over many years.

		<p>nearest the river lox. This is private land with along hedgerow abutting the path and running the length of the tow path for about 1 mile and more past Drungewick Bridge, which obscures long views and even the adjoining Lox River. Your statement is untrue. I do not support the NP in its present form</p> <ol style="list-style-type: none"> <li>1) The plan was undertaken prematurely before the CDC revised Local Plan is in place and prior to the Government’s new planning policies have been published, which will happen shortly.</li> <li>2) The revised plan has been a costly exercise created by the egos of the primary writers of the plan.</li> <li>3) The plan does not adhere to the NPPF or the ethos of what it seeks to achieve. In particular your reduced housing density policy in the village, when NPPF clearly wishes to see higher densities and full utilization of available housing sites. Similarly your plan ignores self building contrary to the NPPF. Other issues such as increasing the rural economy and higher design and building standards will not be resolved by developer build in the village. I am surprised you have not sought to support Self builders as they are more than capable of dealing with these 2 major issues.</li> <li>4) Your plan was rushed through without proper scrutiny or consultation by Parish Councillors. In consequence it has many inaccuracies of fact over fiction. Similarly many policies and prior paragraphs are inaccurate and not joined up or they conflict with one another including policies 10,13,14,15,16,17,18 because in art they are contrary to the NPPF and recent Planning Inspectorate Decisions.</li> <li>5) The plan is biased and discriminative against self builders and similarly does not support Scandia Hus or Loxwood Joust but only WACT. I am not encouraged by the biased volume of support for WACT or that WACT will be encouraged to expand their operation and also the number of canal boats which in theory could be for residential occupation. As you must know such full or part time residential use of boats is a major issue in many local authorities both visually environmentally and conservationally and give no protection of the water course on issues of bio-diversity.</li> <li>6) The Plan has a wish list of issues outside the control or remit of the PC and therefore they should be excluded.</li> </ol> <p>The plan has major omissions which it has not addressed including:- financial support offered directly and indirectly to the village and the rural community via self and custom built housing; all the support and benefits offered by 2 major companies to the village which are not even recognized in the plan.</p>	
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	<p>14</p>	<p>I would like to respond with regard to the choice of sites made by the Steering Group and their planning consultant. Loxwood Farm was put forward in the call for sites by the Parish but has not been taken up in the current Draft. It is only my intention to promote a one for one replacement as a self build dwelling maintaining the same boundaries with garden land and private woodlands being maintained similar to the current position. The site of my proposed new home was one of those that has so far been rejected. I would now like to bring to your attention that this site assessment has been done without dialogue with me as the owner and without the benefit of a site inspection by the steering group or its planning advisor. As a consequence it is my belief that mis-statements of fact have arisen via the Parish Councils Site Assessments template and contrary to this recognized template.</p> <p>I believe the revised Neighbourhood Plan:-</p> <ul style="list-style-type: none"> <li>• is grossly inaccurate as to our site assessment in both its statements, facts and conclusions and such inaccuracies undermine trust in the process. This is also reflected in other assessments. (the Wharf Site as just one example)</li> <li>• Is inconsistent and lacking in 'back up' facts and figures.</li> <li>• Is in part 'inspirational' on certain issues outside the remit or control of the Parish Council (PC).</li> <li>• Does not in part support or mirror the draft emerging DC Local Plan, which it is duty bound to do (e.g. The PC is not supportive of Self and Custom Build).</li> <li>• Cannot reduce or ignore existing housing density and other policies. This is contrary to NPPF and the recent Housing White Paper and CDC policy..</li> <li>• Is premature, as the CDC Local Plan is still emerging and not in place.</li> <li>• In consequence is 'before time', is therefore time-wasting of limited village funds and resources, is not cost effective and is in breach of PC duties and responsibilities.</li> <li>• Lacks integrity and is defective and unsustainable.</li> <li>• Should include higher standards of build and design, including the use of green, eco technologies, in line with Government policies.</li> <li>• Is therefore not fit for purpose and should be rejected.</li> </ul> <p><b>INTRODUCTION</b></p> <p>I am very disappointed to see that yet again Self Build is not included in the revised</p>	<p><b>Disagree</b> - The purpose of the Regulation 14 Consultation on the proposed Revised NP is to obtain comments on the proposed policies contained therein. The Consultee is critiquing the site assessment process with respect to Loxwood Farm which he put forward in response to the Call for Sites issued by the Neighbourhood Plan Steering Group (NPSG). The NPSG issued a questionnaire to all residents on the choice of development sites proposed for Loxwood as a result of this Call for Sites. As part of that consultation, all of the site's assessments were made available on the Parish Council website. The consultation closed on 30th June 2020 and all residents had the opportunity to comment on the site assessments at that time.</p> <p>Ten sites were put forward for consideration but two of the sites including Loxwood Farm are located in the countryside, remote from the Settlement Boundary of Loxwood Village and thus were deemed not to be policy compliant for large scale development within the countryside.</p> <p>The Site Assessment process used a template and guidance material from Locality, a nationally accepted resource for guidance on neighbourhood planning. As part of the process, the NPSG cross-checked its assessments for all sites to ensure a common approach was used. Further the site assessments were validated by the Steering Group's Planning Consultant.</p>
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	<p><b>Neighbourhood Plan (NP) yet quite a few such homes have been supported and consented by CDC in the intervening years.</b></p> <p><b>As you know I am passionate and experienced in Self and Custom Build Housing (S &amp; CB) with some 50 years of high level experience in the property business and in my self-building knowledge as a self-builder. As you already know our proposal on this site will be for a very high standard of sustainable green bespoke eco-home both in design and build, up to the highest level of Passiv-Haus standards thus creating mix, diversity and variety in our village. Also as an encouragement to all others wanting to S &amp; CB in Loxwood as a means of seeking to raise the standards of housing in Loxwood and in supporting others to ‘aspire’ to S &amp; CB – all in line with NPPF, the recent Housing White Paper, CDC’s emerging Local Plan, a recent statement in the House of Commons by the Secretary of State for Housing and a new further statement by the Housing Secretary, also recent positive planning appeal decisions by Pins and recent High Court case law.</b></p> <p><b>COMMENT 1<sup>SEP</sup> I would seek to encourage your PC to insert a positive beneficial statement in your Neighbourhood Plan review, as you are required to do so under NPPF guidance, in support of S &amp; CB in the village, as I am very sure the NP as submitted will not be accepted in its present formulation.</b></p> <p><b>Ideally this should go beyond mere compliance with the expectations of the self and custom build Register maintained by CDC, showing leadership and real ambition which encourages a range of opportunities and innovative delivery mechanisms to come forward over the life of the plan, as to directly benefit our village and its residents.</b></p> <p><b>The Secretary of State for Housing the Hon Christopher Pincher MP recently confirmed the Government’s commitment yet further to owner – commissioned housing. He stated:-</b></p> <p><b><i>“As we come together as a nation, we strongly believe that Self &amp; Custom House- builders can play a crucial role by boosting housing supply and re-invigorating and diversifying the housing market”.</i></b></p> <p><b>COMMENT 2-APPRAISAL OF LOXWOOD FARM</b></p> <p><b>The Steering Group Assessment (as stated is in red print as is the originating template</b></p>	<p>Given the above statement, the NPSG do not intend to comment in any further detail on the Consultee’s comments about the process of assessment for the Loxwood Farm Site. .</p> <p>National planning policy and guidance recognises that neighbourhood plans can come forward in advance of Local Plans.</p> <p>The NP will not prohibit self-build homes from coming forward.</p> <p>It appears that the site proponent is referring to one dwelling being delivered on the site. To clarify, the entire site put forward by the landowner was considered for development through the site assessment process (not just for 1 replacement dwelling). The Neighbourhood Plan is not allocating sites of less than 6 dwellings (which are counted as windfall).</p> <p>Various comments are made regarding the site assessment for the Loxwood Farm site, a number of which are inaccurate. A desktop exercise (in addition to viewing the site from the highway) was undertaken on the entire site which raised constraints which may not be known to the landowner. These are noted but are not considered to change the overall site assessment.</p>
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		<p>question ) and my reply is in black.</p> <p><b>(A) Existing Land Use? --- House and paddock</b></p> <p>This site is not a house and paddock. It is a bungalow and garden with additional unfenced woodland around the whole boundary. Moreover, the legal definition of a 'paddock' is a small enclosed field for pasturing/exercising horses or other animals. The actual site is not small or enclosed nor used to graze animals. It is a frequently cut garden lawn with attended adjoining woodland (in total comprising 9 acres) and has been for many years. I have legally signed documents to confirm this, countersigned by lawyers.</p> <p><b>(B) Planning History (Live or previous)? --- none</b></p> <p>I have yet to submit an application. When this is prepared it will include the previous history.</p> <p><b>(C) Neighbouring uses? --- Southwest boundary overlooks Grade II listed building</b></p> <p>Our bungalow and development site does not 'overlook' a Grade II building. Our bungalow is some considerable distance away (450 metres) and hidden behind 3 acres of separating dense woodland (at the time of your report).</p> <p><b>(D) Site is predominantly or wholly within Flood zones 2 or 3? --- needs site visit, medium risk</b></p> <p>No site visit was undertaken. How is it possible for our new house to be within a 'Medium Risk' area when it is some 20 metres (66ft) or more above the river level and in a position that has never been flooded? A simple site visit would have made this evident. Moreover your own Figure 14 in your Plan does not show our development site within flood zones 2 or 3.</p> <p><b>(E) Is site at risk of surface water flooding? --- Low risk</b></p> <p>Our house is at no risk of surface water flooding. It is on a gradient. Again a site visit would have shown this and none have been subsequently requested.</p>	
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	<p><b>(F) Is there existing vehicle access or potential to create vehicle access to the site? --- Yes but on private land, owners permission required.</b></p> <p>There is existing (3 historic long-standing access points) onto the site. It is not true to say the road owner's permission is required to use the three existing access points. The points of access and egress are enshrined in our title deeds. Again we were never asked, nor the site visited to ascertain. Access points are visible and can be seen to be used as such. Again a site visit would have clearly shown this. Since then no site visits have been requested.</p> <p><b>(G) Is there existing pedestrian/cycle access or potential to create such access to the site? -- pedestrian - no, cycle – yes.</b></p> <p>The site immediately abutts the road Brewhurst Lane which is a tarmaced road, designated a bridleway. So it obviously has pedestrian, cycle and car access. Also for horses at any time. How can the site have cycle access (as stated) but no pedestrian access?</p> <p><b>(H) Significant trees (within and adjacent)? - yes within the area to be developed. Area surrounding existing building is heavily wooded.</b></p> <p>Incorrect – the area to be actually developed (some 4 acres) is open grassland garden with no trees. The immediate area surrounding our bungalow is not heavily wooded, it is open garden. The heavily wooded areas are on the boundaries of our large 9 acre plot down to the River Lox. Incidentally (1) if the Steering Group describe it as 'heavily wooded' here how can you previously describe it as 'paddock' (under item A) and subsequently as overlooked from the canal towpath (under item L)? (2) Furthermore it is our intention to plant large trees in our open garden area to create yet more privacy.</p> <p><b>(I) Potentially veteran or ancient trees present? --- Yes</b></p> <p>Incorrect - the ex Chair of the Arborticultural Association and renowned High Court expert witness Dr. Giles Biddle has advised us that the trees in question are not veteran or ancient trees. The majority of the trees are large Poplars planted recently yet we have no intention of felling any healthy trees, as they offer privacy and great enjoyment and well-being.</p> <p><b>(J) Would development of the site result in a loss of social amenity or community value? ---</b></p>	
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	<p><b>Yes housing would be seen from canal towpath</b></p> <p>Untrue – (1) we have spoken to most of the residents in Brewhurst Lane. Apart from one who lives 500 metres away and will not see the proposed house, and is seldom in residence, they are supportive of our intention of building a beautiful high end, very sustainable bespoke eco friendly home which is in oak and lime render framing in keeping locally, and would add value (in design terms) to the Lane but also add interest, beauty, substance, credence and diversity to our community as a whole, especially in our Lane.</p> <p>(2) Our house would not be seen from the Canal towpath. As you already recognise our site is heavily wooded around its perimeter. Moreover there are 4 long heavily wooded tree belts between the Towpath and our site.</p> <p>Belt 1 is a row of long established hawthorn and oak trees which immediately abutts the path some 6 metres (20ft) high and more.<sup>[SEP]</sup> Belt 2 was installed with landowner consent by myself and my immediate river neighbour some 11 years ago. It is heavily wooded and comprises a double bank of native trees 3 metres thick and some 5 metres (17ft) high planted adjoining the river bank on the North side of and abutting the river.</p> <p>Belt 3 is our Poplar wood which is some 100 metres (335ft) deep and comprise 100 large Poplars to a height of 30 metres (100ft). This wood was planted some 60 years ago by the landowner farmer as a production wood for ‘matches’.<sup>[SEP]</sup> Belt 4 was planted by me 11 years ago with some 400 young coniferous laurel trees. It is now very well established and is a very dense belt some 4 metres (14ft) high and 3 metres (10ft) thick.</p> <p>So in total the 4 well established and dense tree belts range over a direct distance of 710metres (2,310ft) from the towpath and up to a height of 30 metres. The towpath is 6 minutes walking distance from our proposed new home. The overall thickness or density of these 4 substantial tree belts is approximately 111 metres thick.</p> <p>Our intended planning application will demonstrate the replacement dwelling is fully in keeping and sympathy with its setting, and respectful of oak framed housing nearby in Brewhurst Lane and of the village vernacular which also demonstrates oak framing with rendered infill paneling on homes, within our village, some of which are listed buildings.</p> <p><b>(K) Distances to community facilities? ---</b> (see attached Schedule A)<sup>[SEP]</sup> Given the context of a</p>	
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	<p>single replacement dwelling the site is in a very sustainable position. For example:-</p> <ul style="list-style-type: none"> <li>* the bus stop and B2133 is at the bottom of Brewhurst Lane (3 minutes walk)</li> <li>* the Onslow Arms pub is very close-by (5 minutes walk) as are the recreation facilities of Brewhurst Lock on the canal (6 minutes walk)</li> <li>* Our church similarly is close-by (4 minutes walk)</li> <li>* cycle route – immediately adjoins the site in Brewhurst Lane</li> <li>* walking route – immediately adjoining the site in Brewhurst Lane and is used daily by numerous local and visiting walkers, horse riders, cyclists and runners.</li> <li>* The Wey and Arun Canal at Brewhurst Lock is also close-by (6 minutes walk). It is a major local and visitor attraction from many miles around.</li> <li>* Loxwood Sports Clubs is the only local sports and social club in the village and in the immediate area. It houses the football club, the cricket club and squash, snooker, stoolball and fitness clubs. This is close-by our site (10 minutes walk)</li> <li>* Loxwood Medical Centre is close-by and only 8 minutes walking distance.</li> <li>* In olden days Brewhurst Lane was the main thoroughfare through Loxwood. The lane and the site is arguably the second closest location to all the major village facilities than other sites designated in your plan. To say this site is remote from the settlement area is totally untrue. This also applies to places of nature, beauty, mental well-being and tranquility within our village, which abound in the area of Brewhurst Lane and our site.</li> </ul> <p>(L) Indicator of suitability in terms of visual amenity? Your answer --- high sensitivity, visible from canal towpath, Brewhurst Lane and overlooking listed building</p> <p><b>My Comment</b> This statement is grossly untrue in every one of your examples mentioned</p>	
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		<p>e.g.</p> <p>(1) The canal towpath is 6 minutes walk away. Between this towpath and our site are 4 thick belts of trees up to a height of 30 metres. These belts have a combined thickness of 111 metres and range continuously over a distance of 710 metres. Therefore visibility is near impossible. [SEP]</p> <p>(2) Again visibility of the site from Brewhust Lane is very slight if at all. Our dense hedge onto the lane is an ancient hedgerow and is on average 4.6 metres high (15ft) and 3.3 metres thick (11ft) behind which is a second new laurel hedge (72mm or 28 inches) thick and 1.2m (4ft) high giving a total boundary thickness of 15ft. This is not relevant anyway. [SEP]</p> <p>(3) Again the listed building (Brewhurst Mill) certainly does not overlook our site. It is 450 metres away (3 minutes walk). The Mill and our existing bungalow and site are well protected by our own dense oak wood and dense woodland and scrubland belonging to the Mill (at the time of your survey). [SEP]</p> <p>(4) Our site is clearly of low sensitivity. The site is visually enclosed on all its boundaries and has very low (if any) inter-visibility with the surrounding landscape. Moreover, it is not in an SSI or in an area of Outstanding Natural Beauty. It would not adversely impact any 'identified views' as there are none. Your assessment has previously admitted that the site is heavily wooded along all its boundaries (see item H). [SEP]</p> <p><b>(M) Indicator of Sustainability – Would the Development of the site cause harm to a designated heritage asset or its setting? [SEP] Your answer --- Yes Site is adjacent to a grade II listed building [SEP] My comment - the listed building is 450 metres away (a considerable distance) in planning terms and is very well screened. It therefore has no impact. [SEP]</b></p> <p>Notwithstanding as an example of precedent, the nearby pub and its garden (Onslow Arms) is also Grade II and immediately abutting it (only 8.2 metres or 27ft away) is the Wey and Arun Visitor Centre which was built a few years ago. This is obviously within the pub grounds (which are also listed) yet CDC granted consent for the centre albeit very modern and eco and totally out of keeping with the listed building; because CDC deemed</p>	
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		<p>the centre as having no visual or aesthetic impact on the pub or on the surrounding area.</p> <p>Another example, Loxwood Farm Place was built opposite Willets which is listed and the Steering Group are recommending the Moat site as one of the sites to be developed which is directly opposite 4 listed cottages. You can't have one standard for one site and not for another. You have no consistency of argument.</p> <p>I therefore believe there is also a lack of credibility and merit to your argument. Moreover the Moat site is now consented contrary to the Parish Council's objections. Again no comment was made by the PC at the time that it adjoined 4 listed buildings, so clearly your argument is also biased and discriminative.</p> <p><b>(N) Would the development of the site cause harm to a non-designated heritage asset or its setting?</b></p> <p><b>Your Answer --- yes the site will be visible from the Wey and Arun Canal towpath which is a listed heritage asset.</b></p> <p>My comments - this is untrue (see my comments above and earlier). The site is not visible from the towpath and therefore would have no impact. Also why would building one house in the style of other houses in the lane (some 450 metres away from a listed building) be any more detrimental than Mill Cottage whose owners have done a tremendous amount of development, including a new build garaging block and a granny annexe, which is only (4 metres) from Brewhurst Mill, a listed building? The Parish Council had no objection to this development although it is immediately abutting a listed building. In fact this week the PC supported a further planning application at Mill Cottage for change of use of outbuildings to a residential annex to the main home.</p> <p><b>(O) Is the site greenfield, a mix of greenfield and previously developed land?</b></p> <p><b>Your answer – a mix of greenfield and previously developed land.</b></p> <p>My comment – not correct. In strict planning terms it is previously developed land.</p> <p><b>(P) Is the site within, adjacent to or outside the existing settlement boundary?</b></p>	
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		<p><b>Your answer --- outside and not connected to the existing settlement boundary</b></p> <p><b>My Comment – Incorrect. The site is outside yet connected to the existing settlement boundary which is about to be extended even further and closer to Brewhurst Lane. The site is within its own small hidden enclave of some 18 homes and apartments comprising Brewhurst Lane. Moreover in Brewhurst Lane and very close-by, are recently consented and built some 6 Self and Custom built homes. All are individual and of merit, in keeping with the local vernacular and all are outside of the settlement boundary yet obviously inextricably connected to it. {Refer also to recent S &amp; CB planning decisions won on appeal with PINS}.</b></p> <p><b>(Q) Assessment of Availability<sup>(SEP)</sup> Are there any known legal or ownership problems etc?</b></p> <p><b>Your answer --- yes needs permission from landowner for use of private land.</b></p> <p><b>My comment – this is totally false. We do not need any landowner consent to use the road. We have used the road unhindered for 12 years as did the previous occupiers for 60 years and more. I suggest you view our title deeds as confirmation. Also view the site and you will see that the access points are well used and easily delineated.</b></p> <p><b>(R) Is there a known timeframe for availability?</b></p> <p><b>Your answer --- 0-5 years</b></p> <p><b>My comment - Incorrect. The site is immediately available now. Moreover as compared to all the other sites adopted in the proposed Neighbourhood Plan it has no restrictions as to prior development. For example there are no issues as to flooding, surface water issues or flooding due to surface or foul water egress or contamination of adjoining houses/gardens, nor foul water connectivity. All of these being major issues in our village yet on the PC designated sites list. It is also far more sustainable and zero carbon intentional and is to be built to an exceptional standard of passiv-build and build per se. All in keeping with new Government policy; this can't be said for any of your designated sites.</b></p>	
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		<p><b>(S) Is the site subject to any abnormal costs that could affect viability?</b></p> <p><b>Your answer --- yes demolition of existing property</b></p> <p>My comment - I am a qualified quantity surveyor. Demolition to the trade value of £2,000 is certainly not an 'abnormal cost'. It is a very minor and standard cost. Such a cost would certainly not affect viability of my proposals and is therefore not deemed as 'abnormal' in any professional calculation or determination.</p> <p><b>YOUR CONCLUSIONS</b></p> <p><b>(T) The site is suitable, available and achievable?</b></p> <p><b>Your Answer --- not currently suitable available and achievable.</b></p> <p>My Comments - This is a false and totally misleading statement. How can you say in the summary to your conclusions – <b>Talk to applicant as intentions not clear, unable to complete the assessment?</b> and then you still complete the assessment and say the site is not currently suitable, available or achievable? Also we were never spoken to nor was the site visited or assessed. The site is undoubtedly 'suitable' and certainly 'available'. We own it without any encumbrances. This can't be said of your other designated sites especially the Farm Close site which has remained un-developed albeit consented, for many years. Moreover, some ten S &amp; CB replacement schemes have been approved locally in Loxwood and over 50 schemes in the immediate area.</p> <p>There are 57 listed buildings in Loxwood. In particular the development of Brewhurst Mill, Mill Cottage and Fletchings Hollow (all in Brewhurst Lane) were not referred for refusal by the PC because of immediately adjoining listed buildings or proximity to the canal and viewability. Moreover Oakhurst Farm (whose owner I believe is a member of the Steering Group) has not suffered by negative arguments from the Parish Council on their re-development of their land holdings, albeit there are 3 listed buildings on their land, which all adjoin their own specific development sites. This seems somewhat biased, especially so at this time, when the requirement for more housing is substantial (300,000 new homes per year, year on year, for the foreseeable future).</p>	
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	Natural England	No specific comments.	<b>Noted</b>
	Sport England	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive</p>	<b>Noted</b> - Para 6.3 i).and d) describes the sports and recreational facilities available within the parish. These facilities are considered to be first class providing a range of sporting activities for the residents of Loxwood and neighbouring parishes. These facilities are considered to be more than adequate for a parish the size of Loxwood and no new

		<p>planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document. <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p>	<p>provision is deemed to be necessary except the upgrading of these facilities as required. The Chichester Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy report supports this conclusion.</p> <p>Policy 10 – Open Green Spaces Policy, defines and protects the land associated with the sports facilities and the village hall.</p> <p>The Sports Facilities are considered to be sufficient to meet the additional need anticipated by the increase in housing provision within the parish. The Chichester Open Space, Sport Facilities, Recreation Study and Playing Pitch Strategy report supports this conclusion.</p>
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		<p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work.</p> <p><a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p>	<p>The revised NP allocated site policies require that developments provide onsite green space in order to enhance the amenity value of the development and sustain the health and wellbeing of the residents.</p>
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	<p>WSCC</p>	<p>Loxwood Neighbourhood Plan Review Regulation 14 – WSCC Services Officer Level Comments – July 2020</p> <p><b>The focus of the County Council's engagement with the development planning process in West Sussex is the new Local Plans that the Districts and Boroughs are preparing as replacements for existing Core Strategies. Whilst welcoming the decisions of so many parishes to prepare Neighbourhood Plans, the County Council does not have sufficient resources available to respond in detail to Neighbourhood Plan consultations unless there are potentially significant impacts on its services that we are not already aware of, or conflicts are identified with its emerging or adopted policies.</b></p> <p>In general, the County Council looks for Neighbourhood Plans to be in conformity with the District and Borough Councils' latest draft or adopted development plans. The County Council supports the District and Borough Councils in preparing the evidence base for these plans and aligns its own infrastructure plans with them. The County Council encourages Parish Councils to make use of this information which includes transport studies examining the impacts of proposed development allocations. Where available this information will be published on its website or that of the relevant Local Planning Authority.</p> <p>In relation to its own statutory functions, the County Council expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals, where applicable. These documents include the West Sussex Waste Local Plan, Minerals Local Plan, West Sussex Transport Plan and the West Sussex Lead Local Flood Authority Policy for the Management of Surface Water. It is also recommended that published County Council service plans, for example Planning School Places and West Sussex Rights of Way</p>	<p><b>Noted</b></p>

	<p><b>Improvement Plan, are also taken into account.</b></p> <p>Strategic Transport Assessment</p> <p><b>The Strategic Transport Assessment of the Chichester Local Plan, adopted in July 2015, tested the cumulative impact of strategic development proposed within the Chichester District. The Strategic Transport Assessment identified the additional travel demand as a result of planned development, over and above development already committed plus background growth. The County Council worked collaboratively with Chichester District Council to inform the Strategic Transport Assessment and on the basis of continuous review of the work carried out, supports its conclusions.</b></p> <p><b>The Strategic Transport Assessment of Strategic Development Options identified the impact of the Strategic Development Locations on the highway network through a robust transport modelling exercise using the Chichester Area Transport Model (CATM). The study methodology was agreed by the County Council and the Highways England.</b></p> <p><b>The Strategic Transport Assessment identifies a package of mitigation measures consisting of improvements to junctions on the Chichester Bypass section of the A27 and smarter choices measures to encourage the use of sustainable modes of transport. The study demonstrates that this package of mitigation measures is sufficient to accommodate the levels of development proposed within the Chichester Local Plan.</b></p> <p><b>The purpose of the Strategic Transport Assessment was to undertake an assessment of the transport implications of development proposed by the Chichester Local Plan on the highway network, identify the impacts and appropriate and feasible mitigation. Mitigation measures have then been included in the Infrastructure Delivery Plan that accompanies the Chichester Local Plan.</b></p> <p><b>The Strategic Transport Assessment took account of the sites allocated in the Chichester Local Plan and included a forecast estimate of background traffic growth.</b></p> <p><b>In considering the Neighbourhood Plan Review for Loxwood, the size and location of proposed site allocations have been taken into account when considering if further transport evidence is required at this stage.</b></p> <p><b>The overall level of development proposed in the Loxwood Neighbourhood Plan Review is not in accordance with the forecasts of proposed development and generated traffic assumed in the Strategic Transport Assessment. However, it is accounted for in the Chichester Transport Study work undertaken to date for the</b></p>	
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		<p>current Local Plan review. This was published in December 2018 on the District Council's website. The developer would need to contribute proportionally to improvements in the area that provides mitigation to the proposed development. It is considered that no further transport study work is required to demonstrate that the development could not proceed without a severe cumulative impact under the NPPF. A full transport assessment will continue to be required to support any planning application.</p> <p>The Strategic Transport Assessment indicates that over the plan period, traffic conditions in some locations are likely to worsen due to the effects of background traffic growth. If not addressed through improvements to the highway network, this could exacerbate existing congestion issues, or lead to congestion in previously uncongested locations. Therefore, as development takes place there will be a need for improvements and / or financial contributions to be secured towards the delivery of these improvements.</p> <p>The County Council have no overriding concerns about the transport impacts of the Loxwood Neighbourhood Plan Review. However, given that the pre-submission Neighbourhood Plan Review for Loxwood includes the proposed allocation of small scale housing sites, it should be noted that site specific matters in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on site specific matters at this stage. In considering site specific matters, please refer to the attached Development Management guidance.</p> <p>The County Council currently operates a scheme of charging for highways and transport pre-application advice to enable this service to be provided to a consistent and high standard. Please find further information on our charging procedure through the following link:</p> <p><a href="http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/preapplication_charging_guide.aspx">http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/preapplication_charging_guide.aspx</a></p> <p>Minerals and Waste</p> <p>The <a href="#">West Sussex Waste Local Plan 2014 (WLP)</a> and the <a href="#">West Sussex Joint Minerals Local Plan 2018 (JMLP)</a> form part of the development plan for Loxwood as well as the Chichester Local Plan, and as such are relevant to the Loxwood Neighbourhood</p>	
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		<p><b>Plan Review.</b>          The Parish is partly underlain by brick clay which is a safeguarded resource under Policy M9 of the JMLP. Development within the parish could be subject to a minerals or waste resource assessment to ensure that viable mineral resources are not permanently sterilised in accordance with the thresholds outlined in the <a href="#">Minerals and Waste Safeguarding Guidance</a>. The Parish Council may wish to consider this in respect of the proposed Neighbourhood Plan.          Throughout the document, reference is made to the Traffic Calming Policy as Policy 16, when it is now Policy 20. The document should be checked for this and amended.  <i>Paragraph 6.3a</i>          Loxwood Infant and Junior Schools are now known as Loxwood Primary School. It is recommended that the document reference the most up to date <a href="#">Planning School Places</a> document when referencing figures. We request the following changes to the paragraph:  <del>Infant and Junior</del> <b>Loxwood Primary</b> School - consisting of 7 classes for age ranges 4 to 11 years, with a net capacity of 210 students. Occupancy level as at September 2019 was <b>83%</b> <del>84%</del>. Most of the school buildings are of 1950's construction, <del>built for a 25-year usage</del>. The buildings are now showing their age and are past their intended life span. New facades have been fitted, the roof has been renewed, however there are more areas in need of refurbishment and repair. The buildings have been extended to their maximum capacity <b>of 210 places</b> <del>and</del> <b>but</b> there is <del>little</del> <b>some</b> room for expansion. The car park is <del>too</del> small for the amount of staff in the building.</p> <p>Infrastructure Priorities          As Chichester District Council is a CIL authority, it is suggested that the Local Plan Review could further look into projects which the Parish Council could spend their proportion of CIL money on. This could be in the form of an appendix at the back of the plan which could be updated when needed. This could include measures to prevent surface water flooding, or identifying potential new sustainable transport measures for the area such as upgrades to the Public Right of Way network to reduce reliance on the private vehicle.</p>	<p><b>Agreed</b> - -References corrected</p> <p><b>Agreed</b>-Text changed</p> <p><b>Agreed</b>-Text Changed</p> <p><b>Noted- This comment is aimed at the CDC LPR.</b>          Loxwood Parish Council submits to CDC its proposed CIL spending plans each year in the form of the Business Infrastructure Plan.</p>
	<p>Historic England</p>	<p><b>Sustainability Appraisal (incorporating Strategic Environmental Assessment and Historic Environment Report)</b></p>	<p><b>Partially Agreed</b> – The detail for the assessment of impact and harm is included in</p>

		<p>It is unclear how the assessments of impact and harm which are included within the Sustainability Appraisal have been made, especially in relation to the historic environment. The report does not show why it is considered that there will be no effect or a neutral effect on heritage assets in a number of site locations. As a result, the assessments are not sufficiently clear or justified to a level acceptable to inform the Plan. This is a serious potential point of failure that could, potentially, mean the plan is found not to meet the basic conditions. We have seen Neighbourhood Plans challenged on these grounds and urge you to consider how you will ensure the assessment of impacts on heritage assets and the measures considered to mitigate them is documented.</p> <p><b>Inclusion of an Historic Environment Objective</b></p> <p><b>Recommendation:</b> Include an additional objective relating specifically to the conservation and enhancement of the historic environment and the protection of significant heritage assets (both designated and non-designated).</p> <p>The objectives set out in the Plan are clear and relevant. It is noted, however, that there is no specific mention of the historic environment in either the overall vision or objectives. As made clear in the Plan text, the objectives are used to define the policies within the Plan. The omission of an historic environment objective is reflective of the lack of a policy concerning the conservation and enhancement of significant heritage assets (both designated and non-designated) within the settlement boundary.</p> <p><b>Inclusion of an Historic Environment Policy</b></p> <p><b>Recommendation:</b> Include an additional policy relating specifically to the conservation and enhancement of the historic environment, with particular attention paid to the protection of locally listed and non-designated assets.</p> <p>Section 8 on Heritage Assets details the presence of listed buildings within the village boundary and states that the Plan will seek to protect the village’s built heritage. Non-designated heritage assets are mentioned, along with the contribution these make to the character and historic interest of the parish. Also referenced are ‘important spaces’ which provide the essential atmosphere of the village. It is suggested that the Plan seeks to protect its heritage assets, in order to ensure their character is not destroyed by inappropriate development.</p>	<p>Section 11 (Appraisal of policy options) of the SEA. Notwithstanding, detail has been added to section 12 (Appraising the Policies).</p> <p><b>Agreed--</b> A historic environment objective has been added.</p> <p><b>Disagree -</b> . Although the NP does not have a designated historic environment policy, historic buildings are addressed in policies 7 (d), 14(i) and 17 9d)</p> <p><b>Agree -</b> The location of listed buildings is given on the Historic England web site as detailed in</p>
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	<p>Nevertheless, it is unclear from this section, and subsequently throughout the remainder of the Plan, exactly which sites are considered to have historic value and how this has been assessed. This information is needed in order to inform the Plan, as per the Government’s National Planning Practice Guidance on the Historic Environment. This states that it is beneficial for any designated and non-designated heritage assets within the plan area to be clearly identified, so they can be appropriately taken into account (paragraph 5). The inclusion of a policy on the conservation and enhancement of the historic environment would enable the Plan to ensure the necessary level of protection is afforded to assets with identified heritage significance. It would also allow the Plan to clearly establish its approach to and awareness of the importance of locally listed assets and the contribution that these make to the overall character of the village.</p> <p>Historic England recommends that this additional policy be included alongside the extant policies on designated local green space (policy 10) and environmental characteristics (policy</p> <p>Section 7 As well as setting out Loxwood’s key landscape characteristics, this section also touches on elements of the historic environment. As a result, Historic England suggests that this section should be combined with Section 8 on Heritage Assets and renamed as “The Natural and Historic Environment” in order to reflect this. This would also be an appropriate section to locate the suggested addition of a policy related specifically to the historic environment.</p> <p>Sites Considered but Rejected The Sustainability Appraisal sets out the additional sites that were also considered for development but were found to be unsuitable or undesirable. These include:</p> <ul style="list-style-type: none"> <li>• Hawthorn Cottage</li> <li>• Woolspinners</li> <li>• The Wharf</li> <li>• Orchard House</li> </ul> <p>It is unclear in the Sustainability Appraisal or its appendices where the Hawthorn Cottage and Orchard House sites are located. Historic England is therefore unable to advise on whether these sites would have a less detrimental impact of the historic environment than those</p>	<p>para. 8.1 of the NP. In addition, the location of the listed buildings, the non-designated buildings and assets , open spaces and outlooks, are listed in appendix 2.of the NP. The exact location of these designations are depicted on Maps one and two in the Village Design Statement (VDS). These have now been added to Appendix 2 with cross references to the VDS. The VDS can also be found on the parish web site and forms part of the evidence base for the current Made NP. Paragraph 8 of the NP has been amended to provide a link to the parish council web site.</p> <p><b>Disagree</b> - This section addresses the Natural Environment and is taken from the CDC Landscape Capacity report. It is important to keep the historic environment and landscape environment separate in order to ensure clarity. Paragraph 8 addresses Heritage Assets.</p> <p><b>Disagree</b> – Sites not allocated are academic with respect to their impact on Heritage assets</p>
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	<p>allocated in the Plan.</p> <p>The Woolspinners site is located next to the plot occupied by the locally listed Black Hall. Historic England therefore considers that building on this site would have a similar effect of serving to enclose Black Hall in development and removing what is left of its green setting. Any development at The Wharf would be subject to the same issues facing the development of the Land South of Loxwood Farm Place, with the addition of causing harm to the setting and vistas of the Wey and Arun Canal.</p> <p><b>Appendices</b></p> <p>Throughout the Plan, the reader is directed to the two appendices for further information and clarity. Appendix 1 provides a ‘Neighbourhood Plan Allocated Site Map’ and appendix 2 intends to give details of Loxwood’s buildings, setting and spaces with heritage significance. A full understanding of a number of the policies depends on information provided by these appendices.</p> <p>The map provided in appendix 1, however, does not include all of the allocated sites set out in the Plan. As a result, the map is less helpful than it should be and does not provide a complete picture of the sites allocated for development. The ability to use this map to better understand the impact of combined development is reduced.</p> <p>It is also unclear how the information provided in appendix 2 is useful or how this should be applied to the policies set out in the main body of the Plan. Little information is given about the significance of the assets listed and, without a corresponding map showing the locations of the buildings, settings and spaces concerned, understanding of the impact of the proposed development upon them is minimal. The value of local listing is largely reliant on the information provided to decision makers about why assets have been included on the list.</p> <p>As such, we recommend giving further attention to this section. Our published advice on the local listing of heritage assets may be of value to the steering group (<a href="https://historicengland.org.uk/listing/what-is-designation/local/local-designations/">https://historicengland.org.uk/listing/what-is-designation/local/local-designations/</a>).</p>	<p><b>Disagree</b> – See above comment.</p> <p><b>Noted</b> - Map of sites added to Appendix 6 of SEA.</p> <p><b>Noted</b> – However Appendix 3 has been added to include maps of all sites put forward for consideration from the Call For Sites including those sites carried forward from the original NP.</p>
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		<p>We would urge you to address the recommendations and advice set out in this letter and to use it to inform further revisions of the draft Loxwood Neighbourhood Plan. If you would like clarity on any of our recommendations or advice please contact us</p>	
	<p>CDC</p>	<p><b>Process:</b>  It is not clear what, if any, arrangements the Parish Council has made in terms of the public consultation in relation to the government advice previously, drawn to its attention, concerning the coronavirus pandemic and neighbourhood plans.  <a href="https://www.gov.uk/guidance/neighbourhood-planning--2">https://www.gov.uk/guidance/neighbourhood-planning--2</a>  There is no indication on the PC website that anyone can do more than email their comments to the PC. There is no indication as to whether hard copies of the various documents have been made available on request etc., that comments in writing will also be accepted by the PC or what alternatives may be possible. It is therefore not clear there is sufficient evidence that the PC can demonstrate that all groups in the community have been sufficiently engaged in this stage in the formal process. Depending on what evidence the PC can provide to CDC to show how the guidance has been met, it may therefore be necessary for the PC to undertake a repeat regulation 14 consultation.  <b>General:</b>  Concern has been, and continues to be, expressed by Chichester District Council (CDC) in relation to the timing of this consultation. As yet the overall development strategy for the Local Plan Review (LPR) has not been considered and agreed. In that respect, and as advised previously, there may well be a need for the Parish Council (PC) to undertake a repeat regulation 14 consultation in due course once final numbers for the submission version of the LPR are agreed. This will potentially require the PC to undertake further work including with the wider local community prior to redrafting of the draft NP, along with the Strategic Environment Assessment (SEA) work to date, and to review other relevant evidence that supports the proposals in the draft plan. As a related point, the potential need for Habitats Regulations Assessment (HRA) work should be kept under review, particularly if the Neighbourhood Plan precedes the adoption of the Local Plan Review</p>	<p><b>Accepted</b> – The NP has been amended to include a definition of the consultation methodology and details of all consultation activities.</p> <p><b>Noted</b> – CDC in their Chichester Local Plan Review 2019 -2035- Preferred Approach published on 19<sup>th</sup> December 2018 allocate 125 additional houses to the Parish of Loxwood. Given that CSC now cannot demonstrate a 5-year housing land supply, Loxwood NPSG have no alternative but to progress its NP as soon as possible in order to limit the amount of uncontrolled development that is already</p>

		<p>Reference to the plan period should be amended in the title of the plan and throughout the document to 2037 rather than 2035. Housing figures should be expressed as minimum figures in policy allocations.</p> <p>There is need for some general updating in terms of document references, for example the new Local Plan is the Chichester Local Plan Review (LPR), and also for some updating of previous text in relation to changes since July 2015, for example to the GPDO and use classes order.</p> <p>It would be helpful for ease of reference if the title of each policy could be included with the policy number as the section heading is often several pages from the policy itself. Many policies refer to certain 'conditions' to be met; this is more applicable to a planning application, for policies the word 'require' would be more appropriate.</p> <p>There is no clear policies map in the document although there is map identifying proposed allocated sites in Appendix 1. However, this does not include the site at Farm Close carried</p>	<p>taking place within the parish. National Planning Guidance in para 009 reference id 41-009-20190509 addresses the situation where a NP can come forward in advance of an up to date Local Plan is in place. It allows a neighbourhood plan body to request an indicative housing figure from the LPA which will need to be tested at examination. CDC have now written to all parishes detailing the final housing allocations and Loxwood has been allocated 125 houses as per the allocation in the NP</p> <p><b>Noted</b> – Plan period changed to 2037</p> <p><b>Agree.</b> The NP has been amended to reflect the term Local plan Review and the GDPO</p> <p><b>Agreed</b> – Policies numbered accordingly</p> <p><b>Agreed</b> – Where applicable the word require has been used</p> <p><b>Agreed-</b> Policies Map has been include in appendix 1 and includes the Farm Close site</p> <p><b>Noted-</b> Numbering retained for continuity</p> <p><b>Disagree</b> – The policy on Sewerage and Surface Water will be split into two separate policies</p>
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	<p>through from the previous plan or the commercial part of Nursery Green. In addition the numbering of the sites is related more to the site assessment references than a logical numbering of the sites, suggest this is amended.</p> <p>Further consideration should be given to what maps are required and what a policies map should show. Equally Figures 14 and 15 relating to flooding information may be better located in their own appendix rather than in isolation at the end of the plan.</p> <p>Page 7: para 1.3 – Line 11 – reference should be to ‘the plan area’ rather than ‘throughout the district’.</p> <p>Section 2 – Background - suggest this needs some updating as it does not relate to work that the revised plan is built on. If it is to be retained than suggest it is summarised.</p> <p>Page 10: Section 4 – Referendum: This implies that the referendum may not be necessary or potentially held which is incorrect; suggest some minor re-wording.</p> <p>Section 5: Vision and Objectives: needs some revisiting as it is not clear of this has been tested for the revised plan and is still valid. Similarly it is not clear if the objectives remain relevant as this section is related to 2013-2029.</p> <p>7)</p> <p>Page 11: para 6.1 (b) – reference should be to ‘CDC’s Local Pan Review’</p>	<p>and mapping allocated as appropriate and the maps retained with the respective policies.</p> <p><b>Agreed</b> The text has been changed</p> <p><b>Disagree</b> – The background details the work done to establish the original NP and such this should be retained. This is a revised plan and incorporates the original Plan and as such is not a new Plan</p> <p><b>Agreed-</b> The text referring to the referendum has been changed to explain more fully government guidance</p> <p><b>Agreed</b> – additional text input made to ratify the vision and objectives for the Revised NP</p> <p><b>Agreed</b> -The text throughout the NP has been amended</p> <p><b>Agreed</b> – The NP has been amended accordingly</p> <p><b>Disagree</b> – Site numbering will be retained in order to align with the Questionnaire numbering references</p> <p><b>Agreed</b> – NP changed</p> <p><b>Disagree</b> – The background details the work done to establish the original NP and such this should be retained. This is a revised plan and incorporates the original Plan and as such is not a new Plan.</p>
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			<p><b>Agreed</b> – Text has been modified</p> <p><b>Agreed</b> – additional text input to ratify objectives for the Revised NP</p> <p><b>Disagree</b> – CDC’s Local Plan Review is not policy yet</p>
	<p>CDC</p>	<p><b>Page 16: Section 7 The Natural Environment</b> – no mention is made of the CDC Landscape Study (March 2019). A link to the evidence page for the LPR is below and the document is reference 007. It may be helpful to consider this study in the context of the revised NP. <a href="https://www.chichester.gov.uk/article/30928/Supporting-evidence---Local-Plan-review">https://www.chichester.gov.uk/article/30928/Supporting-evidence---Local-Plan-review</a></p> <p><b>Page 21: para 11.8</b> – the information is inconsistent with that on Page 11 in para 6.1 (h). Suggest some minor updating.</p> <p><b>Page 25: Affordable Housing</b>  <b>Para 15.4</b> - This paragraph indicates that the CDC Housing and Economic Development Needs Assessment (HEDNA) 2018 require 30% affordable housing which is incorrect. The HEDNA 2018 actually recommends the provision of 35% affordable housing on new marketled developments. It is Chichester Local Plan: Key Policies 2014-2019 (CLPKP) Policy 34 which requires that 30% affordable housing be delivered. It should also be made clear that 30% housing will be sought onsite on schemes delivering a net increase of 11 or more units.  On schemes of 6 to 10 dwellings in in rural designated areas under Section 157 of the Housing Act 1985 (which Loxwood is), an affordable housing financial contribution would be sought, calculated in accordance with the Planning Obligations and Affordable Housing SPD. As CDC is currently in a transitional period between local plans and the affordable housing percentage is still being decided, it may be more appropriate to say a policy percentage level of affordable housing compliant with CLPKP Policy 34 or any amending or successor policies.</p>	<p><b>Agreed</b> – Text for section 7 – The Natural Environment has been updated to reflect the conclusion for the CDC Landscape Study (March 2019)</p> <p><b>Disagree</b> – Should refer to para 11.9 and this is not inconsistent with para 6.1</p> <p><b>Disagree</b> – The 2020 HEDNA does not specify any affordable housing percentage. Para 15.4 amended to reflect the affordable housing elements</p>

	CDC	<p>Comments on Strategic Environmental Assessment</p> <ul style="list-style-type: none"> <li>• A map of sites should be included</li> <li>• Policy names should be included in Section 12</li> <li>• Neutral impacts should be clarified</li> </ul>	<b>Noted</b> – SEA updated accordingly
	Seaward Properties Ltd. (Smith Simmons Partnership)	<p><b>Loxwood Revised Neighbourhood Development Plan 2019-2035 Regulation 14 Pre-Submission Consultation - Land at The Wharf Loxwood</b></p> <p><b>Introduction and Scope of Representations</b>  <b>These representations have been prepared on behalf of Seaward Properties Ltd. The company has agreed a controlling interest in 1.75 ha of land at The Wharf Loxwood with the owners Mr K and Mrs M Overington.</b></p> <p><b>The extent of the land is shown on the attached location plan edged red.</b>  <b>In summary, our comments deal with the ‘basic conditions’ for Neighbourhood Plan preparation and propose the inclusion of land at the Wharf as an additional baseline housing allocation for at least 22 dwellings and retained land for a wildlife corridor in the Submission version Loxwood Neighbourhood Plan.</b></p> <p><b>Planning Background</b>  <b>In 2018, the Chichester Local Plan Review was published for public consultation. At this ‘pre submission’ stage, Policy S5 allocated Loxwood parish for a draft allocation of 125 dwellings for the period to 2035. Although the allocation has not been confirmed and the housing distribution is subject to revision in the next Submission Local Plan, the parish nevertheless embarked on its Neighbourhood Plan Review, principally to identify new sites for the 125 dwellings.</b></p> <p><b>My clients land at the Wharf was proposed as a residential allocation at the Site Questionnaire stage of the Neighbourhood Plan Review in June 2020 (Ref Site 7) for 22 dwellings. At this time, the development area for the 22 dwellings was confined to land of less than 1ha with around 0.8ha included as a retained wildlife corridor. It was shortlisted as 1 of 8 sites by the Loxwood Neighbourhood Plan Steering Group as being viable, sustainable and policy compliant.</b></p>	<b>Disagree</b> – See response in appendix 1 on this document.

	<p>In October 2020, the Wharf was included as a deliverable housing site in Chichester District Council’s own Housing &amp; Economic Land Availability Assessment (HELAA). The Wharf (along with other land on the west side of Loxwood was included as a deliverable opportunity under site ref HLX0016. The entire site capacity in the HELAA Site Assessment was given as 1000 dwellings.</p> <p><b>The Loxwood Neighbourhood Plan Review</b>          After the Site Questionnaire stage of the Loxwood Neighbourhood Plan Review in June 2020, local people were given the opportunity to select their own site preferences in a resident’s questionnaire. They chose not to include the Wharf as an allocation. They did however select adjoining land South of Farm Place as an allocated site. We now see that the draft Neighbourhood Plan Pre Submission Version has allocated 4 residential sites to meet the 125 dwelling parish allocation. The sites comprise land west of Guildford Road (50 dwellings), land South of Farm Place (24 dwellings), land at Loxwood House (30 dwellings) and land to the rear of Blackhall (22 dwellings), a total of 126 dwellings. The land west of Guildford Road and south of Farm Place providing 74 dwellings already have planning permission. Two other sites including land to the rear of Blackhall are also the subject of planning applications for another 35 dwellings, a total of 109 dwellings.</p> <p><b>Comments on the Loxwood Neighbourhood Plan Review</b>          These comments on the Pre-Submission Regulation 14 Draft Loxwood Neighbourhood Plan deal with the ‘Basic Conditions’ for Neighbourhood Plan preparation. In summary, our view is the Plan as it stands, does not meet the ‘basic conditions’ for Neighbourhood Plan preparation as it has failed to:</p> <ul style="list-style-type: none"> <li>i) Have proper regard to national policies and advice in terms of Neighbourhood Plan preparation, and ii)</li> <li>ii) Is not in general conformity with the strategic policies of the development plan for the area</li> </ul> <p>It has failed test i) because, in including sites as Plan allocations which already have planning permission, it is in conflict with national policy in the on-line Planning Practice Guidance. Including sites which were granted permission to help address a 5 year land supply shortfall against an existing requirement means the Neighbourhood Plan will not be providing sufficient houses to meet a future housing requirement.</p> <p>Second, it has failed test i) because national policy in the NPPF (paragraph 68 and 69) recommends that in revising Neighbourhood Plans, more small and medium sized sites of</p>	
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		<p>less than 1 ha should be identified to meet its housing needs. However, only 1 of the allocated sites in the draft Plan (land to the rear of Blackhall) is less than 1ha and is the subject of a planning application anyway to help meet a pre-existing land supply shortfall. There are no other new sites of less than 1ha in the Neighbourhood Plan. The inclusion of the Wharf as a new baseline site having a developable area of less than 1ha (excluding the wildlife corridor and retained open meadow within the flood zone) would however bring the Plan more in line with this national policy objective.</p> <p>Third, it has failed test i) because the weighting criteria used in the Strategic Environmental Assessment to inform the site selection process has been used inconsistently and in our view, unfairly resulted in the Wharf being ranked as a non-preferred site in the options appraisal. It has failed test ii) because the Neighbourhood Plan has not identified sufficient sites to meet the draft future housing requirements for the parish. Should the housing distribution for Loxwood be revised upwards in the next Submission Local Plan then this position will only worsen. The Neighbourhood Plan cannot therefore be said to be in general conformity with the overarching strategic policies of the Local Plan.</p> <p>We are therefore obliged to oppose the Plan as currently drafted. However, its failure to meet the above basic conditions can easily be remedied by including additional baseline sites to meet the full 125 dwelling requirement and other possible contingency sites should the dwelling requirement be increased above 125 dwellings when the next Submission Local Plan Review is published by the District Council in Spring 2021.</p> <p>We propose that the next Submission Neighbourhood Plan is revised to include land at the Wharf as one of the additional baseline housing allocations.</p> <p><b>Basic Conditions for Neighbourhood Plan Preparation</b></p> <p>Paragraph 8(2) of Schedule 4B of the 1990 Town and Country Planning Act sets out the basic conditions a Neighbourhood Plan must meet and which an examiner must consider before it can go to referendum. The statutory test is:</p> <ul style="list-style-type: none"> <li>• Having regard to national policies and advice, whether it is appropriate for the Neighbourhood Plan to be made</li> <li>• Having special regard to the desirability of preserving any listed building or its setting or the character or appearance of any Conservation Area</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Contribute to the achievement of sustainable development</li> <li>• Be in general conformity with the strategic policies of the development plan for the area</li> <li>• Be compatible with the European Union (EU) and European convention on human rights (ECHR) obligations</li> </ul> <p><b>Test 1 - Has the Plan Paid Regard to National Policy in the NPPF?</b></p> <p>We do not believe the draft Loxwood Neighbourhood Plan has paid regard to National Policy in terms of meeting its housing requirements. The NPPF (paragraph 29) says Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies. The online Planning Practice Guidance Paragraph: 103 Reference ID: 41-103-20190509 says neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. Paragraph: 009 Reference ID: 41-009-20190509 says Neighbourhood Plans should allocate reserve sites to ensure that emerging evidence of housing need is addressed.</p> <p>The adopted Key Policies Local Plan made provision for a housing requirement of 435dpa across Chichester District. However, because that Plan became more than 5 years old in July 2020, a new housing target applies after this date. The new housing target is derived from the Government’s standard methodology for assessing housing need. From the 15 July 2020, the Council’s housing need is 628 dwellings per annum. This higher housing need figure has resulted in Chichester District having a 5 year land supply shortfall. To remedy this shortfall the Council has issued an Interim Policy Statement on Housing (IHP) and has led to additional sites being granted planning consent. Land at west of Guildford Road and south of Farm Place Loxwood providing 74 dwellings have been granted planning consent in accordance with this policy. Other applications for a further 35 dwellings on land to the rear of Blackhall Loxwood are pending decisions in accordance with the IHP. A total of 109 dwellings are therefore proposed to come forward in accordance with the IHP to help meet a current housing requirement shortfall. However, the same sites at Loxwood are all allocated in the draft Neighbourhood Plan to a meet a future housing requirement. The same sites cannot meet both a current and future housing requirement. In short, the Neighbourhood Plan is therefore underproviding against the future housing requirement by at least 109 dwellings. Future baseline sites will need to be allocated at Submission stage to meet this shortfall. If the current draft parish total of 125 dwellings is revised</p>	
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	<p>upwards in the next Submission Local Plan, then more sites still will be needed. In this eventuality we suggest the draft Neighbourhood Plan makes further allocations as a series of possible contingency sites</p> <p>. The additional baseline and contingency sites should be identified paying regard to paragraph 68 and 69 of the NPPF to include at least 10% of its housing requirement on sites of less than 1 ha.</p> <p>We would point out that the developable part of land at the Wharf, proposed for 22 dwellings is less than 1ha.</p> <p>The additional sites also need to pay regard to the Strategic Environmental Appraisal (SEA) forming part of the evidence base for the Neighbourhood Plan, particularly the weighting criteria used to inform the site selection process.</p> <p>The SEA appraised the 8 shortlisted Neighbourhood Plan sites identified in June 2020. The sites were evaluated against 5 tests, namely whether they would have:</p> <ul style="list-style-type: none"> <li>• Likely significant positive effect</li> <li>• Likely positive effect</li> <li>• No likely effect/neutral effect</li> <li>• Likely negative effect, or</li> <li>• Likely significant negative effect.</li> </ul> <p>With regards to the performance criteria, Land at The Wharf scored a likely significant positive effect in meeting housing need and a neutral impact on the other criteria save for a likely negative effect on the objective of protecting the character, qualities and identity of the landscape. This caused it to be assessed as a non-preferred option.</p> <p>However, this assessment was carried out before the adjacent land south of Farm Place was granted planning permission. This consent will mean any landscape impact at the Wharf will be diluted in views from the south because its development will be viewed against the backcloth of new houses. The Wharf was also discounted on this point because (paragraph 11.14 of the SEA) it was</p> <p>‘likely to have an adverse (but not significant) impact on the natural environment objective. The same is the case for land West of Guildford Road primarily due to its scale, the openness of the site and its potential visibility in wider views. It is however acknowledged that this site has planning permission’.</p>	
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		<p>In summary therefore, it performed no worse than a site already granted permission in the scoring matrix and since then land immediately adjacent to it has been granted planning permission as well. The whole context for the earlier landscape assessment in the SEA is therefore now out of date</p> <p>. We therefore believe that land at the Wharf should be allocated as a new baseline allocation for 22 dwellings. It will deliver additional housing on a developable area of less than 1ha. It would be located in a part of Loxwood already considered suitable for new housing in recent planning permissions and its landscape impact would be no worse than already permitted sites.</p> <p>Test 2 - Has the Plan been prepared in general conformity with the strategic policies of the Development Plan for the area?</p> <p>The draft Neighbourhood Plan has failed test ii) because it has not identified sufficient sites to meet the draft future housing requirements for the parish currently set at 125 dwellings. Most of the allocated sites have already been granted permission to meet a land a supply shortfall against an existing housing requirement. They cannot also contribute to a future housing requirement. Should the housing distribution for Loxwood be revised upwards in the next Submission Local Plan then this position will only worsen. The Neighbourhood Plan cannot therefore be said to be in general conformity with the overarching strategic policies of the Local Plan.</p> <p><b>Mending the Plan with Additional Housing Allocations</b></p> <p>To mend the Loxwood Neighbourhood Plan to bring it 1) more in line with national policy and 2) the strategic policies of the Chichester District Local Plan review, we propose the addition of land at the Wharf as a new Policy allocation:</p> <p><b>Policy X – Allocation of Land at the Wharf Loxwood for at least 22 dwellings to include a mix of house types reflecting local and at least 30% of the dwellings to be affordable. The site should include an area of land shown as a retained wildlife corridor on its southern boundary adjoining the Canal.</b></p>	
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**Smith Simmons and Partners Response**

**Land at The Wharf, Loxwood**

**James Garside Planning Ltd.**

A submission has been received by Smith Simmons and Partners (SSP) stating that the Loxwood Neighbourhood Plan (Review) does not meet the following basic conditions as it has failed to:

- i) Have proper regard to national policies and advice in terms of Neighbourhood Plan preparation, and*
- ii) Is not in general conformity with the strategic policies of the development plan for the area*

The individual points raised will be addressed below.

Basic Condition (i)

- 1) The submission from SSP suggests that the Plan fails to meet basic condition (i) (see above) on the basis that sites already granted planning permission to meet an ‘existing’ housing need should not be allocated within the Neighbourhood Plan or count towards the parish housing requirement which is intended to meet a ‘future’ housing need.**

Response:

- (a) The distinction between ‘existing’ and ‘future’ housing requirement is misleading as, in line with National Planning Practice Guidance<sup>1</sup>, both the 5 year supply calculation (against which the various sites were effectively granted planning permission) and the Local Plan Review housing requirement (which currently identifies a housing requirement of 125 for the parish) are based/calculated on the district’s objectively assessed housing need (calculated using the standard methodology) of 628 dwellings per annum. It is important to note that the Local Plan period covers 2017 to 2039 and, given the various sites were granted planning permission within this plan period, it is misleading (and a form of double counting) to make a distinction between ‘existing’ and ‘future’ housing need. Essentially, the sites granted planning permission are making a contribution towards the district’s housing need and thus the housing requirement for both the district and parish set in S5 of the Local Plan.
- (b) There is no guarantee that the sites with planning permission, or outline permission, will be implemented, hence the need to allocate through the NP to provide certainty of delivery over the plan period.

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<sup>11</sup> NPPG - Paragraph: 001 Reference ID: 68-001-20190722

- (c) Chichester District Council has confirmed their support for the inclusion of sites with outline or full planning permission as allocations within the Neighbourhood Plan and have not raised any specific concerns about the site allocations meeting the current housing requirement for the parish (125 dwellings over the plan period) in their formal response.

**2) The submission by SSP also claims that the plan fails to meet basic condition (i) as para's 68 and 69 of the NPPF advises Neighbourhood Plans to include more small and medium sized sites of less than 1 ha in meeting its housing need.**

Response:

- (a) Whilst paragraph 68 does indeed include a requirement for Local Planning Authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, paragraph 69 states that "*neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites suitable for housing in their area*". As such, there is no requirement for neighbourhood planning groups to identify at least 10% of their housing requirement on small sites. Notwithstanding, as set out in the Neighbourhood Plan and supporting site assessment information, a robust approach to site assessment has been undertaken considering sites of all sizes and types and it is also noted that the amendment to the settlement boundary has also reflected this aspiration as the smaller sites considered have been included within the revised settlement boundary.
- (b) The Wharf site is over 1 ha in size (including the non-developable area).

**3) The submission states that the Neighbourhood Plan does not have regard to basic condition (i) on the basis that weighting criteria used in the Strategic Environmental Assessment to inform the site selection process has been used inconsistently and unfairly resulted in the Wharf being ranked as a non-preferred site in the options appraisal.**

Response:

- (a) The Strategic Environmental Assessment did not identify the Wharf as a preferred option as development of the site was considered likely to result in environmental harm due to its location and the attractive rural character and landscape setting of this part of the village. This assessment was based on an objective assessment of the site by an independent planning consultant and it should also be noted that the Strategic Environmental Assessment is only one part of the Neighbourhood Plan evidence base upon which sites were chosen.

Basic Condition (ii)

- 4) The submission by Smith Simoon and Partners states that the Neighbourhood Plan is not in general conformity with the strategic policies of the development plan on the basis that it has not allocated sufficient sites to meet the draft future housing requirements for the parish.**

Response:

(a) The Neighbourhood Plan is required to be in general conformity with the strategic policies of the adopted Local Plan (Key Policies 2014-2029). Notwithstanding, the Neighbourhood Plan is primarily being reviewed to align with the emerging Local Plan. Due to significant delays to the Local Plan process, the Neighbourhood Plan Steering Group made a decision to proceed with the Regulation 14 consultation, identifying sufficient sites to meet the parish housing requirement set in the Preferred Approach Local Plan. If the housing requirement for the parish increases in future iterations of the Local Plan then it is expected that the Neighbourhood Plan will be revised accordingly and the necessary steps taken to re-consult in line with the Neighbourhood Planning Regulations.

Responses to other points raised relating to the Strategic Environmental Assessment:

1. To clarify, the Wharf scored a 'positive' effect against the housing objective (not 'significant positive' effect) in the Strategic Environmental Assessment
2. The submission by SSP questions the assessment of the Wharf site through the SEA on the basis that it does not factor in that the adjacent site at Loxwood Farm Place has been granted planning permission and that the Wharf site will be viewed in this context, with a comparison being made to the Land at Guildford Road.
  - a. Firstly, the SEA, which was undertaken by an independent planning consultant and forms only one part of the Neighbourhood Plan evidence base, is an objective assessment and each site has been assessed against the sustainability framework on its own merits (albeit cumulative impacts have been considered where applicable). Consistency of scoring has been ensured but a simplistic comparison of sites and scoring is not appropriate (with the full detail for each site assessment found in Section 11 of the SEA). Land South of Loxwood Farm Place has been granted outline planning consent and this was a known factor considered through the assessment.
3. The Strategic Environmental Assessment will be reviewed prior to its final publication alongside the Regulation 15 version of the Neighbourhood Plan and this review will factor in any material changes to the 'reasonable alternatives' or the policies appraised.