



# Loxwood Parish Council

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Consideration of increased housing numbers for the northern part of the Chichester Local Plan Area.

## **Scale of Growth**

Loxwood Parish Council recognises the need for further housing development and the made Neighbourhood Plan allocated 2 sites (60 houses) for development. Working towards estimated housing numbers supplied by CDC Loxwood's Regulation 14 Neighbourhood Plan allocates a further 4 sites (125 houses). With currently approximately 734 households this represents nearly a 25% increase in number of households from making the original Neighbourhood Plan. Loxwood welcome the manageable scale of growth that this represents to support the facilities of the local community; the local school, shops and pub. However, growth at the significant scale represented by the table contained in Officer Toby Ayling's letter of 19<sup>th</sup> January 2022 cannot be said to be sustainable for the following reasons.

### **Lack of facilities**

Loxwood has a small local shop that threatens to close reducing further the amenities for the village. A new shop is not a given at the moment.

### **Lack of Infrastructure to Support Large Scale Growth**

The Parish has struggled to cope with the growth that has occurred in the Parish over the last few years. Surface water runoff down the B2133; sewerage being tankered away; and frequent power cuts manifest this. The high scale of growth being considered cannot be sustained by the present infrastructure.

### **Lack of Water Supply**

Loxwood Parish and the NE villages are in the Hardham water supply area. The damage to habitats from over abstraction of water above licenced amounts, should create a situation where housing development numbers may be reduced from the standard method of calculation for Chichester District and this reduction should be passed on to the NE Parishes.

### **Lack of Water Drainage**

Southern Water (SW) have failed to keep abreast with the increases in demand on the sewerage infrastructure capacity that recent housing development has created, not only this, they have failed to accumulate the necessary funds to prepare at least in the shorter term for the major upgrade that is needed. Short terms measures are put in place to cope with increased sewerage capacity and such measures are neither sustainable nor acceptable to the existing local residents whose lives are disrupted by the extra traffic on the roads and the overspill of sewerage which then pollutes the area. Residents are constantly worried about the fast flow of surface water during periods of heavy rainfall that used to sink gradually into green fields. The drainage network is over loaded and run off sweeps down the B2133 into front gardens or else overloads the Lox Stream and imperils back gardens and houses when the stream is over loaded. SW have repeatedly responded to planning application consultation by stating that there is no capacity in the system and that the new Thakeham development of 50 houses will have its sewerage stored in underground tanks and tankered offsite at SW expense.

All new developments are having to provide internal SUDS systems, a clear indicator of being at capacity limits.

### **Lack of Gas Supply**

There is no mains gas in the village, so is not available for diversity of fuel sources.

### **Lack of Electrical Supply**

The electrical supply is limited and comparatively unstable in bad weather as supply is dependent on overhead lines which are vulnerable to falling trees damaging the overhead lines..

The high scale of growth being considered cannot be sustained by the electrical supply.

Many homes in Loxwood rely on oil and the cost of this is becoming unsustainable.

### **CDC Climate Emergency and Lack of Public Transport**

All homes within Loxwood rely heavily on car transport due to the lack of public transport for the Parish. The higher levels of development being investigated cannot be considered sustainable in the current climate emergency on these grounds alone. The number of 'home Workers' is likely to decrease as the government pushes, and the economic challenges also require people to get back into towns and cities for work

**Lack of employment-** There is no substantial employment within the parish and thus residents have to use their cars to get to work as there is no viable public transport. This is not sustainable

**Nearby development** - Dunsfold Park is only 3 miles and is allocated 2600 houses in Waverley's Local Plan and this will increase the burden on the road infrastructure within Loxwood parish

### **Landscape**

The North East part of the district has a unique landscape and this is reflected in the CDC Local Plan Landscape Capacity Study. Loxwood is covered by sections 158 and 159. The conclusions from each of these sections is reproduced verbatim as it describes this unique landscape and concludes that development should be restricted in order not to do irreparable damage to the landscape. **A study of the Loxwood area in the CDC Landscape Capacity Assessment March 2019 concluded:**

#### *158 Loxwood Western Low Weald*

*Sub-area 158 has a medium / low capacity, constrained by its strong rural character, distinctive plateau topography and its role as an integral part of the rural setting of nearby settlement. The sub-area is well-served by an excellent network of bridleways and footpaths crossing the Low Weald and joining with those in adjacent Counties. It is well used and travelled though by locals and visitors. There are views from public footpaths, the canal and the Wey South Path and rural lanes/ farm tracks, with far-reaching views from PROW and plateau looking north. There is a degree of intervisibility between this sub-area and the adjacent sub-area 157 Ifold Northern Weald. Any development within the mid to western part of this sub-area has the potential to affect the character, amenity and qualities of the Arun canal. The area retains a clear sense of history, especially with the proximity of the canal with Devils Hole, the moated manor site, the settlement's historic core and listed buildings, a likely historic drove route (trackway / 'green' lane containing linear bank features) and medieval assarted field pattern extending around the settlement edge. ASNW present with medieval assarted woodland and medieval assart fields surround well-settled farmsteads. This sub-area contains many of the characteristics that describe the 3 LCAs (Low Weald and Low Weald Hills and River Arun Valley), including furze woodland, heathland and high levels of tranquillity. It is possible that a very small amount of additional development may be accommodated around farmsteads as existing building/barn conversions provided it is informed by further landscape and visual impact assessment and can be sensitively integrated into the landscape, respecting the historic farmstead pattern and local distinctiveness, although great care would need to be taken to avoid any landscape or visual harm. As illustrated in photograph 9 the large, irregular field pattern and openness that is*

*appreciated from the Arun canal towpath suggests that the western half of this parcel would be more sensitive to forms of visual intrusion. On the edge and within the settlement boundary 3 SHLAA sites for residential development have been identified with the intention to concentrate development within the Settlement Boundary. It is unlikely that further development along the settlement edge may be accommodated and integrated without adverse negative effect on both the landscape character and the historic features, views and 'openness' across plateau of high ground. Outside this settlement boundary the sub-area is more constrained in landscape terms.*

### *159 Loxwood Eastern Low Weald*

*Conclusion and recommendations and potential capacity of sub-area Sub-area 159 has a low capacity, constrained by its strong rural character, distinctive topography and its role as an integral part of the rural setting of nearby settlement. Within the Rover Lox valley, there are views from public footpaths, the canal, the Wey South Path and from rural lanes/ farm tracks. Despite the high degree of enclosure in many parts of the area, some ridge tops and slopes are prominent. From the PROW network that criss crosses the rolling ridgeline there are notable and distinctive long far reaching views to both the North and South Downs and across the Crawley Vale to the High Weald Forests. PROW also afford clear, close views towards and across the settlement edge and Loxwood Hall clock bell tower. The area retains a clear sense of history with the majority of area covered by medieval assarted fields surrounding the historic settlement core. Small area of designed landscape / informal parkland and features associated with the area's River Lox mill and industrial canal heritage present. Contributes to the setting of many listed buildings located on the edge of Loxwood and within the subarea. This sub-area contains many of the characteristics that describe the 2 LCAs (Low Weald Hills and River Arun Valley), is well used and travelled through by locals and visitors with tranquillity somewhat negatively affected by equestrian related paraphernalia and the B2133. It is possible that a small number of isolated dwellings (in the form of ribbon development within paddocks and equestrian facilities) may be accommodated along both sides of the B2133 provided. This form of development is informed by further landscape and visual impact assessment and sensitively integrated into the landscape, respecting the historic settlement pattern and local distinctiveness, although great care would need to be taken to avoid any landscape or visual harm. Any development in this sub-area would extend the influence of Loxwood village eastwards and would impact on sensitive ecological and landscape features, detrimentally affecting the village's eastern setting. The combination of these factors is likely to result in a negative effect on settlement pattern.*

### **Duty of Cooperation with Neighbouring Authorities**

Loxwood is located at the edge of the CDC area and adjacent to the large village of Billingshurst and Horsham District. Horsham District Council plans are clearly advancing towards the border along the Arun River and this will cause pressure on the infrastructure of Loxwood. This should be taken into consideration when looking at sustainable development within Loxwood. Alfold and Dunsfold in the Waverley District, will put pressure on the transport network in the NE Parishes whose rural roads are not built for such large volumes.

### **Sustainability**

The Revision to the Loxwood Neighbourhood Plan Submission SEA points out sustainability issues with regard to further development within Loxwood as follows:

### Sustainability Issues

1.16 *The overview of the parish character identified a number of issues which have informed the preparation of the sustainability framework in Section 6 below. The main issues collected are listed below and are divided up into the three strands of sustainability, social, economic and environmental issues.*

#### **Social**

- *The parish has a healthy but ageing population and meeting the needs of all sectors of the community poses challenges with regard to housing, employment, community facilities and services.*
- *House prices in the parish are high and the district's high housing affordability ratio poses significant challenges, particularly for first time buyers.*
- *There is a need to provide affordable homes and housing suitable for smaller households and an ageing population.*
- *The parish has a high proportion of 1-2 person households and a high proportion of under-occupied homes*
- *The parish has a high proportion of owner-occupation and a high proportion of large (4+ bedrooms) detached homes. Conversely, the parish has a low proportion of rented accommodation and a low proportion of flats and terraces.*
- *Public transport provision in the parish is relatively poor and car ownership is high.*
- *Some parish services, facilities and infrastructure are under pressure which will increase with any new development (medical and educational facilities, water and sewerage infrastructure)*

#### **Economy**

- *The parish has a small number of local businesses*
- *The parish has a high proportion of home working*
- *The parish has a well-educated population with low unemployment.*

#### **Parish Scene**

And as set out in the SEA to the submission Revised Neighbourhood Plan:

*The parish of Loxwood is predominantly rural and has no large or medium scale industry other than farming. At the district level, the Housing and Economic Development Needs Assessment identifies that over 90% of businesses in the district are micro businesses (employing fewer than 10 people). The majority of residents travel outside of the parish to access employment as indicated through*

*the community survey undertaken to inform the Neighbourhood Plan (14 % worked in Loxwood, 28% worked over 10 miles away from their home with 19% working within West Sussex). However, there are a number of businesses in the village which meet the day to day needs of parish residents, including the following:*

- *Village convenience store*
- *post office*
- *Butchers*
- *Public houses*
- *Hairdresser*
- *Beautician and sports injuries clinic*
- *Vehicle repair and servicing garage*
- *Car sales business*
- *Tree surgery*
- *Furniture design*

### **Environment**

- The parish has a high-quality natural environment and its valued landscapes, wildlife and habitats, in particular those of biodiversity and nature conservation value, face pressures and threats.
- The parish has a significant number of designated heritage assets and other historic assets which face pressure from new development
- Flooding presents a clear risk to many parts of the parish.
- Waste water capacity and infrastructure constraints
- The parish is located in an identified water stress area.
- The UK and Chichester District Council are required to meet stringent climate change targets and Neighbourhood Plans can make an important contribution in meeting these targets

### **Interim Policy Statement (IPS)**

By continuing to use the IPS, Chichester District Council is ignoring these infrastructure concerns and the democratic views expressed in the made Loxwood Neighbourhood Plan and Neighbourhood Plan Regulation 14 Review. The approach taken by Chichester District Council brings into question the whole process of Parishes preparing and amending Neighbourhood Plans considering the very small weight that they seem to carry.