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Representation to Regulation 19 Public Consultation



Project: Chichester District Council Emerging Local Plan
Subject: Representation to Regulation 19 Public Consultation
On behalf of: Artemis Land and Agriculture Limited
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A. SUMMARY AND CONCLUSION

I. The Council's emerging Local Plan is unsound as:

- proposed Policy SI, Spatial Development Strategy (Appendix LPD1, page 38-39), focuses most future growth in the south of Chichester district in an area that is highly constrained in planning terms, with only a moderate amount of growth proposed in the North of the Plan Area which is objectively and comparatively less-constrained;
- proposed Policy HI, Meeting Housing Needs (Appendix LPD1, page 100), sets out a total housing supply of 10,359 homes for the plan period of 1 April 2021 to 31 March 2039, equivalent to 575 homes per year (an already capped figure due to highway constraints in the south). This is a shortfall of 1,134 homes for the plan period, or 63 homes per year, against the Council's minimum local housing need as calculated by the Government's standard housing method and set out in the Council's Housing and Economic Development Needs Assessment (Appendix LPD2, page 42);
- the Council proposes a similar spatial strategy and shortfall in supply of housing against its full housing need to that for the previous (adopted) Local Plan (Appendix LPD3, pages 40 – 41, and 49). This has resulted in the Council being unable to demonstrate a five year housing land supply and manage proposals for speculative development, reflected in some 87% of new housing coming from windfall sites (Appendix LPD4, page 12), so is proven to be unsound;
- despite the historic and proposed shortfall in its housing supply, the Council presents insufficient evidence to demonstrate that the impacts of meeting more of the local housing need would significantly and demonstrably outweigh the benefits when assessed against the policies in the National Planning Policy Framework (2021), taken as a whole;
- the Council's Sustainability Appraisal (Appendix LPD5, page 26) assesses growth scenarios in the North of the Plan Area. A growth scenario including Crouchlands Farm for 1,114 homes (or 62 per year) is found to be most sustainable (Appendix LPD5, page 34) but is discounted without clear and robust reasoning, and a blended growth scenario for 720 homes (or 40 per year) is proposed in the Local Plan (Appendix LPD5, page 40). It is wholly unclear how the Council has arrived at its decision;
- the Water Neutrality Mitigation Strategy (Appendix LPD6, page VI) and Emerging policy NE17 (Appendix LPD1, page 89) allows for 1,796 homes in the North of the Plan Area, of which scenarios 1a and 2a, including Crouchlands Farm, are less than. Water Neutrality is therefore not a constraint when considering a higher level of development in the North of the Plan Area; and
- Crouchlands Farm was also assessed in the Council's Housing and Economic Land Availability Assessment (Appendix LPD7, page 134) as being suitable, achievable and available for rural enterprise-led development / residential mix of up to 600 homes (HELAA ID HPI009).

2. The emerging Local Plan, therefore, is unsound due to it not being positively prepared by the Council in proposing a shortfall of housing supply against its minimum local housing need, where there are no exceptional circumstances to justify this, as well as there being evidence to support additional sites for housing, including at Crouchlands Farm. There is no coherent basis for the Council not taking forward Crouchlands Farm to increase future housing supply given the shortfall.
3. As a result, the Council should be asked to allocate more sites to help bridge the gap in the extent of its housing shortfall and Crouchlands Farm should be considered the obvious first choice given the deliverability of Rickman's Green Village, as demonstrated by the Council's evidence base (Appendix LPD5, page 34, and Appendix LPD7, page 134).
4. In addition, a wealth of technical work has been undertaken to prepare and submit three planning applications for Rickman's Green Village (Chichester District Council reference 22/01735/FULEIA, 22/03114/FULEIA, and 22/03131/OUTEIA) that are currently awaiting determination. These applications further demonstrate the suitability of Crouchlands Farm as a highly sustainable site, capable of delivering up to 600 homes alongside a primary school (or other suitable community facility¹), village hub with farm shop, cookery school, glamping and retail and commercial units, and open space provision, such that it should be allocated in the emerging Local Plan.
5. Artemis, or a representative thereof, therefore wishes to participate in the future hearing sessions for the emerging Local Plan. It is considered that as Crouchlands Farm is the only specific alternative considered in the Sustainability Appraisal, it merits its own hearing session.

¹ West Sussex County Council's Education Team has now responded formally to the planning applications (Appendix RGV42), stating that a primary school will not be required as there are enough primary school places in the local area even if Rickman's Green Village were to be approved. The planning applications have not yet been amended, so the provision of land is still included at this time to allow for the inclusion of a suitable community facility. Further information is being sought regarding this matter.

B. EMERGING LOCAL PLAN ANALYSIS

Introduction

6. This representation has been prepared by DLBP Ltd, on behalf of Artemis Land and Agriculture Limited (“Artemis”), to object to the soundness of the Chichester Local Plan 2021-2039: Proposed Submission (“the emerging Local Plan”) prepared by Chichester District Council (“the Council”) for public consultation between 3 February to 17 March 2023 under Regulation 19 of the of the Town and Country Planning (Local Planning) (England) Regulations 2012.
7. Artemis is the owner and operator of Crouchlands Farm, Rickman’s Lane, Plaistow, Billingshurst, West Sussex RH14 0LE, a 197 hectare livestock farm in the north of Chichester district partly proposed as the site of a new settlement, known as Rickman’s Green Village.
8. The representation is based on the adopted National Planning Policy Framework (2021). There is a draft version currently being consulted on, but even if approved as drafted, it will not apply to a Local Plan that has reached Regulation 19 at this point. Therefore, the draft policies are not referred to.
9. In the interests of conciseness, the appendices list is not exhaustive. For example, only a selection of the planning applications documents, or executive summaries of these, have been included. The planning applications are available on Chichester District Council’s website (planning refs 22/01735/FULEIA, PS/22/03114/FULEIA and 22/03131/OUTEIA), or a full suite of documents can be provided upon request.

Spatial Strategy

10. Proposed Policy S1, Spatial Development Strategy (Appendix LPD1, page 38 – 39), is unsound.
11. Proposed Policy S1 builds on the spatial strategy of the previous (adopted) Local Plan (Appendix LPD3, page 40 – 41) by focusing growth in the south of the District on sites in and around Chichester city, and the east-west corridor. The south of the district, however, is known to be highly constrained in planning-terms. Key constraints identified by the Council are the (lack of) capacity of the A27, flood risk, and the need to protect environmental designations, landscape quality, the historic environment and settlement character (Appendix LPD1, paragraph 3.5).
12. Due to the constraints in the south, in particular capacity issues of the A27, the Council proposes a moderate level of growth in the North of the Plan Area.
13. Previous advice from the Planning Inspectorate (Appendix LPD8, page 4) concluded that the Council should reassess its adopted spatial strategy and distribution of development in other parts of the District to establish whether the housing need could be met in another way. The emerging Local Plan, however, does not reassess the distribution of development sufficiently.
14. Proposed Policy S1 is unsound as the Council’s evidence base demonstrates that additional housing could be delivered in the comparatively less-constrained North of

the Plan Area, including at Crouchlands Farm, so the proposed policy is not positively prepared, and nor is it appropriately justified. This is expanded upon further below.

North of the Plan Area

15. Proposed Policies A15, Loxwood (Appendix LPD1, page 260) and H3, Non-Strategic Parish Housing Requirements 2021 – 2039 (Appendix LPD1, page 103) are also unsound.
16. The emerging Local Plan proposes one allocation for housing in the North of the Plan Area, Policy A15, Loxwood, for a minimum of 220 homes to come forward over the plan period, all through the neighbourhood plan process.
17. Proposed Policy H3 sets out non-strategic targets for 25 new homes to be delivered over the plan period in Plaistow and Ifold Parish, 50 in Kirdford Parish, and 75 in Wisborough Green, all through neighbourhood plans (of which Plaistow and Ifold does not even have a draft Neighbourhood Plan) or subsequent development plans (which have not even begun preparation yet).
18. It is clear, when looking at the District's population data alone that the North of the Plan area should, proportionately, take on more housing. This is because:
 - the population for the entire District (excluding the South Downs National Park area) is 89,982², which comprises 8,396 in the North of the Plan Area and 81,586 in the remaining south of the District;
 - the emerging Local Plan proposes 10,359 homes over the Plan period, comprising 370 in the North of the Plan Area and 9,989 in the remaining south of the District;
 - if the proposed housing was to be distributed evenly across the District, one home should be allocated per 11.5 people. An even distribution would therefore result in 966 homes in the North of the Plan Area;
 - however, the Local Plan only proposes 370 homes in the North of the Plan Area. This is a shortfall of 596 homes against what should be provided (966 homes) if it were to be evenly distributed, which equates to a 161% shortfall.
19. Proposed Policies S1, H3 and A15 should be found unsound due to there being evidence (set out in the Council's own evidence base and within this representation) demonstrating that additional housing could be delivered in the North of the Plan Area to meet future needs, particularly in the parish of Plaistow and Ifold at Crouchlands Farm.
20. Furthermore, proposed Policies S1, H3 and A15 are unsound as they are not justified or effective, but are overly reliant on the delivery of additional homes in the North of the Plan Area on sites allocated in neighbourhood plans for the respective parishes when there is no evidence to demonstrate that any sites are likely to be allocated, nor even that neighbourhood plans will be prepared by each of the parishes in the plan period. For example, proposed Policy H3 seeks to deliver 25 new homes in Plaistow

² Using figures from the Housing and Economic Development Needs Assessment (Appendix LPD2, table 3.1).

and Ifold parish, however work to prepare its neighbourhood plan has ceased indefinitely.

Sustainability Appraisal

21. The Council's Sustainability Appraisal (Appendix LPD5, page 34) considered the following six growth scenarios to determine the number of homes to be delivered across the four parishes (Kirdford, Loxwood, Plaistow and Ifold, Wisborough Green) in the North of the Plan Area:
 - i) 1, lower growth of only the four parishes providing 514 homes (29 homes per year);
 - ii) 1a, lower growth of the four parishes plus Crouchlands Farm, providing 1,114 homes (62 homes per year);
 - iii) 2, higher growth of only the four parishes, providing 1,139 homes (63 homes per year);
 - iv) 2a, higher growth of the four parishes plus Crouchlands Farm, providing 1,514 homes (84 homes per year);
 - v) 3, highest growth of only the four parishes, providing 1,964 homes (109 homes per year); and
 - vi) 3a, highest growth of the four parishes plus Crouchlands Farm, providing 2,564 homes (143 homes per year).
22. The Council's Sustainability Appraisal concluded that the Council is supportive of a blend of Scenarios 1 and 2 (Appendix LPD5, page 40).
23. To reflect this, proposed Policy H3 Non-Strategic Parish Housing Requirements 2021 – 2039 (Appendix LPD1, page 103) therefore seeks:
 - i) lower growth at Kirdford (50 homes) and Plaistow and Ifold (25 homes) on unallocated sites; and
 - ii) higher growth at Loxwood and Wisborough Green through a combination of one allocated site for 220 homes (proposed Policy A15) and other unallocated sites (75 homes).

	Scenario 1 Low	Scenario 1a Low Crouchlands	Scenario 2 Higher	Scenario 2a Higher Crouchlands	Scenario 3 Highest
SA topic	Rank of preference and categorisation of effects				
Accessibility	2	★1	4	3	5
Air / env quality	=	=	=	=	=
Biodiversity	?	?	?	?	?
CC adaptation	=	=	=	=	=
CC mitigation	?	?	?	?	?
Communities and health	2	★1	4	3	5
Economy, employment	=	=	=	=	=
Historic env	2	★1	4	3	5
Housing	6	5	4	3	2
Land, soils, resources	=	=	=	=	=
Landscape	2	★1	4	3	5
Transport	★1	2	3	4	5
Water	★1	2	3	4	5

Figure 1: Appraisal of the North of the Plan Area reasonable growth scenarios (Appendix LPD5)

24. However, Figure 1 of the Council's Sustainability Appraisal (Appendix LPD5, page 34), above, very clearly shows that scenario 1a (lower growth of only the four parishes plus Crouchlands Farm) scores the best overall i.e., is the most sustainable option. This is due to scenario 1a scoring highest in regard to the site's accessibility, communities and health, lack of heritage constraints relative to the other scenarios, as well as lack of landscape constraints relative to the other scenarios.
25. With regards to the analysis of the remaining criteria:
- Air Quality and Environmental Quality; Biodiversity; Land, Soils and Resources – whilst we appreciate the information may not be available for the 'other areas' accounted for in each growth scenario, the scoring does not reflect the information within the three planning applications at Crouchlands Farm (e.g. Ecological Impact Assessments (Appendices RGV17 and RGV18), Air Quality Assessments (Appendix RGV8 – RGV10), Environmental Impact Assessments (Appendices RGV21 and RGV22), Agricultural Land Classification Assessment (Appendix RGV7), Land Quality Assessments (Appendices RGV26 and RGV27, etc));
 - Housing – the scoring for this category is inconsistent with the other criterion, as it does not exclude option 3a from the ranking. For example, Scenario 1a should therefore score 4, rather than 5, if based purely on the quantity of

homes. But page 4 of the Sustainability Appraisal (Appendix LPD5) confirms that the objective is to (our **emphasis**): “*deliver **suitable, well designed, energy efficient** and affordable housing to meet local needs, in **safe and accessible neighbourhoods with mixed and balanced communities**”.* In the absence of supporting evidence on the qualitative elements of this objective, other than at Crouchlands Farm, the method of scoring this criteria is unsound as it does not meet the full objective. When considering the high-quality design of homes at Crouchlands, it is clear that scenarios 1a and 2a should in fact score higher; and

- Economy, employment – the Sustainability Assessment fails to acknowledge the economic benefits proposed at Crouchlands Farm, which will have a significant economic benefit for Chichester District Council and the wider area. This is demonstrated in the Economic Impact Assessment submitted with planning application (Appendix RGV19). A second Economic and Social Value Impact Assessment as also been submitted which considers the scenarios of the whole of the proposal (Appendix RGV20), but we wholly appreciate that the Council did not have access to this at the time of preparing the Sustainability Appraisal.
26. There is a clear disconnect between the scoring of the scenarios, how each scenario and Crouchlands Farm has been assessed by the plan-maker, and how the conclusion to proceed with a blend of scenarios 1 and 2 has been made. Page 34 of the Sustainability Appraisal (Appendix LPD5) clearly states that it “*is undertaken without any assumptions regarding the degree of importance, or ‘weight’, that should be assigned to each of the topics in the ‘planning balance’. It is only the Council, as the decision-making authority, that is in a position to arrive at an overall conclusion on the best performing growth scenario on balance*”. One must therefore assume that the Council has assigned more importance and weight to certain criteria of the scoring. But there is a clear lack of explanation of this weighting exercise, so the results of the testing is not justified.
27. The Council’s reasoning for supporting a blend of scenarios 1 and 2 at section 7.3 of the Sustainability Appraisal (Appendix LPD5, page 40) is therefore wholly unclear, not justified, and is unsound.
28. In summary, the Council’s position is that:
- the government’s standard housing methodology determines an objectively assessed need of 638 dwellings per annum, or 11,484 over the plan period (which is a capped figure at 40% above the ‘baseline’ need figure);
 - the figure is then capped further to the plan area as a whole to 575 dwellings per annum, because:
 - capacity constraints associated with the A27 in the south of the plan area results in a resolution that there is capacity for no more than 535 homes per year in the south (i.e. a further capping of its proposed supply);
 - this means that 103 homes per year need to be made up in the North of the Plan Area, or 1,854 homes over the plan period;
 - a growth scenario (1a) including Crouchlands Farm for 1,114 homes (or 62 per year) is found to be most the sustainable option in the Sustainability

Appraisal when considering the score of figure 1 above (Appendix LPD6, page 34) but is discounted without clear and robust reasoning;

- the Council thus proposes only 40 homes per year in the North of the Plan Area due to ‘wide ranging planning reasons’.

29. This is **wholly unsubstantiated** as it means that there is a shortfall of 63 homes per year, or 1,134 homes over the plan period. Also:

- the Sustainability Appraisal (Appendix LPD5, page 16) sets out that water neutrality has implications for the growth quantum in the North of the Plan Area, so this area cannot accommodate the full 63 homes per year (which is already a capped figure);
- but the Water Neutrality Mitigation Strategy (Appendix LPD6, page 15, table 3.1), and the Sustainability Appraisal (Appendix LPD5, page 16), both confirm that the North of the Plan Area can accommodate 1,796 homes (circa 100 homes per year);
- and even if a suitably precautionary approach is taken (considering fewer homes, by 5% or 10%), 5% fewer homes would equate to 1,706 homes, and 10% fewer homes would equate to 1,616 homes;
- therefore, even with the highest buffer (10%) applied, 1,616 homes could be accommodated in the North of the Plan Area over the plan period (circa 90 homes per year). This means that almost the entirety of the actual shortfall (1,854 homes) could be reached in the North of the Plan Area.

30. We accept that the 1,854 homes required to be made up in the North of the Plan Area cannot be accommodated, due to water neutrality constraints and so scenarios 3 and 3a are discounted.

31. However, scenarios 1 (514 total homes), 1a (1,114 total homes), 2 (1,139 total homes), and 2a (1,514 total homes) would all be below the most precautionary approach taken to water neutrality constraint. Taking the highest growth scenario 2a (with Crouchlands Farm), there would still be headroom of 102 homes in terms of the Water Neutrality Mitigation Strategy.

32. Therefore, water neutrality cannot be the determining constraint for discounting scenarios 1a or 2a from the Sustainability Appraisal (Appendix LPD5).

33. Therefore, there is very limited explanation about what the “wide ranging planning reasons” are, and how the resulting shortfall has been reduced from 103 homes per year to 40 homes per year in the North of the Plan Area. Three examples are referenced (with our comments in **bold**):

- the rurality of the area – **whilst we appreciate and wholly recognise this is a designated Rural Area under Section 157 of the Housing Act 1985, so are many of the sites in the south of the plan area that already have, and are planned to, accommodate significant growth. But other than this, a large part of the North of the Plan Area, including Crouchlands Farm, is unconstrained – it is not in the Green Belt, an Area of Outstanding Natural Beauty, a Special Area of Conservation, a Site of Special Scientific Interest,**

or other constraints. This is accepted by the Council at page 34 of the Sustainability Appraisal (Appendix LPD5);

- the entire area falls within a constrained water resource zone – this is not a constraint. The Council’s own proposed Policy NE17 contradicts this reasoning, as clearly sets out how developers can provide evidence that new development will be water neutral. In addition, Natural England’s Mitigation Strategy (Appendix LPD6, page V - XI) identifies the area as having capacity for 1,784 homes, and growth scenarios 1, 1a, 2 and 2a would all allow for headroom when considered against this (see paragraphs 28 – 32 above); and
 - transport-related barriers to growth, whereby Waverley Borough and Horsham District have raised concern – as set out in Section C below, the planning applications at Crouchlands Farm contain a wealth of transport assessments and evidence that there are suitable, reasonable, and proportionate ways of mitigating this. Horsham District and Waverley Borough Councils have not raised objection to the planning applications, either on transport or any other grounds (Appendices RGV40 and RGV41, respectively). Paragraph 5.2.33 of the Sustainability Appraisal (Appendix LPD5) accepts that the strategic growth options, i.e. Crouchlands Farm, have merit in transport terms.
34. Further details of the Council’s assessment of Crouchlands Farm in the Sustainability Appraisal (Appendix LPD5) are set out in Section C of this representation, alongside our response to each of the points raised by the Council.

40 homes per year

35. A meeting was held between the Council and an Advisory Inspector in October 2022 (Appendix LPD9). This precedes the publication of the Sustainability Appraisal (Appendix LPD5), the growth scenario testing, and the Water Neutrality Mitigation Strategy (Appendix LPD6), which have since concluded that development of up to 1,796 homes can be sustainably achieved in the North of the Plan Area over the plan period. The Sustainability Appraisal (Appendix LPD5) excluded scenario 3a on the basis of this being exceeded (page 26).
36. Nevertheless, paragraph 5 of the Advisory Inspector’s notes (Appendix LPD9) states “[...] the Council consider[s] a housing requirement below the need derived from the standard method (some 535 dwellings per annum (dpa) in the southern plan area and the potential for a further 40 dpa in the northern plan area compared to 638 dpa)”. And paragraph 9 lists a number of potentially constraining factors (e.g. limited public transport, limited facilities, water neutrality etc), which the Advisory Inspector states (our **emphasis**): “**appear** to support the Council’s position that a maximum of 600-700 homes could be delivered over the Plan period (or around 40 dpa).”
37. However, it is unclear what evidence informed the figure of 40 homes per year in the Advisory Inspector’s note, particularly as:
- none of the scenarios in the Sustainability Appraisal specifically tested a 40 homes per year scenario; and

- the Water Neutrality Mitigation Strategy, restricting development in the North of the Plan Area to 1,796 homes was not published until December 2022.
38. It is also unclear how the proposed figure of 40 homes per year is reached as a blend of scenarios 1 and 2. For example, when calculating the completions (54), commitments (198), windfall (62) figures at table 5.5, plus the 220 homes at Loxwood, 25 homes at Plaistow and Ifold, 50 homes at Kirdford, and 75 homes at Wisborough Green, the total amounts to 684 homes over the plan period, or 38 homes per year.
39. Despite this, the Emerging Local Plan (Appendix LPD1, pages 99 and 100) sets out a figure of 40 homes per year over the plan period (679 homes in total), accounting for completions, commitments as of December 2022, windfall, allocation at Loxwood, and non-strategic allocations at Kirdford, Plaistow and Ifold, and Wisborough Green. This is contrary to the results of the Sustainability Appraisal.
40. In a previous meeting with the Advisory Inspector regarding water neutrality (September 2022, Appendix LPD10), the Inspector confirms that, prior to submission of a plan (our **emphasis** added):
- “the Inspectorate can only provide advice based on national planning policy and guidance, along with our own personal experience.*
- While it is possible to explore issues in advisory meetings it is **not possible to say definitively that the approaches taken will lead to a sound plan.** That’s because ultimately each plan will be considered by an Inspector who has been appointed to carry out an independent examination. In doing so they will consider all the evidence to justify the plan, the representations and what was discussed at the hearing sessions.”*
41. It is therefore not sufficient reasoning for the Council to submit the Emerging Local Plan, using a blend of scenarios 1 and 2 that happen to match a 40 homes per year figure in the North of the Plan Area, on the basis of the Advisory Inspector’s commentary in October 2022 (Appendix LPD9), which preceded the issuing of the Water Neutrality Mitigation Study (Appendix LPD6) and the Sustainability Appraisal (Appendix LPD5). One can assume there has been no examination of evidence by the Advisory Inspector, just commentary based on the Council’s own - unsound - narrative.
42. For the above reasons, the Council has therefore not positively prepared or justified the reasons for limiting growth in the North of the Plan Area to 40 homes per year.

Development Plan Infrastructure Panel

43. The Sustainability Appraisal (and commentary at the Special Cabinet and Full Council meetings held on 23 and 24 January 2023) makes references to conversations held and decisions made by the Development Plan Infrastructure Panel. A Freedom of Information request was submitted to request the minutes of these meetings, and the response was that the meetings are confidential and so the minutes would need to be heavily redacted.
44. The transparency of this is in question. While the meetings may not be ‘public’ in the sense that the public can attend and watch, the meetings relate to a document that is

in the public domain and subject to public consultation, and so there should be transparency into how the decisions and conclusions have been made and justified.

45. In light of the above, proposed Policies S1, H1, and H3 are unsound for not being positively prepared or justified, directing insufficient growth in the North of the Plan Area where there is evidence to support the allocation of additional housing in a more-sustainable way, by including Crouchlands Farm.

Housing Need

Shortfall of supply

46. Proposed Policy H1, Meeting Housing Needs (Appendix LPD1, page 100), is unsound.
47. Paragraph 61 of the National Planning Policy Framework (2021) sets out that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach”.
48. The Council’s Housing and Economic Development Needs Assessment (Appendix LPD2, page 42) identifies a housing need of 763 homes per year based on the Government’s standard method. That figure comprises 125 homes per year for the part of the district in the South Downs National Park and 638 homes per year for the remainder of the district (the plan area). This equates to a total requirement for 11,484 new homes for the plan period of 1 April 2021 to 31 March 2039.
49. Proposed Policy H1, however, sets out the total housing supply of 10,359 homes for the plan period, which equates to 575 homes per year. This is a shortfall in supply of 1,134 homes, or 63 homes per year, against the minimum local housing need as calculated by the Government’s standard method.
50. The Council attempts to justify the proposed shortfall in housing supply due to key constraints in the south (the A27, flood risk, environmental designations) and the north of the district. In the north, the Council identifies key constraints to be the protection of environmental designations, landscape quality, historic environment and settlement character, and water neutrality (Appendix LPD1, paragraph 3.5).
51. We note that this was echoed by the Planning Inspectorate in a Local Plan Advisory Meeting, held on 5 October 2022, who found that:

“The northern area is not constrained by the capacity of the A27 but has its own issues. As a predominantly rural area with limited facilities and public transport, it is not an obvious location for significant development. There are also landscape and historic environment constraints. It is also affected by water neutrality requirements and the potential for capacity issues on the wider highway network. These factors appear to support the Council’s position that a maximum of 600-700 homes could be delivered over the Plan period (or around 40 dpa)”. (Appendix LPD9, paragraph 9).
52. However, that advice was issued prior to the Council’s Sustainability Appraisal (Appendix LPD5) and Water Neutrality Mitigation Strategy (Appendix LPD6) being published, which have since concluded that development of up to 1,796 homes in the North of the Plan Area over the plan period can be sustainably achieved.

53. The Council makes no justification that not meeting its housing need in full would significantly and demonstrably outweigh the benefits of meeting the majority of the shortfall of need in the North of the Plan Area, when assessed against the policies in the National Planning Policy Framework (2021) taken as a whole. The Council entirely overlooks the fact that its objectively assessed housing requirement is not being met. The only reason the Council makes for not meeting its housing need in the North of the Plan Area is set out in a Cabinet Report, dated 23 January 2023, which states:

In the north of the Plan area, previously, given it is less sustainable compared to Chichester and the east-west corridor, the Local Plan has only provided for only limited growth, focused on enabling these communities to continue to sustain local facilities and contribute towards meeting locally generated housing needs, and support for the rural economy, in line with the settlement hierarchy. However, due to the constraint of the A27 in the south of the plan area (see housing section at para 5.34 onwards below), it is considered that this Plan should provide for a moderate level of growth in the north to help to make up the overall shortfall of dwellings, in order to demonstrate that 'no stone has been left unturned' in identifying housing supply.

High levels of growth were considered at Loxwood, Kirdford, Wisborough Green and Plaistow and Ifold, but ruled out due to the need to conserve the rural character of the area and its high quality landscape and to minimise the impact on the historic environment. The spatial strategy therefore includes growth at Kirdford (50 dwellings), Wisborough Green (75 dwellings) and Plaistow and Ifold (25 dwellings). Loxwood is the least constrained settlement in the north of the plan area, and benefits from the most services and facilities, including healthcare. Therefore, a moderate amount of growth is appropriate for Loxwood of 220 dwellings, to come forward through the neighbourhood planning process.

The SA of the northern options considered 3 scenarios (plus each scenario with the addition of a potential new settlement at Crouchlands), for low, higher and highest growth. The highest growth scenarios perform poorly and therefore the Local Plan reflects a combination of the low and higher growth scenarios tested, which takes into account the constraints of each settlement and the need to avoid cross boundary traffic and education impacts. A new settlement at Crouchlands has been ruled out as it is not of a sufficient size to be a sustainable new settlement in a rural location and because of the negative impact on the landscape and intrinsic rural character of the area and poor sustainable transport links. (Appendix LPD11, paragraphs 5.19 – 5.21).

54. The Council fails to make a case that the impacts of meeting this need would outweigh the harm caused by not meeting the full housing need, or indeed that impacts of even getting closer to meeting this need would demonstrably outweigh the harm of not meeting housing need.
55. On the contrary, there is evidence to demonstrate that housing supply could be higher by at least 600 homes through the allocation of Crouchlands Farm as a site considered to be suitable, achievable and available by the Council's Housing and Economic Land Availability Assessment (Appendix LPD7, page 134). The allocation of Crouchlands Farm would be acceptable in water neutrality terms, with both Scenarios 1a and 2a of the Sustainability Appraisal (Appendix LPD5, page 34) delivering new homes below the maximum figure set out in the Water Neutrality Mitigation Report (Appendix LPD6,

page VI). Furthermore, there are no heritage and landscape constraints associated with Crouchlands Farm.

56. In addition, the information supporting the applications for Rickman's Green Village further demonstrate Crouchlands Farm as a highly sustainable site, capable of delivering up to 600 homes alongside a village hub with farm shop, retail and commercial units, office and flexible working space, and open space provision (as well as provision for a primary school³ or other suitable community facility).
57. Proposed Policy HI is therefore unsound on the basis that it is not positively prepared or justifiable when accounting for all reasonable alternatives.

Historic under-delivery

58. The previous (adopted) Local Plan (Appendix LPD3, page 49) did not provide a sufficient supply of housing to meet the Council's full housing need at the time of adoption, which is the same approach proposed by the Council for Policy HI.
59. Many of the sites allocated for housing in the previous (adopted) Local Plan on sites in the south of the District have not been delivered, as demonstrated by Appendix 2, Table E of the Council's Five Year Housing Land Supply Position Statement (Appendix LPD12). This confirms that four sites allocated by the Council previously, with a combined projected supply of 2,210 homes, have not been started, and do not even benefit from planning permission. We understand that none of those sites has come forward due to impediments resulting from site ownership, which raises questions around the approach taken by the Council in allocating sites for housing in the south in the past, which Policy SI proposes to use again.
60. The Council's failing to meet its housing supply historically has also resulted in it now being unable to demonstrate a five year housing land supply and so unable to effectively manage proposals for speculative housing developments. This is reflected in a significant proportion – some 87% – of new housing coming from windfall sites (Appendix LPD4, page 12).
61. In addition, the Council introduced a new Interim Position Statement for Housing (Appendix LPD13) which set out a spatial strategy to allow new development adjacent to settlement boundaries as a way of significantly boosting housing supply (Criterion I). The Council has not carried this strategy forward into the emerging Local Plan. This is despite the Planning Inspectorate recommending this in a recent appeal decision (Appendix LPD14), stating that the application of Criteria I suggested "*the Council's [adopted] spatial strategy may be out of date, as a more permissive approach appears necessary to maintain a five-year housing land supply.*" (paragraph 25).
62. Proposed Policies SI and HI are therefore unsound as they follow the same approach of the previous (adopted) Local Plan, which has proven to be ineffective and

³ West Sussex County Council's Education Team has now responded formally to the planning applications (Appendix RGV42), stating that a primary school will not be required as there are enough primary school places in the local area even if Rickman's Green Village were to be approved. The planning applications have not yet been amended, so the provision of land is still included at this time to allow for the inclusion of a suitable community facility. Further information is being sought regarding this matter.

unsustainable, contrary to national policy, and the recommendations of the Planning Inspectorate.

Longer Term Growth Requirements

63. The emerging Local Plan as originally published (Appendix LPD15), prior to the meetings of the Council's Cabinet and Full Council on 23 and 24 January 2023, respectively, set out *"some reservations about whether it will be appropriate in the longer term to continue to rely on existing sources of supply (e.g., urban extensions and urban intensification) indefinitely given the potential for ongoing increased levels of housing needs"* (paragraph 5.11).
64. In doing so, it identified that a new settlement of 2,000 – 3,000 dwellings to accommodate potential longer-term growth needs beyond the Plan period (i.e. 2039 onwards) will need to be explored.
65. At the meeting of the Council's Cabinet, a proposed amendment was agreed to remove the above wording and instead insert:
- "Beyond the Plan period additional planned provision for housing will be required. During the course of preparing this Plan, it has become apparent that it may not be appropriate in the longer term to continue to rely completely on sources of supply such as urban extensions and urban intensification"*
- [...]
- "In order to be in a position to update this Local Plan within the next five years the Council will need to consider future population and household growth. At the same time, the requirement for sufficient homes to house a local workforce without relying on excessive in-commuting to the District's workplaces will need to be considered. The continual evolution of National Planning Policy also presents challenges as in what national, regional, sub-regional and plan area strategic planning context any future reviews of this plan may be undertaken."* (Appendix LPD1, paragraphs 5.11 – 5.12).
66. Reference is then made to the need to work *"bilaterally with neighbouring authorities in seeking to find cross boundary strategic solutions to future growth requirements"* (Appendix LPD1, paragraph 5.13).
67. The emerging Local Plan (Appendix LPD1, paragraph 5.14) continues to recognise a need to facilitate the identification of possible new development sites specifically within the Chichester plan area, however solutions to meet that need are not explored fully.
68. The Council states that it would consider sites that (with our commentary in **bold**):
- i) *are of a sufficient scale to support potential long-term development needs arising and support the provision of key infrastructure and community facilities – **Rickman's Green Village is of a scale similar to surrounding villages, and will provide all necessary key infrastructure as well as community facilities such as a potential primary school (or other suitable community facility), sports pitches, and shops;***

- ii) *are comprehensively planned in consultation with existing communities and key stakeholders – significant public engagement has been undertaken, including two in-person public consultation events, and pre-application discussions with West Sussex County Council (on transport, and education) and Chichester District Council;*
 - iii) *provide for a sustainable, inclusive and cohesive community promoting self-sufficiency and with high levels of sustainable transport connectivity – a new bus service connecting Rickman’s Green Village to Billingshurst is proposed, and on-site infrastructure is provided to promote self-sufficiency;*
 - iv) *include on-site measures to avoid and mitigate any significant adverse impacts on nearby protected habitats – extensive ecology surveys and assessments have been undertaken to ensure habitats are protected. For example, 10 – 30 m buffers have been incorporated around Ancient Woodland;*
 - v) *provide a mix of uses to meet longer term development needs and contribute towards its distinctive identity – the village hub will provide office spaces, shops, a café, leisure facilities and a potential school or other suitable community facility to meet long term needs of future residents; and*
 - vi) *are of a layout and form that avoids coalescence with existing settlements and does not undermine their separate identity; respects the landscape character and conserves and where possible enhances the character, significance and setting of heritage assets – Rickman’s Green Village has been designed to be a new rural village that does not rely on or coalesce with other surrounding villages. The design has been landscape-led and reflects the character of nearby villages, with contemporary features. There are a number of mitigation measures in place to ensure the setting of heritage assets are protected.*
69. Proposed Policies SI and HI are therefore unsound. The Council acknowledges that there are ways of meeting future housing need, which could include an allocation of Crouchlands Farm, but avoids deploying these now, which is not justified.

Water neutrality

70. Proposed Policies SI, Spatial Development Strategy (Appendix LPD1, page 40 – 41), HI, Meeting Housing Needs (Appendix LPD1, page 100), and H3, Non-Strategic Parish Housing Requirements 2021 – 2039 (Appendix LPD1, page 103) are unsound, and contradictory to proposed Policy NE17, Water Neutrality (Appendix LPD1, page 89)
71. The Council’s Sustainability Appraisal (Appendix LPD5), in assessing the proposed growth scenarios for the North of the Plan Area, states that water neutrality remains a “key constraint to higher growth” (page 40), despite a Mitigation Strategy (Appendix LPD6) having been agreed.
72. That Mitigation Strategy (Appendix LPD6) assumes 1,796 homes being delivered in the North of the Plan Area which the Council’s Sustainability Appraisal (Appendix LPD5, page 16) states:

“immediately serves to indicate that there is no potential to deliver the high growth target figure of 1,854 homes as the (minimum) level of growth that would be necessary in the northeast plan area, were the local plan housing requirement to be set at LHN [local housing need].”

73. Based on the above, the Council should have discounted the highest growth scenarios for the North of the Plan Area in the Sustainability Appraisal Scenarios 3 and 3a, which propose 1,964 and 2,564 homes, respectively for delivering more than 1,796 homes (Appendix LPD5, page 26). Page 26 of the Council’s Sustainability Appraisal (Appendix LPD5) states, however, *“On balance, just Scenario 3a [highest growth of the four parishes plus Crouchlands Farm, providing 2,564 homes] is ruled out as unreasonable, on this basis, leaving five reasonable growth scenarios”*. The Council provides no further justification for the inclusion of Scenario 3.
74. The Sustainability Appraisal (Appendix LPD5) goes on to state that whilst a Mitigation Strategy has been agreed, it *“cannot be implemented until further work has been completed in order to design / set up strategic offsetting schemes. In this light, the proposed strategy of restricting growth somewhat [in the North of the Plan Area] is supported”* (page 60).
75. That assessment is at odds, however, with proposed Policy NE17, Water Neutrality (Appendix LPD1, page 89), which states that *“Development proposals are not required to utilise the planning authority-led offsetting scheme and may bring forward their own offsetting schemes.”*
76. The Council, therefore, seeks to use water neutrality to limit future growth in the North of the Plan Area, despite proposed Policy NE17 facilitating appropriate development from coming forward, such as that proposed at Crouchlands Farm. Proposed Policies S1, H1 and H3 are unsound for not being positively prepared or justified.

C. CROUCHLANDS FARM

77. Our analysis of the Council’s emerging Local Plan shows that it cannot be found sound as the Council proposes a shortfall of supply against its minimum local housing need where there are no exceptional circumstances to justify this, as well as there being evidence to support additional sites for housing.
78. As a result, the Council should be asked to allocate more sites to help bridge the gap in the extent of its housing shortfall and Crouchlands Farm should be considered the obvious first choice given the deliverability of Rickman’s Green Village, as demonstrated by the Council’s evidence base (Appendix LPD5, page 34, and Appendix LPD7.5, page 134), and the evidence presented below.

The Vision

79. Crouchlands Farm is located in the north of Chichester District and lawfully operates as a livestock farm and comprises 197 hectares of fields in agricultural use, an assortment of agricultural buildings and associated hardstanding, and areas of woodland.
80. Figure 2, below, shows the location of Rickman’s Green Village at Crouchlands Farm, the surrounding villages, and the wider context of the North of the Plan Area.

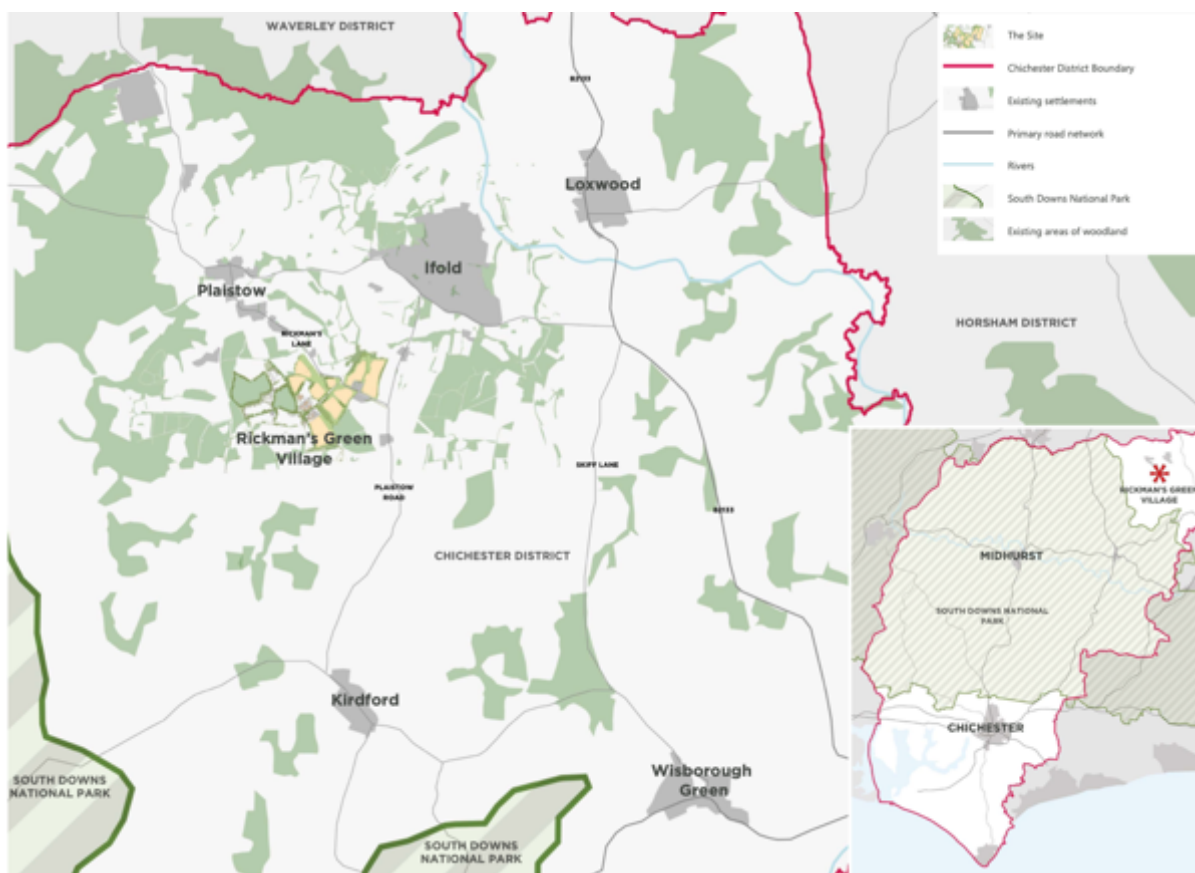


Figure 2: District context of Rickman’s Green Village at Crouchlands Farm (DLBP Ltd)

81. Artemis purchased Crouchlands Farm in 2019 and has spent more than £7.5 million remediating and regenerating the site and addressing the effects of historic damage caused by the previous use and operations. This remediation work has included the removal of a biogas plant, clearance of waste materials and restoration of waste storage lagoons, improvements to the existing Public Rights of Way network, restoration of perimeter fencing, and reintroduction of livestock.
82. Artemis is seeking to re-develop part of Crouchlands Farm to create Rickman's Green Village (see Figure 3, below), a new settlement comprising 600 homes, a primary school and early years and special needs provision (or other suitable community facility), village hub with farm shop, cookery school, glamping and retail and commercial units, and open space provision.



Figure 3: Illustrative Masterplan of Rickman's Green Village (DLBP Ltd)

Live Applications

83. Rickman's Green Village is being proposed by way of three planning applications (all currently under determination) that comprise:
- Whole Farm Plan (village hub) application (Council reference 22/01735/FULEIA) for the 'Regeneration of Crouchlands Farm, comprising demolition of selected buildings, extension, refurbishment and remodelling of selected buildings and the erection of new buildings to provide up to a total of 17,169 sq m (including retained / refurbished

existing buildings) comprising the existing farm hub (sui generis), a rural enterprise centre (Use Classes E, C1 and F1), a rural food and retail centre (Use Class E and F1), an equestrian centre (Use Class F2 and C1) and a glamping site (Use Class E and sui generis); provision of new hardstanding, pedestrian, cycle and vehicular access, circulation and parking, landscaping including new tree planting, maintenance and improvements to the Public Rights of Way, site infrastructure and ground remodelling.’;

- ii) Rickman’s Green Village Phase 1 application (Council reference 22/03114/FULEIA) for the ‘Erection of 108 dwellings (Use Class C3), and associated access and street network, footpaths, open spaces, plant, landscaping and site infrastructure.’; and
 - iii) Rickman’s Green Village Phase 2 application (Council reference 22/03131/OUTEIA) for an ‘Outline planning application (with all matters reserved except access) for the erection of up to 492 dwellings (Use Class C3), education provision including primary school (Use Class F1) and associated access, footpaths, open spaces, landscaping and site infrastructure’.
84. The Whole Farm Plan application is being amended to address responses received to date from technical consultees, the main change being the removal of the Equestrian Centre, so the applications work seamlessly with one another. The amendments are due to be submitted to the Council on 27 March 2023. An extension of time was requested by Artemis to allow for these amendments and has been agreed to 31 March 2023. It is likely to be extended again to allow the Council to consider the amendments.
85. The determination deadline for the Rickman’s Green Village Phase 1 and 2 applications is 13 April 2023. An extension of time has been agreed to 31 May 2023.
86. The three applications have been prepared to work seamlessly together to create Rickman’s Green Village, ensuring the delivery of a highly sustainable settlement at Crouchlands Farm.
87. The applications are supported by a wealth of technical work, all of which provides evidence to demonstrate the suitability of Crouchlands Farm as a highly sustainable site, capable of delivering up to 600 homes alongside a village hub, such that it should be allocated in the emerging Local Plan. The proposal also includes the option to provide land for a primary school if required, but West Sussex County Council’s Education team has now implied that there is no requirement for this (Appendix RGV42), even if Rickman’s Green Village were to be built-out. If the primary school is not provided, the land allocated for it would remain available for another suitable community facility.

Local Plan Engagement

88. Since 2019, Artemis has engaged with the Council to promote Crouchlands Farm as a possible allocation in the emerging Local Plan.
89. Artemis has engaged more proactively with the Council since October 2021 for the allocation of Rickman’s Green Village and 600 homes, specifically.
90. Past engagement in the Local Plan process has included:

- 13 June 2022 – letter issued to Council’s senior leadership team regarding the proposal for Rickman’s Green Village (Appendix ENG1);
 - 6 July 2022 – attendance at an (online) meeting with Diane Shepherd (Chief Executive), Andrew Frost (Director for Planning and Environment), and Tony Whitty (Divisional Manager for Planning Policy, Conservation and Design) to discuss the possibility of allocating Rickman’s Green Village in the emerging Local Plan; and
 - 27 June 2022 - 14 December 2022 – issuing of technical information and evidence to the above, including a public consultation letter (Appendix ENG2, issued 27 June 2022), proposed allocation information pack (Appendix ENG3, issued 4 July 2022), allocation briefing note and illustrative masterplan (Appendix ENG4 and ENG5, issued 11 July 2022), public consultation update and presentation boards (Appendix ENG6 and ENG7, issued 14 July 2022), proposed landscape strategy (Appendix ENG8, issued 5 August 2022), bus feasibility note (Appendix ENG9, issued 23 September 2022), and a letter to notify of submission of the Rickman’s Green Village Phase 1 and 2 planning applications (Appendix ENG10, issued 14 December 2022).
91. Despite this, Crouchlands Farm was not included in the emerging Local Plan as a proposed allocation, the reasons for which the Council has not sufficiently evidenced.

Site Sustainability Assessment

Housing provision

92. As explained at paragraphs 29 – 33 above, the Council’s emerging Local Plan (Appendix LPD1, page 100) sets out a total housing supply of 10,359 homes for the plan period, equivalent to 575 homes per year. This is a shortfall of 1,134 homes for the plan period, or 63 homes per year, against the Council’s *minimum* local housing need as calculated by the Government’s standard housing method, and already capped due to constraints in the south. There are no exceptional circumstances to justify this shortfall, so the Council should be asked to allocate more sites to help bridge the gap in the extent of its housing shortfall.
93. Crouchlands Farm is the obvious first choice as Rickman’s Green Village would provide up to 600 high-quality homes, of which up to 180 will be affordable housing and thus available at lower than market value.
94. Tables 6.16 and 6.23 of the Council’s Housing and Economic Development Needs Assessment (Appendix LPD2) show an estimated net need for 27 affordable rented homes and 19 affordable home ownership homes per annum in the North of the Plan Area.
95. Proposed Policy A15, Loxwood, proposes a minimum of 220 homes to come forward over the plan period, 30% of which will be affordable housing. This would provide, on average, 4 affordable homes per annum. Crouchlands Farm, however, could provide an additional 10 affordable homes per annum over the plan period, helping to better meet this need through planned (not windfall) supply.

96. Rickman's Green Village would therefore provide a predictable supply of new homes that will make a positive contribution towards meeting future housing (and affordable housing) need in the District, with first occupation anticipated in late 2025.
97. Artemis is currently engaged with a number of developers of both market and affordable housing regarding the delivery of all or part of Rickman's Green Village, for which there has been considerable interest. This further demonstrates Crouchlands Farm as the obvious and deliverable first choice site for the Council when it is asked to allocate more sites.

Size and scale

98. Crouchlands Farm was assessed in the Council's Housing and Economic Land Availability Assessment (Appendix LPD7, page 134) as being suitable, achievable and available for rural enterprise-led development / residential mix of up to 600 homes (HELAA ID HPI009).
99. However, the Council's Sustainability Appraisal (Appendix LPD5, page 35) questions the potential for 600 new homes at Crouchlands Farm to support a suitably comprehensive scheme, referencing the (now withdrawn) Government's Garden Communities Prospectus (Appendix LPD16). The Sustainability Appraisal (Appendix LPD5, page 35) goes on to identify a need to critically consider Crouchlands Farm against paragraph 73 of the National Planning Policy Framework (2021). This exercise is not then undertaken.
100. When undertaking this exercise (with our commentary in **bold**), it is clear that the allocation of Crouchlands Farm accords with the criteria:
- i) *"consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains"* – **Rickman's Green Village represents significant investment in infrastructure for the area, including provision for a new primary school and early years and special needs provision (or other suitable community facility⁴), and twice hourly bus service. The significant benefits are evidenced by Economic Impact Assessments submitted with the applications (Appendix RGV19, page 1, and RGV20, page 1), as well as documents demonstrating biodiversity net gain, alongside other environmental improvements (Appendices RGV14, page 4, RGV15, pages 2 – 3);**
 - ii) *"ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access"* - **Rickman's Green Village includes employment, retail, and leisure uses alongside provision for a new primary school and early years and special needs provision (or other suitable community facility) to contribute to a level of self-containment. The development itself provides various employment opportunities through the office and workspaces, shops, cafes and leisure facilities, the need of which are demonstrated in the**

⁴ We are seeking further input on this matter.

Operational Statement (Appendix RGV31) and Rural Enterprise Centre Report (Appendix RGV33). The Economic Impact Assessments (Appendices RGV19, page 1, and RGV20, page 1) supporting the Rickman’s Green Village applications outlines the impressive economic and social value benefits for the local area and the wider Chichester area, not just for future residents, but for the existing community too. For example, the proposed twice hourly bus service provides access to larger towns, via other villages in the area;

- iii) *“set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community”* – **the Design and Access Statements for Rickman’s Green Village applications (Appendices RGV3, pages 26 – 80, RGV4, pages 16 – 91, and RGV5, pages 12 – 111) set a clear design approach that provides high quality homes at a policy compliant mix, respectively;**
 - iv) *“make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)”* – **the Rickman’s Green Village applications are supported by a Deliverability Statement (Appendix RGV16), that set out how and when the homes would be delivered, and is consistent with timescales in the Council’s Five Year Housing Land Supply Review (Appendix LPD4, page 6). Artemis is also currently engaged with a number of developers regarding the delivery of all or part of Rickman’s Green Village, for which there has been considerable interest; and**
 - v) *“consider whether it is appropriate to establish green belt around or adjoining new developments of significant size”* – **this is not applicable to Crouchlands Farm as the site and surrounding area lies wholly outside of the green belt. There is also no green belt land in the entirety of Chichester District.**
101. In addition, previous work by DLBP (Appendix LPD17) shows that an allocation at Crouchlands Farm for Rickman’s Green Village will provide equivalent – or a betterment of - services and facilities than many other villages in West Sussex of a similar size. This includes settlements in Chichester District identified by the Council as ‘Service Villages’ in proposed Policies S1, Spatial Development Strategy (Appendix LPD1, page 38), and S2, Settlement Hierarchy (Appendix LPD1, page 42) as being suitable, sustainable, locations for growth.
102. The settlement of Loxwood is also identified by the Council as a Service Village, where proposed Policy A15, Loxwood (Appendix LPD1, page 260), seeks to deliver a minimum of 220 homes.
103. The Council therefore acknowledges that existing settlements, such as the Service Villages identified in the emerging Local Plan, of approximately 600 homes and with a limited range of services and facilities can be sustainable and accommodate future growth.

- I04. Rickman's Green Village is comparable in size (i.e., the number of homes) and the range of services and facilities (including, retail, employment, leisure, open space) it would provide so should be considered by the Council to be a sustainable settlement, much like the existing Service Villages.
- I05. Furthermore, Rickman's Green Village would also attract those from the surrounding area to make use of facilities not found more locally to them. The settlement, in fact, would serve a larger population those living at Rickman's Green Village alone, further reinforcing it as a sustainable new settlement suitable for allocation in the emerging Local Plan.

Transport and connectivity

- I06. The Council's Sustainability Appraisal (Appendix LPD5, page 36) states that the North of the Plan Area is rural and poorly connected to higher order settlements. Loxwood is then identified as having the best 'offer' in terms of services and facilities. However, bus services through Loxwood are extremely infrequent (i.e., less than once service in each direction per day).
- I07. In addition to the services and facilities at Rickman's Green Village, a new, twice-hourly bus service between Rickman's Green Village and Billingshurst would be provided, offering a link to the near town and thus connection to a range of facilities including a rail station and the opportunity to connect with an existing bus service for onward travel to Broadbridge Heath and Horsham (Appendix RGV32.2, pages 1 – 16).
- I08. This bus service would be used by both the population of Rickman's Green Village, improving the site's connectivity and sustainability, and those living in other nearby settlements along the bus route, greatly improving connectivity in the North of the Plan Area more generally.
- I09. In terms of Rickman's Green Village's impact on the capacity of the local highways network, proportionate and reasonable junction improvements will be made and secured through a s106 legal agreement, which would mitigate any limited impact⁵.
- I10. In addition, Rickman's Green Village would provide improvements to walking and existing cycling infrastructure which, combined with the public transport improvements, evidence Crouchlands Farm to be a well-connected and sustainable site suitable for allocation in the emerging Local Plan.

Landscape

- I11. Whilst Crouchlands Farm is not assessed in the Council's Landscape Capacity Study (Appendix LPD18), the Sustainability Appraisal (Appendix LPD5, page 38) makes the following observations (with our comments in **bold**):
- *“there may be fairly good potential to ensure containment within the landscape. However, there would still be a need for further work to ensure a comprehensive scheme that does not give rise to a risk of piecemeal development ‘creep’ over time, and the proposed development footprint would ideally be more nucleated, in order to minimise landscape impact” – we agree that there is good containment within*

⁵ The detailed design of the junction improvements is in progress.

the landscape. Views are localised and this is supported and reinforced by the landscape work supporting the applications for Rickman's Green Village (Appendices RGV28, pages 40 – 42, RGV29, page 70, and RGV30, page 70). Rickman's Green Village also makes use of the existing agricultural field pattern to ensure the rural character of the site is maintained, as well as protecting existing woodland and hedgerows (along the site boundaries and within the site itself), and proposing further treelines, which will prevent development 'creep';

- *“the location is notably rural, and it seems unlikely that there are significant views into or across the site from nearby high points in the landscape, such that the range of ‘sensitive receptors’, in terms of landscape impacts, is likely to be limited. However, issues are likely to include: traffic along Rickman’s Lane and the other two lanes linking to Ifold and Kirdford, along which there are attractive rural views and a number of listed buildings and other buildings with historic character” – we agree that landscape impacts are limited, as evidenced in the Landscape and Visual Impact Assessments supporting the applications for Rickman’s Green Village (Appendices RGV28, page 42, RGV29, page 70 and RGV30, page 70). There will be no direct impact on nearby listed buildings located on highways surrounding the site (Appendix RGV23, pages 2 – 4, RGV24, pages 2 – 3, and RGV25, pages 2 – 3). All attractive rural views will also be maintained (Appendix RGV28, page 42, RGV29, page 70 and RGV30, page 70). While rural in character, the surrounding roads are not protected and are designed to accommodate a greater number of vehicles, as evidenced in the transport work supporting the Rickman’s Green Village applications (Appendices RGV35, pages 65 – 66, RGV36, page 1, and RGV37, page 38); and*
- *“the 600 dwellings figure is based on 35 dwellings per hectare, which is quite a high density” – the 35 dwelling per hectare (dph) figure is an average for the Rickman’s Green Village site, but ranges from 29 dph for Phase 1 to 38 dph for Phase 2. A higher density is selected for certain parcels to optimise the use of land providing housing, green spaces and the critical mass to support the services and facilities at Rickman’s Green Village. This will still result in an attractive settlement with a characteristic village feel, as evidenced in the supporting Design and Access Statements (Appendix RGV3 – RGV5).*

112. The lack of landscape constraints associated with Rickman's Green Village, as evidenced by information supporting the three planning applications (Appendices RGV28, page 42, RGV29, page 70 and RGV30, page 70), demonstrates the suitability of Crouchlands Farm, in landscape terms, as an allocation for up to 600 homes in the emerging Local Plan.

Water Neutrality

113. The Council's Sustainability Assessment (Appendix LPD5) states that water neutrality remains a “key constraint to higher growth” (page 40) in the North of the Plan Area and discounts the highest growth scenario including Crouchlands Farm as it would exceed the number of homes (1,796 homes) accounted for in the Council's Water Neutrality Mitigation Strategy (Appendix LPD6).

114. However, growth scenarios 1a and 2a have been wrongly discounted in this regard as:
- the Water Neutrality Mitigation Strategy (Appendix LPD6, page 15, table 3.1) and the Sustainability Appraisal (Appendix LPD5, page 16), both confirm that the North of the Plan Area can accommodate 1,796 homes (circa 100 homes per year);
 - even when taking a precautionary approach, involving considering fewer homes in the North of the Plan Area by 5% (1,706 homes) or 10% (1,616 homes), almost the entirety of the actual shortfall (1,854 homes) could be reached in the North of the Plan Area; and
 - scenarios 1a (1,114 total homes) and 2a (1,514 total homes) would both be below the most precautionary approach taken to water neutrality constraint. And there would still be headroom.
115. The Sustainability Appraisal (Appendix LPD5) goes on to state that whilst a Mitigation Strategy has been agreed, it *“cannot be implemented until further work has been completed in order to design / set up strategic offsetting schemes. In this light, the proposed strategy of restricting growth somewhat [in the North of the Plan Area] supported”* (page 60).
116. That assessment is at odds, however, with proposed Policy NE17, Water Neutrality (Appendix LPD1, page 89), which states that *“Development proposals are not required to utilise the planning authority-led offsetting scheme and may bring forward their own offsetting schemes.”*
117. The Water Neutrality Reports (Appendix RGV38, page 18 – 20 and RGV39, page 17) supporting the Rickman’s Green Village applications confirm that water neutrality can be achieved at Crouchlands Farm, and that further details will be provided upon condition for the outline element.
118. The proposed water neutrality solution, which accords with the Council’s Mitigation Strategy (Appendix LPD6), is currently based on:
- i) maximising Water Efficiency to reduce demand;
 - ii) maximising Water Reuse through Hydroloops installed to each plot;
 - iii) maximising grey water harvesting with separate installation to each plot;
 - iv) utilising borehole abstraction for water demand; and
 - v) utilising water credits from offsetting through the WaterBank.

Heritage

119. The Council’s Sustainability Appraisal states that Crouchlands Farm is of *“relatively low sensitivity, from a historic environment perspective”* (Appendix LPD5, page 37).
120. Rickman’s Green Village would not be located within a Conservation Area and would result in no direct impacts to listed buildings. The supporting Heritage Statements (Appendix RGV23, pages 2 – 4, RGV24, pages 2 – 3, and RGV25, pages 2 – 3) identify the potential for Rickman’s Green Village to result in ‘less than substantial harm’ at the

lowest end of the scale, to the setting of a grade II listed building, Crouchland. This level of harm is not of the order that would outweigh the many public benefits of the proposal, including the provision of 600 homes.

121. The lack of heritage harm, and considerable public benefits, that would result from the development of Rickman’s Green Village at Crouchlands Farm further demonstrates why the site should be considered suitable as an additional allocation in the Council’s emerging Local Plan.

Ecology and trees

122. The Council’s Sustainability Appraisal identifies Crouchlands Farm as being “‘relatively unconstrained in several environmental respects’” (Appendix LPD5, page 34).
123. Rickman’s Green Village would provide improvements to existing protected and non-protected habitats, and the creation of new ones (Appendices RGV14, page and RGV15, pages 2 – 3). Rickman’s Green Village would also result in a net gain in biodiversity, known to be 45% for ‘Phase 1’ (Appendix RGV14, page 3).
124. Rickman’s Green Village would also be provided without any material impact to existing green infrastructure. To protect Ancient Woodland on site, a 15 metre buffer zone would be incorporated between existing woodland and the development, ensuring the arboricultural impact of the development at Crouchlands Farm to be low (Appendices RGV11, pages 2 – 3, RGV12, pages 2 – 3, and RGV13, page 2 – 3).
125. The benefits to ecology and trees resulting from Rickman’s Green Village demonstrate Crouchlands Farm to be a suitable and sustainable additional site allocation in the emerging Local Plan.
126. Figure 4, below, provides a summary of the Council’s assessment of Crouchlands Farm in the Sustainability Appraisal (Appendix LPD5), alongside counterevidence which supports the allocation of Crouchlands Farm as an additional allocated site.

Factor	Sustainability Appraisal Assessment	Supporting Evidence
Size and scale	<i>600 homes at Crouchlands Farm will be unable to support a suitably comprehensive scheme (Page 35)</i>	The Council’s Housing and Economic Land Availability Assessment (Appendix LPD7.5, page 134) assessed Crouchlands Farm as being suitable, achievable and available for rural enterprise-led development / residential mix of up to 600 homes. Previous work by DLBP (Appendix LPD17) shows that an allocation for Rickman’s Green Village at Crouchlands Farm will provide equivalent services and facilities to

		many other villages in West Sussex of a similar size.
Connectivity (transport)	<i>The North of the Plan Area is rural and poorly connected to higher order settlements (Page 36)</i>	The Bus Service Note (Appendix RGV32.2) provides details of the proposed transport improvements that would provide direct links to Billingshurst, and connections for onward travel to Broadbridge Heath and Horsham.
Landscape	<i>The proposed development footprint would ideally be more nucleated, in order to minimise landscape impact (page 38)</i>	The Design and Access Statements (Appendix RGV3 – RGV5) and Landscape and Visual Impact Assessments (Appendix RGV28 – RGV30) for the Rickman’s Green Village justifies how the proposal makes use of the existing agricultural field pattern to ensure the rural character of the site is maintained to minimise any potential landscape impacts.
	<i>Landscape impacts are likely to include traffic along Rickman’s Lane, along which there are attractive rural views and a number of listed buildings and other buildings with historic character (Page 38)</i>	The surrounding roads are not protected, and the Transport Assessments (Appendix RGV35 – RGV37) prepared for the Rickman’s Green Village applications demonstrates that greater numbers of vehicles can be accommodated.
	<i>The 600 dwellings figure is based on 35 dwellings per hectare, which is quite a high density (Page 38).</i>	The Design and Access Statements (Appendix RGV3 – RGV5) for the Rickman’s Green Village applications show how the higher density maximises the use of the land while providing a critical mass to support the services and facilities.
Water Neutrality	<i>Growth in the North of the Plan Area will be restricted until further work has been completed to design / set up strategic offsetting schemes (page 60).</i>	The Water Neutrality Reports (Appendices RGV38 and RGV39) supporting the Rickman’s Green Village applications confirm that water neutrality can be achieved for a development of up to 600

		homes and additional services and facilities at Crouchlands Farm.
Heritage	<i>Crouchlands is of relatively low sensitivity, from a historic environment perspective (Page 37).</i>	The Heritage Statements (Appendix RGV23 – RGV25) supporting the Rickman’s Green Village applications confirm the development of up to 600 homes and additional services and facilities at Crouchlands Farm would cause harm to the setting of a heritage asset at the lower end of the ‘less than substantial’ scale.
Ecology and trees	<i>Crouchlands is relatively unconstrained in several environmental respects (page 34)</i>	The Environmental Impact Assessment and Environmental Statements (Appendices RGV21 and RGV22) and Arboricultural Impact Assessments (Appendices RGV11 – RGV13) supporting the Rickman’s Green Village applications confirm the development of up to 600 homes and additional services and facilities at Crouchlands Farm would not be harmful in ecological and arboricultural terms.

Figure 4: Summary of Sustainability Appraisal assessment

D. LIST OF FIGURES AND APPENDICIES

List of figures

Figure 1: Appraisal of the North of the Plan Area reasonable growth scenarios

Figure 2: District context of Rickman's Green Village at Crouchlands Farm

Figure 3: Illustrative Masterplan of Rickman's Green Village

Figure 4: Summary of Sustainability Appraisal assessment

List of appendices⁶

Emerging Local Plan and evidence base, and relevant documents

- Appendix LPD1 – Chichester Local Plan 2021 – 2039: Proposed Submission (January 2023)
- Appendix LPD2 – Housing and Economic Development Needs Assessment (April 2022)
- Appendix LPD3 – Chichester Local Plan: Key Policies 2014-2029 (July 2015)
- Appendix LPD4 – Five Year Housing Land Supply Review (November 2022)
- Appendix LPD5 – Sustainability Appraisal (January 2023)
- Appendix LPD6 – Water Neutrality Study: Part C - Mitigation Strategy (December 2022)
- Appendix LPD7 – Housing and Economic Land Availability Assessment Appendix 3 Detailed Site Assessment Forms (March 2021)
- Appendix LPD8 – The Planning Inspectorate Chichester Local Plan Review Advisory Visit Note (July 2021)
- Appendix LPD9 – Local Plan Advisory Meeting Planning Inspectorate Note (October 2022)
- Appendix LPD10 – Sussex North Advisory Meeting on Water Neutrality Note (September 2022)
- Appendix LPD11 – Cabinet Public Reports Pack (January 2023)
- Appendix LPD12 – Five Year Housing Land Supply Position Statement (April 2022)

⁶ In the interests of conciseness, the appendices list is not exhaustive. For example, only a selection of the planning applications documents, or executive summaries of these, have been included. The planning applications are available on Chichester District Council's website, or a full suite of documents can be provided upon request.

- Appendix LPD13 – Interim Position Statement for Housing (November 2020)
- Appendix LPD14 – Appeal Decision Reference APP/L3815/W/22/3299268
- Appendix LPD15 – Cabinet Meeting Agenda Item 4: Chichester Local Plan 2021 – 2039: Proposed Submission (January 2023)
- Appendix LPD16 – Garden Communities Prospectus (August 2018)
- Appendix LPD17 – Settlement Capacity Study (January 2023)
- Appendix LPD18 – Landscape Capacity Study (March 2019)

Local Plan Engagement materials

- Appendix ENG1 – Letter Introducing Rickman’s Green Village To Senior Leadership Team
- Appendix ENG2 – Rickman’s Green Village Public Consultation Letter
- Appendix ENG3 – Rickman’s Green Village Proposed Allocation Information Pack
- Appendix ENG4 – Rickman’s Green Village Proposed Allocation Briefing Note
- Appendix ENG5 – Rickman’s Green Village Illustrative Masterplan
- Appendix ENG6 – Rickman’s Green Village Public Consultation Update
- Appendix ENG7 – Rickman’s Green Village Public Consultation Presentation Boards
- Appendix ENG8 – Rickman’s Green Village Proposed Landscape Strategy
- Appendix ENG9 – Rickman’s Green Village Bus Feasibility Note
- Appendix ENG10 – Letter To Senior Leadership Team Regarding Application

Rickman’s Green Village supporting evidence

- Appendix RGV1 – Whole Farm Plan Planning Statement
- Appendix RGV2 – Rickman’s Green Village Planning Statement
- Appendix RGV3 – Whole Farm Plan Design and Access Statement
- Appendix RGV4 – Rickman’s Green Village (full) Design and Access Statement
- Appendix RGV5 – Rickman’s Green Village (outline) Design and Access Statement
- Appendix RGV6 – Rickman’s Green Village Affordable Housing Statement
- Appendix RGV7 – Rickman’s Green Village Agricultural Land Classification Assessment (Executive Summary)
- Appendix RGV8 – Whole Farm Plan Air Quality Impact Assessment (Summary)

- Appendix RGV9 – Rickman’s Green Village (full) Air Quality Assessment (Summary)
- Appendix RGV10 – Rickman’s Green Village (outline) Air Quality Assessment (Summary)
- Appendix RGV11 – Whole Farm Plan Arboricultural Implications Report (Summary)
- Appendix RGV12 – Rickman’s Green Village (full) Arboricultural Implications Report (Summary)
- Appendix RGV13 – Rickman’s Green Village (outline) Arboricultural Implications Report (Summary)
- Appendix RGV14 – Rickman’s Green Village (full) Biodiversity Net Gain Assessment (Report Summary)
- Appendix RGV15 – Rickman’s Green Village (outline) Biodiversity Net Gain Assessment (Report Summary)
- Appendix RGV16 – Rickman’s Green Village Deliverability Statement
- Appendix RGV17 – Whole Farm Plan Ecological Impact Assessment (Report Summary)
- Appendix RGV18 – Rickman’s Green Village Ecological Impact Assessment (Report Summary)
- Appendix RGV19 – Whole Farm Plan Economic Impact Assessment (Executive Summary)
- Appendix RGV20 – Rickman’s Green Village Economic Impact and Social Value Assessment (Executive Summary)
- Appendix RGV21 – Whole Farm Plan Environmental Impact Assessment
- Appendix RGV22 – Rickman’s Green Village Environmental Statement
- Appendix RGV23 – Whole Farm Plan Heritage Statement (Summary and Conclusion)
- Appendix RGV24 – Rickman’s Green Village (full) Heritage Statement (Summary and Conclusion)
- Appendix RGV25 – Rickman’s Green Village (outline) Heritage Statement (Summary and Conclusion)
- Appendix RGV26 – Rickman’s Green Village (full) Land Quality Assessment (Conclusions and Recommendations)
- Appendix RGV27 – Rickman’s Green Village (outline) Land Quality Assessment
- Appendix RGV28 – Whole Farm Plan Landscape and Visual Impact Assessment (Summary and Mitigation Strategy)

- Appendix RGV29 – Rickman’s Green Village (full) Landscape and Visual Impact Assessment (Conclusion)
- Appendix RGV30 – Rickman’s Green Village (outline) Landscape and Visual Impact Assessment (Conclusion)
- Appendix RGV31 – Whole Farm Plan Operational Statement
- Appendix RGV32.1 – Rickman’s Green Village (outline) Residential Travel Plan (Executive Summary)
- Appendix RGV32.2 – Rickman’s Green Village (outline) Residential Travel Plan (Annex C)
- Appendix RGV33 – Whole Farm Plan Rural Enterprise Centre Report
- Appendix RGV34 – Rickman’s Green Village (outline) School Travel Plan (Executive Summary)
- Appendix RGV35 – Whole Farm Plan Transport Assessment (Summary and Conclusions)
- Appendix RGV36 Rickman’s Green Village (full) Transport Assessment (Executive Summary)
- Appendix RGV37 – Rickman’s Green Village (outline) Transport Assessment (Summary and Conclusions)
- Appendix RGV38 – Whole Farm Plan Water Neutrality Report
- Appendix RGV39 – Rickman’s Green Village (full) Water Neutrality Report
- Appendix RGV40 – Horsham District Council Response To Rickman’s Green Village Applications
- Appendix RGV41 – Waverley Borough Council Response To Rickman’s Green Village Applications
- Appendix RG42 – WSCC Education Response To Rickman’s Green Village Applications

Rickman’s Green Village Plans

- Appendix PLA1 – Allocation Location Plan
- Appendix PLA2 – Whole Farm Plan Site Location Plan
- Appendix PLA3 – Proposed Whole Farm Plan
- Appendix PLA4 – Phase I Site Location Plan
- Appendix PLA5 – Phase I Illustrative Masterplan
- Appendix PLA6 – Phase I Proposed Site Layout

- Appendix PLA7 – Phase 2 Site Location Plan
- Appendix PLA8 – Rickman’s Green Village Illustrative Masterplan (Option A)
- Appendix PLA9 – Rickman’s Green Village Framework Masterplan (Option B)
- Appendix PLA10 – Rickman’s Green Village Framework Masterplan (Option B)
- Appendix PLA11 – Axonometric View (Option A)