

**Representations to the
Chichester Local Plan
2021- 2039 Proposed
Submission**

Land at Champions Farm,
Wisborough Green

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On behalf of the Landowner

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1.0 [Introduction](#)

- 1.1 Southern Planning Practice Ltd are instructed by the landowner to submit representations to the Proposed Submission version of the Chichester Local Plan 2021- 2039, published in February 2023. Shorewood Homes, a local developer, have an interest in land at Champions Farm, Wisborough Green and are currently working collaboratively with the landowner.
- 1.2 The site is located to the south of Newpound Lane and to the north of Billingshurst Road (A272) in Wisborough Green. The site is located within the northern area of the district and is closely related to the main urban area of Billingshurst, which is located in the neighbouring authority Horsham District Council.
- 1.3 It is understood that the site has not been previously promoted through the Local Plan process. We can confirm on behalf of our client that the site is now available for development.
- 1.4 These representations set out responses in respect of land at Champions Farm, Wisborough Green, to the relevant policies and sections of the Proposed Submission Local Plan consultation document. In addition to the responses, the representations set out the opportunity presented by the site whilst demonstrating the site is available, suitably located and achievable, considered against the definitions contained in the NPPF (2021). The development of the site would also help to meet both Chichester's housing need and potentially the wider housing needs of Horsham and Crawley, given the site's close proximity to Horsham District in particular.
- 1.5 The following provides some background information to the site and the settlement of Wisborough Green for the Council's consideration.

Wisborough Green

- 1.6 Wisborough Green is a village with a population of approximately 1,400 people and is identified as one of the service villages within the settlement hierarchy of the Local Plan.

- 1.7 The village is located in the northern area of Chichester District and is connected by the A272 to Billingshurst which lies approximately 3.5km to the east of the site. Wisborough Green has a good range of local facilities and services including a primary school, village hall, sports pavilion, public house and cafe. The village is served by frequent bus services 64 and 69, which provide links to the surrounding villages, Billingshurst and other local centres which have a range of facilities, services and employment opportunities. The village is located outside of the South Downs National Park and is largely unconstrained.
- 1.8 It is acknowledged that historically given constraints on development in the area, the Local Plan has provided only limited growth to sustain existing communities in line with the settlement hierarchy. However, due to the constraints on the A27 in south of the district, the Local Plan has sought to provide moderate growth in the north to help make up the shortfall of dwellings. The Local Plan, as stated at paragraph 3.24, has considered higher levels of growth in Wisborough Green, and the service village has been identified to accommodate 75 dwellings over the plan period.

The Site

- 1.9 The site is located to the south of Newpound Lane and to the north of Billingshurst Road (A272) in the northern section of Chichester District. The site is located within the parish of Wisborough Green and is surrounded by existing residential development to the north, east, south and west of the site. The site is therefore very well located to existing residential development and is visually quite well contained.
- 1.10 The entire site extends to approximately 5.4 hectares and currently comprises mainly agricultural land with a residential property and agricultural buildings in the eastern section of the site. The following aerial plan details the location and extent of the site.



- 1.11 In the current context, and in terms of the current identified housing need in Wisborough Green, the section of the site outlined in red is considered to be the most appropriate for new residential development within the early years of this plan period. The area outlined in green is considered to be suitable for future development in the latter years of the plan period and beyond.
- 1.12 The land immediately to the south of Newpound Lane, outlined in red on the above plan, would be a logical extension to the existing residential development along Newpound Lane. New development on the site could be designed to reflect the layout of the properties immediately to the north of the site by mirroring the linear pattern which fronts Newpound Lane. The site is very accessible and is within very short walking distance of the school and other services and facilities within the village, making it a highly sustainable site for development.

- I.13 There are no known environmental or landscape designations or other constraints on the site which would limit the site's development.

- I.14 The site is a suitable location for new residential development adjacent to the existing residential development in the service village of Wisborough Green. It would constitute a logical, sustainable extension to the village and is available for development now.

- I.15 The landowner is keen to work collaboratively with the community to provide improvements to local facilities which would benefit both existing and future residents. Such benefits could include the provision of land for the primary school which could be used as a car park or playing field, the improvement of the pedestrian access along Newpound Lane which at present is not as safe as it could be and the potential widening of Newpound Lane to enable it to accommodate two way traffic.

2.0 [Response to Local Plan's Vision and Strategic Objectives \(Chapter 2\) and Spatial Strategy \(Chapter 3\)](#)

2.1 We are supportive of Chichester's vision set out on page 26 of the Consultation document. We strongly agree with the Council's priority to make available a variety of well designed, energy and water efficient low carbon homes to suit their incomes, needs, lifestyle and stage of life, in accessible locations close to existing or new services, meeting the needs of young people, families and older people.

2.2 To realise the element of the vision which states "*Enjoy a vibrant historic city, thriving towns and villages and areas of attractive, accessible and unspoilt harbours, coast and countryside*", the Council should look to all settlements and available land within the district in sustainable locations to help meet this vision. The Council must ensure that whilst the north area of the district is constrained, appropriate levels of growth are proposed to ensure villages thrive.

2.3 In order to have a robust five-year land supply, the council should look to all settlement tiers in the hierarchy to deliver homes through a range of small, medium, and strategic sites. Paragraph 69 of the NPPF acknowledges the important contribution which can be made by small and medium sized sites. By allocating a range of sites, the Council will be able to maintain a stable housing land supply enabling the delivery of homes throughout the plan period to meet the identified local requirements and to ensure they are not vulnerable to unsustainable, speculative development.

2.4 We agree that the 7 strategic objectives are all-encompassing. With regards to Strategic Objective 3, whilst we agree that the identified housing need should be met across the district up to the end of the plan period, we consider that in light of the contents of paragraph 60 of the NPPF, which refers to the Government's objective of significantly boosting the supply of homes, the Council should be more ambitious and plan for the objectively assessed housing need as a minimum. As per the Planning Practice Guidance (PPG) (Paragraph: 001 Reference ID: 68-001-20190722), the standard method for calculating local housing need provides a **minimum** (our emphasis) number of homes to be planned for. It clearly sets out that authorities should use the standard method as the starting point when preparing the

housing requirement in their plan unless exceptional circumstances justify an alternative approach. Whilst we appreciate there are constraints within the district including the South Downs National Park and the Area of Outstanding Natural Beauty, we do not believe that there are an exceptional circumstances which would justify an alternative approach in Chichester District, nor have the Council demonstrated such circumstances and we are disappointed to see that the Council is planning for a housing requirement below the need derived from the standard method, of 535 dpa in the southern plan area and a further 40 dpa in the northern plan area, a total supply of 10,350 dwellings over the plan period from 2021 – 2039.

- 2.5 Indeed, in order for the Proposed Submission Local Plan to meet the ‘positively prepared’ test of soundness as required by paragraph 35 a) of the National Planning Policy Framework (NPPF), the Local Plan Review must:

“provide (ing) a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”.

- 2.6 Whilst the constraints of the northern area of the district are appreciated, there are several sustainable sites, outside of the National Park and other constrained landscapes, which would assist Chichester to meet their identified housing needs. One such site is the land at Champions Farm in Wisborough Green. The western section of the site could be delivered in the short-medium term and the eastern section could be delivered in the longer term which would contribute to Chichester’s future housing supply.
- 2.7 Any new residential development on land at Champions Farm would contribute to the achievement of the 7 strategic objectives of the Local Plan and would also help to boost the housing supply in the short-medium term.

3.0 [Response to Local Plan Policies](#)

3.1 This section of the representations responds to Policies S1, S2, H1, H3 and A13 of the Local Plan Submission Version 2021-2039.

Policy S1

3.2 We are largely supportive of the Council's broad approach to providing sustainable development in the plan area over the plan period. Criterion 3 of Policy S1 sets out that where opportunities arise, new development will be provided to support the village and rural communities in the North of the plan area. We strongly support this approach to the provision of sustainable development and would like to highlight that the land at Champions Farm presents such an opportunity for development which would support and sustain the village of Wisborough Green.

3.3 Policy S1 sets out at criterion 6 that non-strategic provision is made for small-scale development in service villages where the proposals are consistent with the indicative housing numbers set out in Policy H3. This approach to providing sustainable development over the plan period is strongly supported and we believe that the land at Champions Farm would provide a suitable site which could be developed to provide low carbon, energy and water efficient homes which would contribute to the achievement of the strategic objectives of the Local Plan whilst fulfilling policy requirements and contributing to the council's housing land supply.

Policy S2

3.4 Policy S2 sets out the settlement hierarchy for the council to '*achieve its vision for the plan area, meet the scale of development required and enhance the quality of the built, natural, historic, social, and cultural environments, while sustaining the vitality of communities*'. Wisborough Green, as highlighted previously, is identified as a service village. This policy sets out that development requirements for service villages will be delivered through site allocations and

through windfall development in accordance with the relevant policies of the Local Plan. Whilst we are supportive of such an approach, to ensure the planning system is genuinely plan-led, in accordance with the requirements of Paragraph 15 of the NPPF, we would like to highlight that there is a clear need to provide small to medium site allocations within service villages. Particularly in the service village of Wisborough Green where a housing number of 75 dwellings has been identified.

Policy H1

- 3.5 Paragraph 11 of the National Planning Policy Framework (2021) states that Local Plans should positively seek opportunities to meet the development needs of their area - as a minimum – but also be sufficiently flexible to adapt to rapid change as well as any needs that cannot be met within neighbouring areas. This stance is also reiterated in the Planning Policy Guidance.
- 3.6 Policy H1 sets out that provision will be made of 10,359 homes in Chichester District from the period 1 April 2021 to 31 March 2039. This figure will provide 9 dwellings more than the housing requirement for the plan period which is 10,350 homes. Whilst we are supportive that the Local Plan is proposing to deliver more homes than the identified housing requirement, we understand that the housing requirement does not meet the housing need derived from the standard method. As such, we believe the policy should be revised to set out that the objectively assessed housing should be a **minimum** (our emphasis) figure in accordance with paragraph 11 b) of the National Planning Policy Framework and the Planning Practice Guidance.
- 3.7 The policy sets out that the housing supply will be delivered in three areas, namely the east-west corridor, manhood peninsula and the north of the plan area. The most homes, 8,717 homes, will be delivered in the east-west corridor which is the Local Plan's focus for growth. Only 679 homes will be delivered within the north of the plan area. Whilst it is appreciated that there are constraints to development within the north of the plan area, mainly relating to the countryside and landscape designations, the Council should ensure that an appropriate level of growth is being allocated to enable existing settlements and their services and facilities to be sustained and thrive. As such, the Local Plan should look to the sustainable

settlements within the north of the plan area to accommodate further development. Land at Champions Farm would provide a sustainable development within Wisborough Green, an unconstrained area within the district, which would make a meaningful contribution to housing delivery and provide additional footfall to help support existing facilities and services.

Policy H3

- 3.8 Policy H3 sets out that small-scale housing sites will be identified to help provide for the needs of local communities in accordance with the parish housing requirements. It confirms that suitable sites will be identified either through neighbourhood plans or subsequent development plan document. This policy identifies a housing requirement of 75 homes for the parish of Wisborough Green. It should be noted that this highest housing figure out of all the parishes in Chichester District where a strategic allocation/broad location for development is not identified.
- 3.9 Policy H3 highlights that if draft neighbourhood plans making provision for at least the minimum housing numbers of the relevant area have not made demonstrable progress the council will allocate sites for development within a development plan document in order to meet the requirements of this Local Plan. We are aware that the Wisborough Neighbourhood Plan is in the late stages of its review, a regulation 14 consultation took place in June 2021, however, there has been a long pause since this time. Whilst the Neighbourhood Plan seeks to allocate some sites for housing, the housing need figure is not specified, and the current proposed allocations would not provide the 75 dwellings which have been indicated. As such, we would encourage the Council to look to allocate the land at Champions Farm for development within the Local Plan, or at least as a development plan document in order to meet the requirements of this Local Plan and deliver the identified 75 homes in Wisborough Green. Further, it is considered that the Local Plan is being over reliant on the Neighbourhood Plan process, and the Development Plan should make provision for the identified housing requirement without the need to rely on Neighbourhood Plans bringing forward sites.

Policy A13

- 3.10 It is pertinent to note the number of site allocations which are being carried forward from the current Local Plan. Whilst it is understandable that some sites will be included within the Local Plan Review, as they may have been forecast to be in the later years of the currently adopted Local Plan period, it is slightly concerning that one of the main strategic allocations, Southbourne, is being carried forward together with several other site allocations.
- 3.11 The Southbourne allocation has been talked of for some time, however it has not yet come to fruition. The new allocation has significantly increased housing numbers since the current Local Plan policy and is too vague in its current form. It is impossible to deduce how the figure of 1,050 dwellings is arrived at. There is a reliance on sites coming forward within this broad allocation, however there is no guarantee of this even over the later stages of the plan. The identification of sites as Broad Locations does not guarantee that they will be released for housing. There should be a reasonable prospect that the site is available and could be viably developed. If the development comes forward in a piecemeal way this could impact on affordable housing provision.
- 3.12 Paragraph 017 Reference ID: 3-017-20190722 of the Planning Practice Guidance states that: *Plan-makers will need to assess the suitability, availability, and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period.*
- 3.13 There is no indication within the Local Plan Submission Version that the authority has undertaken the exercise required by the Planning Practice Guidance and neither does there appear to a sustainability appraisal for the site. In addition, these 1,050 dwellings would not be available, if at all, until later in the plan however Chichester have a significant shortfall at present and cannot demonstrate a 5 year housing land supply at the time of writing these representations.

- 3.14 We consider that the council should be less reliant on major strategic allocations and look to allocate a range of additional small, medium, and large sites to provide a more flexible, responsive, and deliverable range of allocations. As recognised above, such an approach is encouraged at Paragraph 69 of the National Planning Policy Framework which acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.
- 3.15 By allocating more sites for housing development, the Council will bolster their housing land supply. Through the allocation of more sustainable sites in service villages, the Council will provide support for the rural, northern area of the district. We therefore encourage the Council to review their site allocations in line with their spatial strategy and together with the policy requirements of Policy H3 to ensure they are planning for the right homes in the right places over the plan period and beyond.

4.0 [Conclusion](#)

- 4.1 It is pertinent to note paragraph 16 of the NPPF which makes it clear that plans should be prepared in a way that is aspirational but deliverable.
- 4.2 As currently drafted, the emerging Local Plan is not positively prepared and is unlikely to assist the Government in its objective to significant boost the supply of new homes as it carries forward previous allocations which have failed to deliver and proposes new allocations which also may not deliver new homes or take a long time to provide new homes when the need is now. If the allocations did not come forward in the previous Local Plan period, it is questioned whether they will come forward in the next plan period.
- 4.3 Further, the Local Plan, as currently drafted, does not plan for the housing need derived from the standard method and therefore whilst the housing requirement set out in the Local Plan appears to be ‘met’, this requirement is artificially low and there will be unmet need arising from the district as a result. It is acknowledged that most of the neighbouring authorities are faced with similar constraints and are unable to assist as they have their own unmet needs. As such, contributing to the current housing crisis.
- 4.4 To seek to remedy this deficiency, it is considered that the council should allocate further sites of varying size to provide a flexible, responsive, and deliverable housing land supply. In this respect, we would point out the suitability of the land at Champions Farm, Wisborough Green.
- 4.5 In accordance with the definition of ‘deliverable’ within the National Planning Policy Framework (2021), the land at Champions Farm is available for development now, it is a suitable and sustainable location for future residential development, and it is achievable with a realistic prospect that housing will be delivered on site within five years following its allocation.
- 4.6 The site could be delivered to provide a landscape-led development which would integrate well with the existing surrounding residential development in the village.

4.7 In conclusion, as demonstrated throughout these representations, the land at Champions Farm is available, suitable, and achievable and would make a positive contribution to help meet Chichester's housing need, in particular the housing need for the north of the district.