



15 March 2023

John P Heaver  
[john@jhfarming.co.uk](mailto:john@jhfarming.co.uk)  
01243 575 555

Chichester District Council  
Planning Policy  
East Pallant House  
Chichester  
West Sussex  
PO19 1TY

22 Chancery Lane  
London  
WC2A 1LS

Dear Sir or Madam

**Response to Chichester Local Plan 2021-2039 – Proposed Submission Stage Consultation (Regulation 19)**

**Land at Broadbridge, Chichester**

**1. Introduction**

We write in response to the consultation on the Chichester Local Plan 2021-2039 Proposed Submission (2023) document.

The Heaver family have been active in Bosham since the 18<sup>th</sup> Century, owning and operating a number of large-scale businesses in West Sussex and particularly in the Chichester area that have supported substantial local employment. In 1860 they acquired land in Bosham and this remains in agricultural use. Heaver Homes is promoting a part of this land located north of Broadbridge comprising Mudberry and Knapp Farms for a residential-led new settlement to help meet the needs of Chichester and to address long-standing infrastructure constraints.

**2. Site and Surrounding Area**

These representations relate specifically to the land shown below which is located between the A27 and the Nutbourne to Chichester railway line. The Site extends to circa 163 hectares.

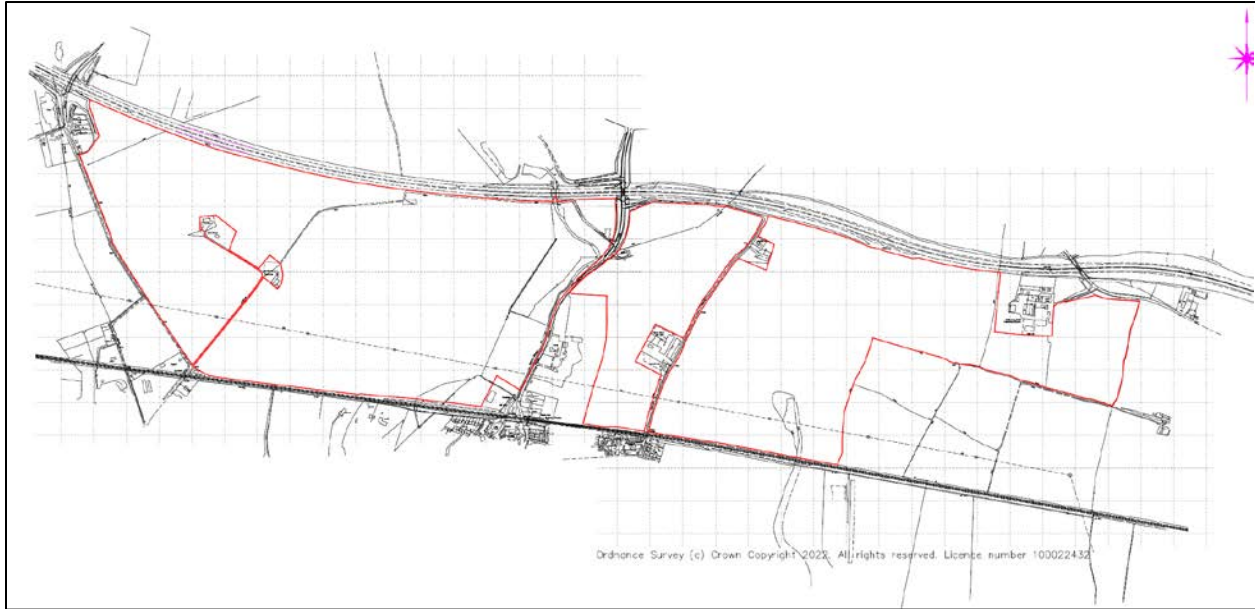


Figure 1: Site location plan

The Site is located to the west of Chichester and Fishbourne and to the north of Bosham. To the east of the Site is agricultural land, beyond which is Nutbourne and to the north of the Site is the A27, beyond which is the village of Funtington.

### 3. Chichester Local Plan 2021-2039 Proposed Submission

Paragraphs 5.1-5.2 of the Proposed Submission plan sets out the plan's approach to addressing housing need. The objectively assessed housing need for the district is stated to be 638 dwellings per annum (dpa), plus an allowance for accommodating unmet need arising from the Chichester district part of the South Downs National Park. The plan does not look to meet this need in full, as the capacity of the A27 is considered a limiting factor. Instead, the plan looks to deliver 575dpa (535 in the southern plan area, 40 in the northern plan area).

This approach is directly contrary to national planning policy. Paragraph 11 of the National Planning Policy Framework (NPPF) states that *"all plans should promote a sustainable pattern of development that seeks to: meet the needs of their area..."* Strategic policies are required – as a minimum – to provide for objectively assessed housing needs. This is unless there is a strong reason for restricting the scale of development or the adverse impacts of meeting need would demonstrably outweigh the benefits. In other words, the NPPF places a very strong emphasis on meeting housing need. This is reinforced at paragraph 60 which confirms that it is Government policy to significantly boost the supply of homes.

The failure to plan for sufficient housing growth to meet identified needs may be justified by infrastructure constraints. However, in circumstances where a Local Plan's growth ambitions fall short of identified need,



the Planning Practice Guidance (PPG) states that a review may be required earlier than the statutory minimum of five years:

*There will be occasions where there are significant changes in circumstances which may mean it is necessary to review the relevant strategic policies earlier than the statutory minimum of 5 years, for example, where new cross-boundary matters arise. Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, **on the basis of a number that is significantly below the number generated using the standard method**, or has been subject to a cap where the plan has been adopted using the standard method. This is to ensure that all housing need is planned for as quickly as reasonably possible.<sup>1</sup> (Our emphasis.)*

The Proposed Submission plan makes no commitment to such an early review. Instead, it identifies the West Sussex and Greater Brighton Strategic Planning Board as a potential forum for addressing future housing growth, noting that this “*may provide a strategic context in which to plan for the district’s future after 2039...<sup>2</sup>*” The plan also suggests that the Council will “*continue to work bilaterally with neighbouring authorities in seeking to find cross boundary strategic solutions to future growth requirements.*”

This is insufficient to address the very serious issue of unmet housing need. The West Sussex and Greater Brighton Strategic Planning Board does not appear to be active – it published its Local Strategic Statement in January 2016 and there are no minutes of any meetings since July 2016. It does not appear likely to address the urgent issue of unmet housing need. With regard to the council’s commitment to work with neighbouring authorities, paragraph 5.3 of the Proposed Submission plan confirms that such discussions (under the Duty to Cooperate) have only confirmed that those authorities are unable to help. It is disingenuous to then claim that further discussions might lead to a solution.

The PPG is specific in stating that where a plan is adopted on the basis of planned housing growth that is significantly below the standard method-generated number, a review earlier than five years is warranted. This is exactly the situation that would arise should the Proposed Submission plan be adopted. It follows that the plan should include a firm commitment to a review earlier than five years. We suggest that a review should be completed within three years of the plan’s adoption.

Furthermore, given the emphasis that the NPPF places on meeting needs in full and significantly boosting housing growth, the implications of the plan’s failure to meet the development needs of the area must be fully understood. Specifically, that unmet housing need will increase, housing affordability issues will increase, mobility of labour will be restricted and consequently economic activity and economic growth in the area will be harmed.

It is thereby of paramount importance that alongside the spatial strategy set out in the emerging Local Plan a solution to the infrastructure constraints affecting the district is successfully identified as soon as possible. The infrastructure constraints must be unlocked to ensure the future success and prosperity of the district for the benefit of existing and new residents, current and future generations.

---

<sup>1</sup> PPG Plan-making, paragraph 062, reference ID: 062-20190315

<sup>2</sup> Paragraph 5.13.



## **Soundness**

Paragraph 35 of the NPPF sets out the requirements of Local Plans if they are to be considered “sound”. These requirements include the need to be consistent with national policy. For the reasons set out above, Heaver Homes has concerns about the Proposed Submission plan, specifically its lack of commitment to an early review. Without this commitment, the plan would be inconsistent with national policy and therefore unsound.

**Heaver Homes recommends that the plan is amended to include a firm commitment to an early review and that that review should include exploration of high-growth options that might address existing infrastructure constraints and the growing unmet housing need.**

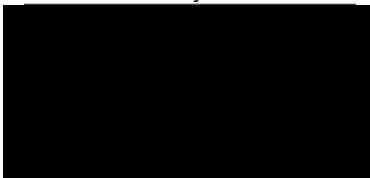
## **4. The Opportunity at Broadbridge**

A review of the strategy for meeting housing needs should consider the opportunity that exists at Broadbridge. The site has an enviable strategic location, connectivity (including access to a railway station) and limited environmental constraints. Heaver Homes have identified an opportunity to create a new and distinguished settlement that will transform Broadbridge into a unique and thriving community, carefully planned and designed to create a distinct sense of place. A sustainable, and well-balanced community that caters for the needs of all its residents. A landscape-led scheme which prioritises enduring and thoughtful design, with a focus on public open spaces that complement and enhance the natural surroundings.

Having identified the opportunity to create a new community at Broadbridge, Heaver Homes appointed a team of specialists to explore the opportunity further and promote the site through the Regulation 18 consultation. This included an overall vision and a well-considered concept masterplan for the site. That vision is for a balanced community that could meet the needs of both new and existing residents, with access to local schooling and employment opportunities in line with the Heavers' history and ancestral legacy in Bosham and Chichester. The masterplan identified an opportunity to create a settlement with a diverse mix of character ranging from open parklands to rural settlements and a mix of uses including schools, shops, cafes, civic spaces, and a range of business premises.

The potential of Broadbridge is explored in greater depth in the Broadbridge Development Potential note prepared by development specialists Turnberry (appended to these representations). An early review of the Local Plan would allow the Broadbridge opportunity to be fully considered at a strategic and technical level and it's potential for addressing Chichester's very serious housing and infrastructure issues to be assessed.

Yours sincerely



**John P Heaver, MRICS**  
**Director**

Enc: Broadbridge Development Potential