
Representation on the Chichester District Council Draft Local Plan

Land East of St Peter's Church, Wisborough Green

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1. Introduction

- 1.1. On behalf of our client, Millwood Designer Homes, Savills is responding to the Chichester District Council (CDC) Draft Local Plan Preferred Approach, Regulation 18 Consultation, published December 2018.
- 1.2. This representation concentrates mainly on Land East of St Peter's Church, Wisborough Green, which was assessed within the Housing and Economic Land Availability Assessment (HELAA), published August 2018 (Ref: HWG0011). The HELAA concluded that the site was achievable for a residential development of 20 units, however given the site area of approximately 1.9ha, Millwood Designer Homes believes a development of 30-40 dwellings (at 20-30 dwellings per hectare (dph)), would be more appropriate for the site, as submitted through their 2018 Call for Sites form.
- 1.3. For plan making the Government, through the revised 2018 National Planning Policy Framework (NPPF), requires Local Planning Authorities to plan positively to seek opportunities to meet the development needs of the area, and be sufficiently flexibility to adapt to rapid change (Paragraph 11(a)).

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- 1.4. These representations are submitted in respect of Millwood Designer Homes' interests on Land East of St Peter's Church, to the east of Wisborough Green, which is shown in Appendix 1. The site currently comprises agricultural fields, is bounded to the north east and west by public footpaths, and is located in a predominantly residential part of the settlement.
- 1.5. Access would be afforded to the site from the south, and the current Public Rights of Way which form the majority of the site boundaries would be retained, and where possible incorporated into a proposed development.
- 1.6. It is recognised that the Listed church, located to the west of the site, is an important asset for the Local Community, and its protection and conservation would therefore form part of a development proposal at the site. This would include a landscape buffer along the western boundary of the site to frame the church, and to ensure that dwellings were stepped back from its site boundary.
- 1.7. The land immediately to the north of the church which also forms part of the proposed site area would not be developed, but instead would form an area of public open space. This would allow both new and existing residents to enjoy the setting and views of the church, and would provide an area of recreation and dog walking, which many people currently utilise the existing public rights of way for. This area of open space, along with the proposed landscape buffer, would provide a larger area of green infrastructure that would normally be required for a development of this size. However this commitment from Millwood represents the important local characteristics of the area, and the wish to provide a development which fits comfortably into the surrounding area.

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2. Draft Local Plan Policies

Overall Housing Provision

- 2.1. Within the Preferred Approach Local Plan, Chichester District Council (CDC) have set out the housing provision across the plan period (2016-2035) within Draft Policy S4 and the supporting text.
- 2.2. This states that the Plan will make provision for an additional 12,350 dwellings over the plan period, equating to 650 dwellings per annum (dpa). According to the supporting text for the policy, this equates to the identified objectively assessed housing needs for the plan area, plus an allowance for accommodating unmet need arising from the Chichester District of the South Downs National Park.
- 2.3. The newly adopted standard methodology for Objectively Assessed Need (OAN) published by the Government states a requirement for Chichester of 609 dpa.
- 2.4. It is therefore recognised that the current Preferred Approach Plan seeks to accommodate more growth than this, however this uplift is not sufficient to cover the unmet need from neighbouring authorities such as the South Downs National Park Authority (SDNPA) which has calculated an unmet need of 81 dpa for that part of Chichester District which falls within the National Park, or East Hampshire District Council which is currently proposing a housing policy equating to approximately 550 dpa (508.2 dpa from 2017 to 2028, and 608.2 dpa from 2028 to 2036), which is significantly lower than the standardised methodology OAN for EHDC of 617 dpa.
- 2.5. However, unmet need is not the only consideration for an uplift to the OAN. The September 2017 consultation, 'Planning for the Right Homes in the Right Places', published by the Government, notes that some LPA's may see a reduction in their housing needs compared to the existing approach, and this can be attributed to the proposed standardised methodology not making a specific adjustment to take account of anticipated employment growth.
- 2.6. The Preferred Approach Local Plan contains 15 strategic allocations, which contain at least 26ha of proposed employment land (Use Classes B1, B2 and B8). This indicates a significant amount of employment growth in the plan, however this is not reflected in a subsequent uplift of the figures in Draft Policy S4.
- 2.7. The housing policies are therefore not positively prepared and would not be found sound at Examination. It is recommended that an additional uplift is included in the housing policies to ensure that unmet need from neighbouring authorities is met, and that the employment growth contained within the plan is accommodated for.

Wisborough Green

- 2.8. Draft Policy S2 states that Wisborough Green is classified as a Service Village, with the supporting text stating that in principle they are suitable places to accommodate new housing. Millwood Designer Homes support this policy, and the designation of Wisborough Green as a Service Village.

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- 2.9. However, the settlement hierarchy contained within Draft Policy S2 does not appear to have informed Draft Policy S5 which details the Parish Housing Requirements 2016-2035, particularly in relation to Wisborough Green.
- 2.10. Wisborough Green in Draft Local Plan Policy S5 has been allocated a figure of 25 new residential dwellings to be found across the plan period, either through neighbourhood plans or subsequent development plan documents, however this appears too low, especially in relation to the similar settlement of Loxwood, which has been allocated 125 dwellings.
- 2.11. The supporting text for Draft Policy S19 states that the North of the Plan Area, within which Wisborough Green lies, is predominantly rural with few sizeable settlements, *“however there is an identified need to accommodate some development to address local housing and employment needs, and to support local village facilities”* (emphasis added)(Paragraph 4.128).
- 2.12. It is not felt that the 25 dwellings (a mere 0.2% of the overall Plan Provision) within Wisborough Green is sufficient to address local housing need within the village, or to support local village facilities. Over the plan period of 19 years this equates to just over one new dwelling per year. In accordance with National Planning Policy this does not appear to be positively planning for the needs of the area.
- 2.13. The housing needs of the North of the Plan Area, and Wisborough Green, are addressed within the Chichester Housing and Economic Development Needs Assessment (January 2018). This states:
- “The Plan Area (North) is a largely rural area and there is very little housing being advertised for sale. Of the 63 homes being advertised on Rightmove, only 7 were less than £500,000. There was a predominance of larger detached properties”* [Paragraph 5.146]
- “Wisborough Green commands a premium (compared to Ifold) as it is seen as a classic Sussex Village offering the rural idyll. This village is also very close to Billingshurst which attracts more commuters to the village”* [Paragraph 5.150]
- 2.14. The affordability ratio in Chichester is 13.49 (published by the ONS in 2017), which is significantly higher than the national average of 9.06. Therefore there is clear demand for dwellings within this District. Additionally, the information contained within the Needs Assessment indicates that Wisborough Green and the North Area of the District are particularly un-affordable areas, with limited sales of houses and very expensive dwellings.
- 2.15. If only 25 dwellings are to be provided in Wisborough Green over the next 19 years this affordability is highly likely to worsen further.
- 2.16. This is therefore clear evidence that there is demand for new dwellings within Wisborough Green, however this does not appear to have been demonstrated within the housing allocations of the emerging Local Plan.
- 2.17. As stated, the settlement of Loxwood has been allocated growth of 125 units over the Plan Period, compared with only 25 in Wisborough Green. It is unclear why there is such a difference between the two settlements.

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- 2.18. Both have been categorised as Service Villages within the Settlement Hierarchy, contained within Draft Policy S2. There is no clear evidence provided by the Council why the settlements would therefore not have a similar housing number, for example this difference is not discussed within the published Sustainability Appraisal (SA) or the Needs Assessment.
- 2.19. The SA states that this Draft Local Plan provides a 'refresh' to the existing adopted Local Plan, therefore meaning that some of the evidence base is still relevant. In 2013 CDC published a Settlement Capacity Profile which was used to inform the settlement hierarchy and allocations. This document demonstrates that Wisborough Green and Loxwood are almost identical in relation to many of the characteristics of each area:

Most recent data (2011)		Wisborough Green	Loxwood
Current Population		1,414	1,480
Number of Households		601	608
Average Household Size		2.35	2.43
Number of Dwellings		636	628
Single Person Households		160	136
Economically Active Residents		1,029	1,069
Household Tenure	Owner Occupier	75%	81%
	Social Rented	10%	10%
Parish Local Housing Need		35	25

- 2.20. Based on these statistics, including the size of each Parish Area there is no indication why Loxwood is suitable for 125 dwellings, whereas Wisborough Green is only suitable for 25 dwellings, five times less.
- 2.21. This document also sets out that there is a higher Parish local housing need in Wisborough Green than in Loxwood. This was also recognised within the adopted Wisborough Green Neighbourhood Plan, which stated that in 2014, when the plan was being prepared, there were 26 households with a local connection to the Parish on the Housing Register.
- 2.22. If only 25 dwellings are to be provided in Wisborough Green over the plan period this only equates to a maximum of 8 affordable dwellings (assuming 30% on-site provision). This would not be sufficient to provide for even a quarter of the Parish Local Housing Need. However, Loxwood, with a higher housing policy of 125 dwellings, could see up to 38 affordable dwellings. Given that Wisborough Green has a higher local housing need than Loxwood it does not appear that this has been taken into account by CDC during the preparation of Policy S5.

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- 2.23. If Loxwood can be seen as a sustainable location to accommodate 125 dwellings over the Plan period, Wisborough Green should also be seen as a sustainable location. Indeed given that achieving sustainable development still remains at the heart of the 2018 NPPF, this does not appear to be positively prepared to provide a sufficient number of dwellings in Wisborough Green, to allow for the settlement to grow over the life of the Plan, and to ensure that sufficient choice and competition in the market exists in a way to seek to reduce the poor affordability of the area.
- 2.24. Overall Millwood seek to object to the housing numbers proposed at Wisborough Green as these are too low compared with the affordability of the area, and the housing numbers in similar settlements such as Loxwood. It is therefore recommended that the housing figures for Wisborough Green are increased to a more sustainable figure, reflecting positive planning within the area.

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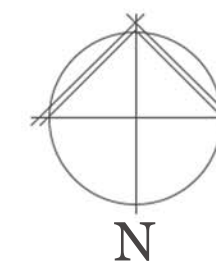


Appendix 1 Land East of St Peter's Church – Indicative Site Layout

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Wisborough Green Site Plan

0m 30m

Drawn: Sep '18 By: FC
Scale: 1:1000 Original: A2
Rev: -

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