

Policy H3 Non-Strategic Parish Housing Requirements 2021 – 2039

Wisborough Green strongly objects to this Policy and believes that it is unsound for the following reasons:

Justification of Housing Allocation

As we have indicated elsewhere Wisborough Green Parish Council (WGPC) acknowledges that Chichester District Council (CDC) has given the Local Plan considerable thought and we support the principles that it proposes being applied to housing distribution. However, we do not consider that the allocation of 75 homes to Wisborough Green (WG) is justified when those principles are then applied. **We therefore consider this policy to be unsound.**

It is clear from the evidence base for the Plan that the area to the south of the district adjacent to Chichester City, the Manhood Peninsula and the East-West Corridor is the most sustainable location for new development. The A27 is placing constraints on development in this area, but the fact that development cannot be accommodated here does not mean that the north-east of the district becomes more suitable for development. Each area must be judged according to its own circumstances. The draft plan does not explain why CDC has increased the number of homes allocated to the northern area except to say, in summary, that if they cannot go in the south then they must go in the north. There is no justification for such an approach, either in general terms, or on the basis of the criteria for selecting development sites contained within the draft Local Plan.

The draft Local Plan is explicit that the northern part of the plan area would not normally be identified for higher levels of growth. We agree with this statement but we do not agree that CDC needs to override this judgement and allocate higher numbers to the northern parishes. We draw attention to the content of the draft NPPF which the Government proposes to introduce later this year which makes clear that meeting full housing need does not override the need to ensure that local character and sustainability are respected.

It is our view that the 'correct' numbers for Wisborough Green, applying CDC's own criteria, would be 25, or possibly 40. These were the numbers proposed at Regulation 18 stage. It appears to us that housing numbers have been allocated to Wisborough Green because one or more sites have been promoted through the HELAA rather than because there is an, in principle, justification for the allocation of 75 dwellings.

Unsustainable Growth

The existing WG Neighbourhood Plan (NP) allows for 60+ houses in 15 years within WG village, an increase of over 10% on the 601 base (2011 Census). Proposals under consideration are growth of a greater magnitude again, more than double the numbers

previously allocated. In practical terms, this represents 25-30% growth in what could be only a decade from the original made WG NP.

Growth of this, particularly, high scale is, in and of itself, unsustainable and would substantially urbanise the rural character of the village. It would also cause harm to the essentially rural character of the village both physically and for the community. Indeed, WG is a jewel in the West Sussex firmament and the CDC approach in the draft LP is solely a quantitative exercise that ignores the qualitative aspects of destroying the inherent character of an, increasingly rare, quintessential, historic English village.

The 'Sustainability Appraisal Report Appendix V - Parish Scenarios' defines three growth scenarios for villages in the NE plan area, including WG. The evidence and calculations defining the selected 'middle growth' scenario are, at best, weak and fail to demonstrate sound thinking.

The proposal appears to be 'just a number' and assumes the middle growth scenario is achieved by increasing the figure within the draft WG NP (2021) from 40 to 75 by increasing site HWG004 from 10 to 40. In the same section CDC acknowledge that this level of development on this same site had been rejected by a Planning Inspector at Appeal. Not only is the maths incorrect but the proposal is based on overturning an unambiguous Planning Appeal decision.

Given that the 'high growth' scenarios have been discarded as unworkable, it is apparent that the proposed 'middle growth' scenario chosen is at best an approximate guess on what can hopefully be achievable if other policies of the draft LP are ignored. It appears based solely on HELAA data which lacks the rigour and local knowledge exercised within the NP evaluation process and already undertaken.

Policy H3 advocates each village setting its own growth allocation plan. Further, the report asserts 'it is difficult to envisage the potential for further strategic growth' beyond previously identified sites.

Land Availability

WGPC is of the opinion that CDC's draft LP seems to turn the focus of development in Service Villages to land availability and/or opportunity from what is sustainable and right. Villages should adapt and grow but to be successful this has to be sustainable – both in scale in relation to community size as well as in relation to infrastructure restraints. The draft LP makes no attempt to demonstrate why an opportunistic approach outweighs all other consideration.

Landscape Capacity

The evidence base for the LP Review includes the Landscape Capacity Study that addresses WG and the NE parishes area. The assessment therein, for WG, correctly determines the **sensitivity** to be '**High**' and the **capacity for development** '**Low**'; specific conclusions assert that there is limited scope for development outside the existing Settlement Area. The report provides a clear indication that high scale growth would involve a loss of important rural

landscape and countryside; whilst defining 'high scale' is subjective, development that repeatedly adds double-digit increases of housing numbers should qualify.

As acknowledged within the draft LP, 'Green Gaps' are critically important within a rural environment. WGPC commissioned a Strategic Environmental Assessment which it submits as evidence, as well as a Local Green Gap Review by the NP Steering Group, validated by AECOM. These studies confirm the importance of green spaces and landscape views, which in turn restrict capacity for development. The full reports are available in the WGPC evidence base:

https://www.wisboroughgreen.org/wp-content/uploads/2021/04/Wisborough-Green-NP-SEA-ER_v2.0_270421-Final.pdf

<https://www.wisboroughgreen.org/neighbourhood-plan-review-2019/>

The scale of growth being considered within the Local Plan is not sustainable in terms of Landscape Capacity.

Neighbourhood Plan

WGPC has prepared a reviewed NP.

In Autumn 2018, CDC advised that the Regulation 14 consultation for a revised NP must be started by January 2020 if the village was to allocate sites. Despite the tight timetable for a volunteer group to complete, the process was started and the work substantially completed before CDC implemented a delay; CDC provided little information or support. CDC set WG's original housing allocation at 25, this was increased to 40 in November 2020, before being increased to 75 in January 2023.

Whilst WGPC was undertaking its review of the NP, **WG village residents** selected sites for the housing allocation of 40 dwellings that respect the setting, form and character of the settlement (in the event, 48 houses could be accommodated). In seeking to allocate 75 houses to WG, CDC's draft Local Plan has offered no evidence to support this housing number and appears to be solely based upon sites identified within the HELAA. WGPC reiterate that the HELAA has failed to draw upon the detailed assessments undertaken as part of the NP process.

By way of example, on top of the failure on site HWG0004, sites identified in the HELAA shows development potential on Glebe Fields (HWG0011); these fields are in the setting of the historic 12th century Grade 1 Listed Church, would have a devastating impact on the landscape character and rural setting of the church and goes against the visceral opposition to development on these fields of both WGPC and WG. WGPC commissioned a study to demonstrate the historical significance of the area, available in the NP evidence.

<https://www.wisboroughgreen.org/neighbourhood-plan-review-2019/>

The preparation of the revision to the WG NP has shown that development of 75 dwellings is unsustainable in the village and will have a permanent detrimental impact upon the village, contrary to Local Plan objectives and riding roughshod over the volunteers' work in preparation of the updated NP.

Water Neutrality

Water is a finite resource and levels of abstraction associated with new development have led to the designation of the West Sussex North Water Resource Zone.

The Water Neutrality Strategy relies upon untested and unproven methodology, to draw conclusions as to its efficacy is, at best, questionable. Should a plan be built on this? WGPC holds serious concerns that the proposed level of development in the WS North Water Resource Zone, across the different Local Authority areas, will struggle despite the Water Neutrality Strategy. The allocation of higher numbers of houses to Wisborough Green depends for its delivery on compliance with extremely strict requirements which are in no way guaranteed. It is essential that the least possible additional water stress is placed on the area.

It is likely that there will be significant additional demand for water above existing levels and that offsetting this additional demand against existing supplies will prove harder, if not impossible. If the OIS fails to work any new development in the NE area will have a negative effect on existing homeowners.

WGPC is concerned that the Local Plan relies upon an HRA and Environmental Assessment undertaken in 2019 when the allocations to the NE parishes were substantially (47% less) smaller. When the Planning Inspector asked CDC 'for no stones to be left unturned' in seeking additional housing sites, was he/she made aware of the water neutrality implications in the NE area? The water situation has deteriorated since the 2019 study, not least as a result of development completed and occupied.

Cross Border Consideration

WG is located at the edge of the CDC area and is directly adjacent to the large, and rapidly expanding, settlement of Billingshurst, within Horsham District. Horsham District Council plans demonstrate development advancing towards the WG boundary along the Arun River, and there is the likely prospect of many hundreds of additional houses. Additional proposed major developments nearby at Dunsfold, in Waverley BC, Surrey, will add incremental pressure to infrastructure local to WG.

Development in WG will aggregate with the growth of Billingshurst, and other local areas, and should be assessed together, especially with regard to all aspects of infrastructure.

WGPC does not believe that spatial planning issues across local authority boundaries are being correctly considered: WG residents use facilities in Billingshurst which are already under pressure from development in Billingshurst as well as Broadbridge Heath, to the north. Further, incremental gains in WG, a sensitive rural village appear pointless set against the vast developments over the village boundary – poor coordination?

The justification for developing Loxwood's role appears to be land availability and cross border consideration appears weak: the Dunsfold Park Garden Village development (3 miles north of the Plan area), 1,800 dwellings initially, extending to 2,600, will have a significant impact upon the North-east parishes, alongside the proposed development in Billingshurst (Horsham DC). In the wider scheme the addition of WG's additional 35 houses (latest -v- last

allocation) to the developments in Billingshurst would be a rounding error in the latter -v- permanent detrimental change in the former.

Infrastructure

The inconsistency in consideration of infrastructure limitations in this draft LP renders it unsound; whilst the need to conserve rural character is acknowledged, there is inconsistency in treatment of infrastructure constraints. It is unjustified to assert the A27 as a measured and limiting factor for the south, yet in comparison no proportionate measure appears to be considered for the NE plan area. In effect, a proportionately large overall growth, in percentage terms, is being allocated to the NE area despite the infrastructure roads/water/sewerage/electricity/schools all at their breaking limits.

Further, it is evident from details in the Infrastructure Development Plan that infrastructure improvements are focused around Chichester. Apart from St Richards Hospital in Chichester, the majority of WG residents do not look to Chichester for services. Primarily as a result of the SDNP splitting Chichester District, the northern parishes are remote from Chichester.

The proposal related to WG is purely for housing development. 'The strategy is to locate development in areas which are well located to other uses'; Wisborough Green is not.

WGPC has concerns that the claims made will be neither addressed nor achieved in Wisborough Green:

- Public or sustainable transport
- Education places
- Healthcare provision
- Wastewater treatment capacity
- Water supply

Sustainable Transport

This allocation to Wisborough Green is also unsound, by way of inconsistency with policy T1 which requires that development should avoid the need to travel by car. The Sustainability Assessment section 5.2.32 confirms that the NE areas as a whole has limited potential of walk/cycle/public transport. In order to access Billingshurst, the next higher order settlement, car travel is the only practical solution; cycling this route is dangerous and there is no daily bus service.

The, extremely, limited bus services serving WG do not provide a practical alternative to use of private vehicles. It is an NPPF requirement (Chapter 5 Paragraph 73) for larger scale developments to provide genuine choice of transport modes – not available. The public transport infrastructure does not support the existing population let alone the scale of growth being considered – unsustainable. Details are provided in the WGNP Revised NP for Regulation 14 page 23.

<https://www.wisboroughgreen.org/wp-content/uploads/2021/04/Draft-Revised-Neighbourhood-Plan-for-Reg-14-consultation.pdf>

WG is currently served by two bus routes solely for shopping trips:

- No 64 to Horsham, via Billingshurst, leaving mid-morning on Monday and Thursday, allowing under 2 hours in Horsham.
- No 69 to Worthing on a Tuesday and Friday, allowing 2½ hours in Worthing.

There is no provision to link with employment or student requirements to the railway station in Billingshurst. Private car use is essential.

WG is almost wholly reliant on private cars and, it follows, that any development in the village cannot reduce its 'contribution' to climate change nor reduce reliance on private cars.

- WG possesses almost pitiful availability of public transport resulting, intrinsically, in car use - for residents and visitors alike.
- No local housing developments are accessible by any means of public transport on a regular basis, regardless of type, mix and use.
- Rail or bus transport, enabling access to employment and services, is 3 miles away in Billingshurst without a public transport link to Wisborough Green and bicycle access inherently dangerous along a busy A road.

In a 2020 survey undertaken to support the Neighbourhood Plan review:

- the majority of respondents 89% (185) do **not** use infrequent and inconvenient buses, driving is a necessity
- 87% (180) of respondents do **not** use the Wisborough Green minibus
- 93% (192) do **not** use the medical car service
- 87% use a car on a daily basis. Car ownership is higher than average with many households owning 3 or more domestic or work-related vehicles.

In the 2011 Census, every Wisborough Green household had, on average, access to 1.85 cars. This compares to 1.44 per household for the Chichester District and 1.34 cars per household across West Sussex. There is increasing reliance upon private vehicles for those in rural villages.

Due to property unaffordability, there is an increase in younger people remaining at home, which has increased the number of cars per household.

In the November 2011 Neighbourhood Plan survey:

- 29.49% households had one car
- 45.62% had 2 cars
- 18.89% had 3 cars or more.

In the 2020 survey:

- a total of 412 cars were owned by 202 households; an average of 2 cars for all households that responded.
- 28% had one car
- 50% had 2 cars
- 21% had 3 cars or more, demonstrating an increase in car ownership.

The 2011 Census indicates that out of the 601 households, only 43 had no car or van.

The road network local to Wisborough Green consists of unclassified roads and is not suitable for the numbers or size of traffic that the development in adjacent planning authorities will generate, not to mention development in the NE parishes themselves. Traffic on local roads is already growing and increasing hazard for cyclists and pedestrians.

Residents should not be expected to cycle 3 miles to Billingshurst (where the secondary school and railway station are located) along the A272, a busy main east/west road. The WSCC traffic monitor, in the centre of WG, recorded a 7-day daily average of 2304 vehicles eastbound and 2296 vehicles westbound for a week in January between 7 am and 7pm. Other development in the area will increase this volume.

Any development in WG will not reduce reliance on the private car rendering it unsustainable - residents are reliant upon the car.

Education Places

Primary School

Wisborough Green Primary School (4-11 years)

- Has a Pupil Admission Number of 210 (7 classes of 30), currently with 3 vacancies.
- Over 50% of these places are now taken by out of catchment children primarily from Billingshurst (most of whom arrive by car).
- It is already known that house sales in the village have fallen through as parents have been unable to secure places at the school and allowing their children to walk to school.
- Children are being driven into the village, and children are being driven out of the village due to lack of places.
- There is an expectation that the progression of development will allow WG children to naturally take up/displace out of catchment children. Without any development being phased through the plan period, it is anticipated that parents will still be unable to secure places until the 'sibling rule' runs its course.
- There appears an expectation that new houses in Wisborough Green will have only young children starting at the lower end of the school. This is rarely the case and there is a real concern that children from the same family will have to attend different schools.

Secondary Education

The Weald in Billingshurst, the secondary school into which WG Primary School feeds, has 1812 capacity with 26 places available (average 3.71 places/year group) currently. There is a lack of capacity for additional children from Wisborough Green, Loxwood and Kirdford, along with those from the Billingshurst development.

Healthcare Provision

WG does not have a doctor's surgery. A survey to support the WG Neighbourhood Plan process found that 45.6% of residents attend Loxwood Surgery, 41.5% - Billingshurst, 5.5% - Petworth, 6.5% - Other

Currently Loxwood Surgery has approximately 6,700 patients; the average for that size of practice is 8,300. CDC Infrastructure Development Plan correctly identifies Loxwood as having capacity, but also, correctly, notes this will be taken up by development in Loxwood and Dunsfold (the Cranleigh medical practice is at capacity with no expansion plans). Even with Loxwood's current extension plans they anticipate local area development will take up any spare capacity, leaving no capacity for WG residents.

Currently Billingshurst Surgery supports 13,700 patients with capacity up to 14,000: spare capacity which will be taken up by the occupants of the new housing due for development. The practice borders Broadbridge Heath (north) and Adversane (south); they maintain serious concerns about more housing allocation. An expansion of Billingshurst surgery is constrained by the premises also providing space for ancillary health services that used to be run from hospitals: physiotherapy, occupational and speech therapy etc.

Pulborough and Petworth Medical Practices are, technically, out of catchment for WG but they retain a few WG patients who risk their renewal being rejected. Although the practices have some capacity, they are not accepting new WG patients.

Village Facilities

Whilst the definition of the term 'larger villages' is not specified, any claim of WG offering 'a range of local facilities and play an important role in providing services to their local communities' is not the case; WG has three pubs (one closed) and a village shop, solely used for top-up purchases, incorporating a Post Office - soon to close.

Road Infrastructure and Resilience – lack of

WG, and the other northeast parishes, share common connection to Billingshurst for the nearest supermarket, railway station and other services across Newbridge, the narrow bridge on the A272, spanning the River Arun, a listed and protected ancient structure.

This is also the primary route to the nearest town, Horsham, and other key destinations; during heavy rain, the A272 becomes flooded at Newbridge and can be closed. Within the past 10 years river crossings in all compass directions from WG were flooded, making the village an isolated island until the water receded. The scale of growth being considered for the combined NE parishes would add considerably to vehicle movements in addition to those from the hundreds of new homes in Billingshurst. This would add to the congestion experienced at the, restricted capacity, Arun river crossing; the ancient bridge is a respected, loved and listed feature of the local countryside; substantial increases in traffic will place it at further risk.

Electricity

The nearest mains gas supply is in Billingshurst; in the absence of a mains connection:

- Some use electricity for heating and cooking
- Many use oil for heating and electricity/bottled LPG for cooking
- Some use LPG from refillable tanks for heating and cooking

The electricity supply to the village has created difficulties for many with fluctuations and short-term power cuts being experienced. As a rural parish, with many power lines passing through wooded areas (both within the parish and the far wider supply area), windy weather and consequent tree fall often cut the electricity supply for long periods, creating challenges for many in the parish, particularly during cold weather.

Any loss of electricity also contributes to the surface water and foul water flooding of properties when electric pumps are unable to operate. It is essential that any waste and foul water management systems serving new development does not exacerbate the difficulties already experienced and be reliant upon mains electricity to function.

In October 2022, the National Grid Electricity System Operator (ESO) opened The Future Energy Scenarios 2023 Call for Evidence consultation, providing their stakeholder communities with an opportunity to contribute to Future Energy Solutions (FES) 2023 and beyond. [The results were published in November 2022.](#)

In answer to the following question (p10):

19. "What are the top three elements where you believe your local region or area may see a different pathway compared to the main FES predictions? We're particularly interested in ideas we may not have considered." It states:

West Sussex:

- Higher levels of inequality leading to disparities in take up of low-carbon heating and technologies.
- Rural areas with larger numbers of off gas grid homes and communities.
- Large areas of national park and AONB, which will limit opportunities for renewable generation.

In support of climate change policies, there is a move towards the phasing out of gas in favour of, claimed, sustainable forms of heating, involving electricity. WGPC has serious concerns that the village supply is inadequate and is unable to support a further 75 houses, particularly for sustainable electric heating.

By way of evidence, on 4th October 2017 Jones Homes, the developer of the Great Meadow site of 25 homes in the village, confirmed that the development would be using air-source heat pumps; this decision was later reversed in favour of a communal LPG tank, it is understood this was because of perceived lack of supply capacity and individual home's running costs.

Wastewater

It is woeful that strategic policy 'Statements of Common Ground' were not agreed prior to the draft LP's preparation. There are statements within the evidence base pertaining to infrastructure and future delivery that do not reflect concerns at the current local situation, and the stresses that already apparent. WGPC's and the other NE parish's concerns are not being taken seriously by CDC.

During the NP consultations, WG residents were asked to provide comments regarding their experiences of the drainage system and evidence to support any perceived inadequacies of the system in Wisborough Green. It should be noted that WG has its own treatment works and does not come under Loxwood, as identified in the CDC Infrastructure Development Plan.

- The main foul water system and capacity for the settlement area fall to the sewage treatment works on the east of the village, south of the A272.
- WG is served by two pumping stations, to the west and north of the village.
- Being located in the Low Weald, the soil has a high clay content, resulting in large-scale soil expansion and contraction causing ground movement affecting buildings and foul water infrastructure, often resulting in cracked pipes, displacement of pipe joints and cracks in inspection chamber brickwork.
- Trees are also a contributing factor to subsidence and where tree roots penetrate or move the system, contribute to system leaks and backups.
- During heavy rain, residents along the A272 have noted backing up leading to concerns related to the adequacy of the system, or lack thereof.
- In Newpound Lane sewage back up and leakage from inspection chamber covers happens frequently; it is particularly apparent at Moonsbrook Cottage (Newpound Lane) where excessive road surface water has overwhelmed both the sewage system and adjacent brook, causing the road to flood on numerous occasions, resulting in discharge into the local brook, a tributary of the River Arun.
- Leakage from chambers is also evident on farmland.

Clearly severe problems are already being experienced and additional housing is likely to exacerbate these issues. WGPC is concerned that Southern Water is not taking these concerns seriously, and that they base their capacity figures on dry/damp weather conditions.

Climate Change

Development in the NE parishes, with inevitable promotion of car use, does not support this ambition.

Housing Need

WG's local (with village connection) housing needs are being met. In recently completed developments, some affordable rental and shared ownership properties were allocated to out-of-the-village residents due to lack of in-village demand. It is likely, in the absence of definite new evidence, that they will continue to be met with provision within a smaller housing allocation.

Open market housing will remain unaffordable for many due to the nature of Wisborough Green, a quintessential West Sussex village; further Shared Ownership, and other claimed 'affordable' schemes remain unaffordable as they invariably relate to market prices.

SUMMARY

In summary we consider that policy H3 is not justified and is therefore not sound. The allocation of 75 homes to Wisborough Green is inconsistent with the approach to housing distribution set out in other policies. CDC has made a strong case for the reasons why development in the southern part of the district is constrained, but it is in error in then considering that the northern part of the district can accommodate additional development above that suggested during the Regulation 18 consultation. A sustainability-based approach does not support the proposed allocation and it should revert to that proposed at Regulation 18 stage.