

Examination of the Chichester Local Plan 2021-2039
Response to Matter 3: The Spatial Strategy

Matter 3:
Policy S1 Spatial Development Strategy

Q.13 What is the justification for the proposed distribution of development in the plan area?

- CDC's Local Plan review correctly identifies the southern part of the district as preferential for development.
- The Plan area is bisected by a wide belt of the South Downs National Park with restricted housing development opportunity within the total Plan Area.
- However, apparent restraints on development in the southern area, in part through the failure to upgrade the A27, has created pressure for increased development elsewhere, in this instance in the northern Plan area.
- WGPC asks the question how the current inability to upgrade the A27 is a good reason to allocate unsustainable housing to northern parishes particularly given the Plan period of extending to 2039?
- Did CDC consider granting consent in the southern area subject to 'Grampian Conditions', whereby development would be delayed until such time as the A27 upgrade and other constraints had been relieved? In considering the previous 'no stone unturned' request, WGPC has been unable to find any evidence that CDC considered the use of Grampian Conditions that:
 - grant consents in the preferred southern area,
 - with robust infrastructure,
 - preserving the character of the northern rural villages, natural environments and landscapes (in line with NPPF 15, 180 and 186)
 - deliverable once the upgrade to the A27 has been delivered, a likely scenario given that the Local Plan period extends to 2039.

The CDC Draft LP states pp 34, 3.6:

'In accommodating such needs the strategy's emphasis is to locate development in areas which are well located to other uses, serviced by a choice of transport modes and accessible to the communities they serve.'

- Wisborough Green:
 - has extremely limited bus services (1 off peak bus, 4 days per week to Horsham and Worthing giving about 2 hours at the destination) WSCC has recently introduced the Book a Bus to provide further opportunities for daytime travel but is again limited in times and destinations and will not serve the majority of Wisborough Green's population - a sticking plaster for a major wound.

- has no cycle routes
- has one village shop providing limited, expensive, supplies.
- Therefore unsustainable car use is essential.

The CDC Draft LP states pp 37, 3.23:

CDC acknowledges that accessibility to services and facilities is a particular issue, with residents having to travel significant distances for facilities.

- WGPC maintains that this is unsustainable development when car ownership and use is essential, contrary to the NPPF 108-110.

Point 3.22 states:

‘Conserving the rural character of the area, with its high-quality landscape and environment, is a key objective. There is, however, an identified need to accommodate some development to address local housing and employment needs and support local village facilities.’

- WGPC contend that using the Northern Parishes to alleviate housing issues in the Chichester vicinity lacks logic as:
 - Wisborough Green, and the Northern Parishes, reside on the borders of Horsham and Waverley Borough (Surrey) Districts.
 - Distances from Wisborough Green are:
 - Chichester - 21.6 miles
 - Horsham - 10.5 miles
 - Guildford (the far side of Waverley Borough) - 17 miles
 - The difficulty of accessing services in Chichester is indicative of the remoteness and therefore unsustainability of development in the Northern Parishes.
 - It is inherently unsustainable and contrary to CDC’s key objective. This is confirmed in [an attachment](#) to an email dated 09.02.22 George Whalley to Tony Whitty:

‘The Council needs to identify and consider options with regards to the northern part of the Plan area. This is in the context of the current understanding of the deliverable capacity in the southern part of the plan area – which will mean that the Council is unable to meet its housing needs...’
- In ‘Local Plan - economy, transport etc. the reasoning and supporting evidence is almost wholly Chichester-centric [*It is accepted that development in the north is less sustainable*]
- Local Plan Page 199 - 8.6: ‘development will be directed to the most sustainable locations where the need to travel is reduced or there are suitable alternatives to the car. Development will also be phased to align with future transport improvements planned to support development over the plan period. (Use of Grampian conditions?)
- 8.8: ‘Increasing the capacity of the road network is key to supporting growth in the Local Plan. However, there is also a need to reduce demand for road transport to achieve net zero in greenhouse gas emissions by 2050 as highlighted in the council’s Climate Emergency Action Plan and Strategic Objective 1. In aiming to achieve the ambitions of the action plan, all

development is expected to demonstrate how it will support four key objectives to create an integrated transport network which will alleviate pressure on the road network, improve highway safety, encourage sustainable travel behaviours and help reduce transport related impact on air quality, by:

- 1. Avoiding or reducing the need to travel by car;
- 2. Enabling access to sustainable means of travel, including public transport, walking and cycling;
- 3. Managing travel demand; and
- 4. Mitigating the impacts of travel by car.'

Not only are these policies Chichester/southern area-centric but insufficient weight has been applied in how they impact upon development in the north east area: development is wholly reliant upon car use.

- Policy T1 (Page 203) and T2 (Page 206) and Policy T3 (Page 209) are Chichester centric and not relevant to northern parishes
- The northern part of the plan area, and Wisborough Green especially, already harbour significant development constraints:
 - Water Neutrality is preventing even medium scale development and it is a reasonable assumption that the A27 issues will be resolved before those of water supply.
 - Schools
 - There is a lack of school places. WG School is full and is forced to take children from Billingshurst, within Horsham District. There is little opportunity for the children of any new families moving to Wisborough Green finding a space in the school, especially if they are not enrolled into the first (reception) year. Families are therefore driving from Billingshurst to Wisborough Green school, and Wisborough Green families are driving out of the village.
 - GP medical cover
 - There is no medical provision within Wisborough Green.
 - Billingshurst GP services are already over-subscribed, indeed Billingshurst already requires additional provision to service the scale of development there.
 - Loxwood Surgery did have capacity, but CDC acknowledged that this will be rapidly used up by the strategic developments in both Loxwood, Alfold and Dunsfold.
 - The Mens SSSI, parts of which are within the parish. Refer to objections made relating to a development for [25 dwellings on the Glebe Fields, subsequently withdrawn](#)
[Wisborough Green Parish Council](#)
[The Parishes Wildlife Group](#)
[The Parishes Wildlife Group - independent review of NP HRA](#)
[The Sussex Wildlife Trust](#)
 - The paucity of public transport.
 - European Protected Bat flight paths and feeding areas.
[Wisborough Green Parish Council](#)

Q.14 In assessing the transport impacts of housing growth, what reasonable alternative levels of housing growth were considered for the southern plan area and why were they discounted? (see also Matter 4A transport)

- Key questions with inadequate answers
- Northeast area being used as ‘dumping ground’ and apparently not subject to the same criteria for development that exist in the southern plan area, e.g. sustainable transport.
- Chapter 10 - Strategic and Area Based Policies
‘10.2 Chichester city is the main employment and commercial centre of the plan area.’
- Sustainability Appraisal
‘2.2.3 The cathedral city of Chichester (population estimate 29,193 in 2021) is the main centre for higher order services, facilities and retail, as well as employment.’
- Responses from neighbouring districts:
 - ‘5.2.31 Finally, with regards to the northeast plan area, the A27 is not an issue but there are significant wider transport and accessibility considerations. Transport-related barriers to growth were considered through an appraisal of reasonable alternative growth scenarios in late 2019, as discussed above, and there was also a dedicated targeted consultation on growth scenarios for the northeast plan area in January 2022, which led to transport concerns being raised by neighbouring Waverley Borough and Horsham District.’
 - ‘6.3.2 Finally, there is a need to note that both Waverley Council and Surrey County Council responded to an informal consultation in early 2022 stating concern regarding higher growth in the northeast plan area on transport grounds, highlighting the poor public transport connectivity and general rurality of the area.’
- Development should be located where supportive infrastructure exists.

Q.15 The final paragraph of the Policy says ‘To ensure that the council delivers its housing target, the distribution of development may need to be flexibly applied, within the overall context of seeking to ensure that the majority of new housing is developed in accordance with this Strategy where appropriate and consistent with other policies in this plan. Any changes to the distribution will be clearly evidenced and monitored through the Authority ‘Monitoring Report’.

What is meant by ‘flexibly applied’? Is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

- ‘Flexibly applied’ is seeking to do some heavy-lifting here.

- The application of the flexibility ignores significant contraventions of overarching policy.
- Especially
 - the disregard for sustainable development in the northeast area.
 - the 'clearly evidenced' changes to the distribution which, as will be shown in other representations to the Inspector, include a slapdash use of HELAA figures with regard to the northeast area.

Q.16 Are the proposed main modifications (MMs) necessary for soundness?

- WGPC has no comment in this regard.