



Examination of the Chichester Local Plan 2021-2039
Response to Matter 4C: Housing

Matter 4C (not relating to Gypsy, Traveller etc)

Q.64 Policy H1 Meeting Housing Needs sets a housing requirement for the full plan period 2021 – 2039 of at least 10,350 dwellings. This is below the local housing need for the area as determined by the standard method. The justification for the proposed provision of 535 dpa in the southern area has been considered under Matter 4A Transport.

Is the proposed figure of 40 dpa in the northern part of the plan area justified?

- The answer is 'no'. It is apparent that large developments in neighbouring parishes/districts have not been taken into account (Billingshurst, Loxwood, Alfold, Dunsfold).

Q.65 Would the adverse impacts of the Plan not providing for objectively assessed housing needs significantly and demonstrably outweigh the benefits of doing so when assessed against the policies in the NPPF taken as a whole? That is to say is the overall housing requirement justified?

- No comments.

Q.66 Paragraph 5.2 of the Plan sets out that the housing requirement would be made up of 535 dpa in the southern area and 40 dpa in the northern area. These figures are not included in Policy H1. Is this effective?

- WGPC doubts this is effective; whilst non-strategic allocation is lower down the food chain its effect on local populations, infrastructure and services is real and scale increasingly relevant: 10 houses are a rounding error in a large strategic site but a major change in a small rural community.

Housing land supply

Policy H1 Meeting Housing Needs sets out the broad sources of supply to meet the housing requirement. Housing land supply will be provided by the Plan, the existing site allocation DPD, a new DPD and Neighbourhood Plans. The Plan therefore is not singly providing for all the supply in the plan period, though it is setting the overall housing requirement.

Q.68 Are the components of the overall housing land supply set out in Policy H1 (as updated in BP07 Housing supply background paper) justified?

- With regard to housing supply in WG no justification has been offered to the number proposed.

Specially: Is footnote 29 as set out in the submitted Plan regarding Site Allocation DPD allocations correct given that policies of that plan are not to be superseded by this Plan? What is the compelling evidence that windfall sites will make the anticipated contribution to housing land supply over the plan period?

Policy H3 Non-Strategic Parish Housing Requirements 2021 – 2039

- WGPC acknowledges that having a Local Plan (LP) is desirable and essential to avoid speculative development and to meet government mandated targets.
- WGPC submitted comments for the Reg 19 consultation, raising concerns about the infrastructure and the housing allocation. During discussions with CDC, WGPC did not receive satisfactory answers to questions over the housing allocation and how it was determined.
- Consequently WGPC submitted a series of Freedom of Information (Fol) requests, not receiving final replies until after the draft LP was submitted for examination. The information received raised serious concerns.
- WGPC accepts further development is needed, to meet village need (although none is identified in CDC's draft LP) and to fulfil district-wide commitments. WGPC embraced the NP process and almost completed the review. In doing so, WGPC gained a wealth of knowledge and strongly feels the calculations for the development level proposed in the LP is flawed, for many reasons, and would destroy the character of the village and undermine community spirit.
- WGPC considers that in preparing the draft LP, CDC eschewed drawing upon the detailed local knowledge WGPC and its Neighbourhood Plan (NP) Group have accumulated. In likelihood this insouciance stems from WG being well down the pecking order as it's a) not in the vicinity of Chichester and b) non-strategic. When preparing the draft LP, WG is deemed unimportant; demonstrated by:
 - The draft Plan iterations yielded the following housing numbers for WG:
 - At commencement: 25 houses
 - In 2020: 40 houses
 - In 2023, literally just before the draft Plan was published: 75 houses
 - The last figure smacks of a last-minute dump to make the district's numbers add up, ignoring the impact this figure would have.
 - WG is a quintessential English village, centred on its historic and beautiful village green and prominent, listed 12th century church
 - The 75-housing number when added to the 68 delivered in the last NP would see an unsustainable increase of 22.48% in the number of homes in the village
 - WGPC believes, and the evidence derived from Fol requests supports, that CDC have relied upon flawed HELAA figures to arrive at the 75 number.
- **WG's Extant NP:** Was 'made' by the South Downs National Park Authority on 9th June 2016 and CDC on 19th July 2016. Extensive research and consultation was undertaken to meet the housing allocation for the period 2014 - 2029 (minimum of 60, 68 provided) ([detailed here](#)). Assessing potential sites, engaging and consulting the village, provided WGPC with a deep insight into the history and heritage of this rural village, the important aspects that contribute

to this thriving community as well as the challenges it faces.

CDC quoted one consultation event as exemplar to others engaging in the process.

- **NP Review:** Following CDC's request, in Autumn 2018 WGPC initiated a Review, CDC advised that Regulation 14 had to be started by January 2020. The NP Group, the core of which, in place since 2011, embraced the Review and, with external professional body's assistance, took it through Regulation 14. They undertook site assessments, reports and comprehensive engagement in support of the extant NP and in preparing the [NP Review](#); long-term residents of the village with commensurate detailed local knowledge.
- In June 2021, after Regulation 14, WGPC paused the process as CDC refused to confirm the 40 figure and rebuffed WGPC's attempts to engage CDC in discussion to obtain a better understanding of CDC's thinking. No engagement occurred.
- **Local Plan Regulation 19 Consultation:**

This was an abominable public consultation, almost designed to be hard to respond to; WGPC is concerned that its egregious nature rendered it discriminatory and undemocratic. There is speculation within WG that CDC's intention was making the process so difficult that people would not bother, and CDC could 'deduce' that residents were happy.
- The consultation was difficult for a parish council to complete with significant hours spent navigating it and the supporting data requirements: 'have you raised this point before, if so when; if not, why not?'
- For those not conversant with the intricacies of planning policy but who care deeply about the district it was fraught with problems with anecdotal evidence of many people just giving up.
- CDC's promotion of a complex online system placed the less technically-minded at a significant disadvantage. It silenced many WG voices especially, given the age profile of WG, the elderly; only those with confident IT skills, tenacity and time could respond. There appeared no option for those without online access to view the document in this area.

These deficiencies are reflected in the response rate: the Reports Pack for the Council Meeting on 18th July states:

 - There were 178 respondents via the web-based system.
 - 111 by email, 32 by letter.
 - A total of 321 respondents out of 105,485 aged 15+ in the Chichester District (2021 Census) or 54,100 households (2021 Census): a pitiful 0.6% household response rate, at best, especially as many responses were developers promoting their sites.
 - The CDC Press Release of 18th July 2023 refers to 2,500 comments, giving the impression of a positive outcome, the opposite was the case; WGPC alone made nearly 100 of these comments.
- **Village Survey: In August 2024** WGPC organised an [online survey](#) to gauge feeling to CDC's proposed housing number asking two questions:
 - With regard to the proposed 75 new homes (on top of the 68 already delivered) do you:
 - Oppose this number? 503 (97.48%)

- Approve of this number? 13 (2.52%)

WG population: 1414 (2011 Census), 516 (35.5%) responded to this question

Do you request the Planning Inspector to ask CDC to look again at the soundness of the WG allocation?

- I do 509 (97.88%)
- I do not 11 (2.12%)

520 (36.7%) responded to this question

- The results should be viewed in the context of the Regulation 14 consultation: an additional 40 houses were accepted by WG without protest, and demonstrate the vehemence against the, last minute, allocation of 75 houses.

Q.73 What is the justification for the parish housing requirements set out in Policy H3?

- **Housing Allocation – increase from 25 to 40, then to proposed 75**
 - In 2018, WG was allocated 25 homes (on top of 68 delivered in the first NP)
 - In 2020 this was increased to 40, then
 - In January 2023 to 75. Critically, this figure was communicated on 4th January 2023, 30 days before CDC’s LP entering the Regulation 19 consultation - 3rd February 2023.
 - The timing of the announcement and when the figure was decided is crucial: if the decision for the increase of 87.5% over the 2020 figure was known in advance why was it not communicated to WGPC; if it was a last-minute decision it’s indicative of an ill-thought-through decision?
 - FoI requests revealed that a briefing was presented by AECOM to members on the 18th July 2022 which included the 75 housing scenario for WG. On 20th October CDC Officers gave a briefing to Members to ascertain views on numbers to include in the Submission. WGPC is alarmed that no minutes or notes were taken at either of these meetings, despite transparency apparently being pivotal to CDC’s mission.
- **Lack of Transparency - FoI Requests**
 - WGPC is concerned by CDC’s lack of transparency and unwillingness to engage, particularly the NP Review Group which had already demonstrated significant competence.
 - Frustration grew in WG at CDC’s lack of engagement and refusal to explain how the 75 houses figure was determined.
 - Consequently, WGPC submitted FoI requests.
 - The first on 13 July 2023, response received 7 August 2023 lacking some of the information requested.
 - The second on 17 August 2023 and, after chasing 5 times, response received 8 December 2023.
 - Further request on 2 February, acknowledging the officer concerned was progressing the LP submission, response received on 15 May 2024.
- As a result of scrutinising the documents/emails sent WGPC believe that the calculation for the housing allocation for Wisborough Green is **unsound**.

- **Policy H3 Non-Strategic Parish Housing Requirements 2021 – 2039**
 - **Housing and Economic Land Availability Assessment (HELAA) Inconsistencies**
 - WGPC contends that CDC’s HELAA figures lack soundness and leading to an incorrect and unsustainable allocation to WG.
 - Seeking to ‘leave no stone unturned’ and achieve numbers required in the overall district, CDC rely on the existing and updated HELAA, evidenced in the reports prepared by AECOM on the site allocation for WG and included in the Sustainability Appraisal (SA). A document which considers [Options for the North of Plan Area V3 \(dated December 2021\)](#) states the HELAA is the starting document. WGPC has identified inconsistencies in the HELAA and is concerned that this flawed HELAA drove WG’s housing allocation.
 - This is demonstrated in the [CDC’s SA](#), page 113, which states for HWG0004 ‘the assumption within both the draft neighbourhood plan and the HELAA is delivery of 10 homes plus ~0.9 ha of open space. There is feasibly the potential to deliver housing across the entire site, which could lead to a capacity of up to 40 homes (and there is also land directly to the northeast of the site that might additionally come into consideration, were it to be made available). An Inspector gave clear reasons for [dismissing an appeal](#) for a larger scheme in 2018 (16/02717/OUT). Notwithstanding the bizarre claim about land potentially becoming available CDC acknowledged the failed appeal in the SA but continued to use the incorrect assumption in their scenarios.
 - In the SA, page 113, CDC discuss HWG0011: ‘Finally, there is a need to consider HWG0011 (N.B. HWG0020 is proposed only for employment, and so need not be considered further here). This site is not supported by the Parish Council, and is clearly sensitive in historic environment terms, as it intersects the conservation area and the grade 1 listed parish church, which is prominent on raised ground, is near adjacent. There are also historic field boundaries and PRoW running through and adjacent to the site. However, sensitive views into and across the site are limited, specifically primarily limited to the PRoW (also potentially Newpound Lane, subject to hedgerow height), and a sensitively masterplanned scheme could relate quite well to the existing built form of the village. The HELAA identifies a capacity of 80 homes, which amounts to a gross density of 14.5 homes per hectare, which is assumed to be a suitably low density. However, it is recognised that detailed work could serve to highlight the need for fewer homes given the sensitivities.’
 - [Email to Andrew Rushmer and Claire Potts \(CDC Planning Policy Officers\)](#) on 21 June 2022 from Matthew Evans states: ‘Land at ST. Peters church. I think the church is Grade I – feels like the heritage constraints need more emphasis and needs more assessment. Might even rule out development.’
 - The SA states: ‘With regards to reasonable growth scenarios, as an initial step it is fair to rule-out the low growth scenarios, specifically a scenario involving committed sites only and scenarios involving fewer than 45 homes across sites HWG0004, HWG0019, HWG0022 and Tanglewood Nursery (i.e. the sites supported by the draft neighbourhood plan in 2021).’

Without any explanation as to why ‘it is fair’ to rule low-growth out.

‘There is a clear argument for significant growth at Wisborough Green, given the strategic context. It is recognised that two of the sites are separated from the village core / settlement boundary; however, the strategic context serves to suggest a need to take these sites forward nonetheless.’

Yet nowhere in the whole of the Plan evidence is any attempt made to set out this ‘clear argument’

- Despite higher numbers on HWG004 having been dismissed at Appeal and CDC’s own assessment identifying constraints for HWG0011 possibly ruling out any development, the scenario CDC selected was ‘Scenario 2 – 75 homes’, assumed to involve the draft neighbourhood plan sites plus either additional homes at either HWG0004 or additional allocation of HWG0011 for a low density scheme.’
- WGPC is inexorably drawn to the conclusion that the allocation of housing numbers to WG was an ill-thought-through after-thought and appears solely to have relied upon flawed HELAA data.
- Further evidenced in the SA page 113:
‘Looking beyond HELAA sites, it is difficult to envisage the potential for further strategic growth. Attention focuses on the arc of land to the north and east of the village, as land to the west is constrained on account of a prominent hill and the national park, whilst land to the south is constrained by a river corridor. However, within this sector, land to the north is poorly connected, and in all directions, there would be a risk of poor containment within the landscape / future sprawl and impacts to the valued historic character of the village. With regards to reasonable growth scenarios, as an initial step it is fair to rule-out the low growth scenarios, specifically a scenario involving committed sites only and scenarios involving fewer than 45 homes across sites HWG0004, HWG0019, HWG0022 and Tanglewood Nursery (i.e. the sites supported by the draft neighbourhood plan in 2021). There is a clear argument for significant growth at Wisborough Green, given the strategic context. It is recognised that two of the sites are separated from the village core / settlement boundary; however, the strategic context serves to suggest a need to take these sites forward nonetheless.’
- The [HELAA](#) has marked HWG0018 as red despite the constraints on the site (access) having been effectively remedied and the site’s current potential for a small development having been discussed with CDC’s Conservation and Heritage Officers on site.
- The SA, page 113, concludes:
‘Under all of these scenarios it is fair to assume that the task of allocation would be delegated to the Parish Council, given a range of detailed site specific considerations that will have a bearing on appropriate site capacities/densities, and given that **the Parish Council has a strong track record in respect of neighbourhood planning.**’ and yet CDC has steadfastly refused to engage with WGPC.

- **Further evidence for CDC's muddled thinking regarding WG housing numbers:**

- This contention is reinforced in an attachment to an email of 13th January 2022 entitled '[Northern Option Scenarios – January 2022](#)' where site HWG0004 – Stable Field is marked as 'deliverable' in both the 'low' (40) and 'medium' (80) scenarios despite contrary evidence.
- HWG0004: In the [scenario documents](#) dated January 2022 this site is identified for 40-80; as already confirmed this site had an application for 30 units and community facilities refused on [appeal](#), detailing 6 separate reasons for refusal. The AECOM assessment also includes reference that land to the north of this site could increase capacity - locally this is known to be unavailable.
CDC was also aware that a planning application was being progressed which and included in the NP Review. The [planning application for 8](#) houses was validated April 2022 and permitted April 2024.
- [Email: 8 February 2022](#) from Matthew Ellis, Waverley BC to Tony Whitty asks: 'If so, how did you arrive at the **three options** for the north of the plan area and what is the justification for the different levels of growth. I quickly **looked at the HELAA and the SA but could not see any supporting evidence** except that Option 3 appears to be based on the maximum capacity of each settlement to deliver housing if all the potential housing on individual sites identified in the HELAA are developed.'
- The lack of 'supporting evidence' leads to the fair assumption that the main driver of the housing allocation to WG is the median between the maximum possible, identified by HELAA, and no development at all. 23 March 2022 email sent to 9 CDC Officers with a document entitled '[Northern Site Options 22.03.21](#)' reference is made to four potential sites in WG identified on the [HELAA](#). This document was shared with AECOM at a meeting the previous day:
 - i. HWG0004 – Stable Field – maximum housing yield is 40-80
 - ii. HWG0011 – Glebe Fields – maximum housing yield is 80, and
 - iii. HWG0019 – Ansell's Yard – maximum yield is 18
 - iv. HWG0022 – Winterfold Gardens – maximum yield 10Equalling a combined total of 148-188 houses.
It's a fair assumption that this maximum figure did drive thinking on a median figure for WG despite the figures being demonstrably undeliverable.

- **Inconsistent Access Assessment**

- [HWG0018](#), site south of the A272, has been identified as 'no potential' - Significant access constraints, Setting of Conservation Area, listed buildings. Southern part of the site in Flood Zone 3b. Additional land in Flood Zones 2 and 3a.
- However, HWG0011, is identified as developable and promoted for up to 80 dwellings. HWG0011 also carries significant access constraints: vehicles associated with 80 houses accessing a double-solid-white line section of the A272, through Glebe Way, would be unsafe and access onto Newpound Lane is severely restricted and unsuitable on a narrow lane.
In the SA:
'East of Wisborough Green – the potential for two points of access can be envisaged; however: access onto Newpound Lane would be constrained on account of the narrow rural character of the lane and the need to avoid conflicts with

primary school traffic; whilst access onto Glebe Way would be constrained as this is a narrow cul-de-sac, seemingly designed to support traffic from just a small number of homes.'

- **HWG0011** in [CDC's HELAA](#) the availability and potential number is stated by the land promoter.
Surprisingly: **'There are no known constraints that would make development unachievable in principle'**. The promoter estimates that the site could be delivered within 5 years and could be phased.
- When raising concern about this site with CDC, on 21 June 2023, WGPC was advised that: 'The HELAA identifies sites that may have potential for development but is a policy off approach. There are then policy considerations and issues that will need to be taken into account prior to the determination of any subsequent planning application.'
- Whilst a 'policy off approach' targets neutrality it is not viewed as such, will steer future assessment and **bypass local considerations which are addressed later within the NP** and planning application process.
- A planning application for this site for 25 dwellings was submitted in 2021 [WR/21/00621/FUL](#) and subsequently withdrawn. [Historic England](#) raised serious concerns about the impact upon the church. The land promoter has sought pre-application advice from CDC for a larger scheme across the 3 fields, up to 65 dwellings, and WGPC understands that the Conservation and Landscape Officers have raised serious concerns about impact on the historic building and landscape. In March 2023 WGPC commissioned a [Landscape and Historic Character Assessment](#) as part of the NP Review which confirms the sensitivity of the area; it is also confirmed in [CDC's Landscape Capacity Study \(Sub Area 167\)](#).
- The site is included in the [HELAA](#) without acknowledging the clear constraints identified by CDC Heritage and Landscape officers and Historic England. This is deceptive and inconsistent as similar constraints have been identified for a site [discounted](#) on the HELAA assessment.
- WGPC contends that CDC's over-reliance on the use of 'policy off' HELAA led to flawed assumptions/decisions which, in turn, led to a last-minute, unsustainable allocation of 75 homes to WG. CDC's method ignores other sites identified within WG's NP process which sit comfortably within the Round 2 criteria and reflect CDC's failure to draw on local intelligence within WG's NP Group.
- **Non-Strategic Housing Requirements**
 - CDC's draft LP 5.7 page 103 states:
'Following a similar approach to the 2015 LP, it is proposed that responsibility for identifying sites suitable for small-scale housing is assumed at a parish level in order to address the needs of local communities.
In accordance with the LP settlement hierarchy, it is intended that such new housing should generally be directed primarily towards the larger, more sustainable settlements'
 - WGPC takes issue with this statement for a number of reasons:
 - 'Small-scale housing' in the context of a city is not the same as small-scale housing in a rural village. e.g. the numbers being promoted for HWG0011, 65

- houses, would add circa 9.25% to the cumulative number of existing homes and housing plots identified in the previous iteration of the NP.
- Although the suggestion is that sites would be identified at parish level the inaccuracies of the HELAA and CDC's predominant reliance on high-number sites coupled with the refusal to engage reveal this as a hollow claim.
 - Development 'should generally be directed primarily towards the larger, more sustainable settlements'; WG is not a 'larger' settlement and, as demonstrated, any development in WG is unsustainable.
 - In early 2022 both Waverley BC and Surrey CC responded to a consultation voicing concern regarding higher growth in the northeast plan area on transport grounds, highlighting poor public transport connectivity and general rurality of the area. CDC did not release this response following a FoI request.
- Draft LP 5.8 page 103 states:
 'Small-scale housing sites will be identified to help provide for the needs of local communities in accordance with the parish housing requirements set out below. Suitable sites will be identified either through neighbourhood plans or subsequent development plan document.'
- CDC's use of the flawed HELAA data undermines the claim that 'sites will be identified [either] through neighbourhood plans...'
 - There is no supporting evidence offered that the WG housing allocation is related to 'parish housing requirements' and, evidenced in the draft LP, the housing allocated to the north east area is driven by the inability to deliver the housing where it's needed: the south of the district.
 - A June 2019 [Housing Needs Survey](#) in WG revealed the latent demand was for smaller, affordable units.
 - The type of development approved by CDC fails to meet actual demand:
 - 'Affordable' housing is not affordable; shared ownership pricing is based upon a percentage of market sale or rent, in areas like WG this renders the properties unaffordable to locals
 - 'Affordable' rental, in a recently completed development in WG, was occupied by those from further afield; local registered demand did not transpire, presumably as there was no need.
- At 5.9 page 113 the Plan states:
 'It is intended that the identification of sites and phasing of delivery will be determined by local communities through neighbourhood planning in consultation with the council.'
- Once again, CDC's reliance on the flawed HELAA data undermines this.

Q.75 What account was made of designated landscapes in determining the parish housing requirements?

- CDC commissioned its own report: '[Landscape Capacity Study 2019](#)' which identified Wisborough Green being in Sub Area 166 & Sub Area 167. Both areas were assessed as having High Landscape Sensitivity and Low Landscape capacity. This information wasn't transferred or referred to in HELAA assessments.