

# Chichester Local Plan Review Examination

Statement in response to Inspectors' questions on  
behalf of Merrow Wood – Matter 4C

September 2024

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## Appendices:

Appendix A: Prospect Farm site layout (indicative)

Report Presented by	Intelligent Land
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# 1. Summary context

- 1.1 Intelligent Land has been instructed by Merrow Wood, who have been selected by the landowner to help promote the site at Prospect Farm, Bosham for development, to submit representations on the Chichester Local Plan Review, Submission consultation.
- 1.2 Merrow Wood made comments on the submission draft plan in March 2023. These brief representations commented on the following:
  - The overall strategy for the Local Plan Review
  - Housing requirements and delivery
  - The role of Chidham and Hambrook in supporting the local plan development strategy.
  - A brief description of the site at Prospect Farm and surrounding area;
  - A review on constraints affecting the site;
  - A description of the site's potential to deliver development, having regard to the policy framework and constraints.
- 1.3 These representations also provided a general overview of the Prospect Farm site's potential and were accompanied by an indicative site layout having regard to any constraints and opportunities which relate to the site.
- 1.4 Further representations were submitted to the Council in July 2023 providing further detail on technical and landscape studies on the site at Prospect Farm.
- 1.5 In addition to engagement with the local plan process, Merrow Wood has also undertaken engagement with Chidham and Hambrook Parish Council, including meetings and presentations, and a formal pre-application consultation with the District Council, which has informed further technical work on the proposals at Prospect Farm.



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## 2. The purpose of this statement

2.1 Merrow Wood wishes to participate fully in the Chichester Local Plan Examination. Regrettably however, the Council appears to have categorised Merrow Wood's representations as "support" for the Local Plan. This has subsequently led to Merrow Wood being unable to attend and participate in the housing and area-based policy sessions at the Examination.

2.2 Merrow Wood wish to restate their objection to this position. In an e-mail to the Programme Officer on 20<sup>th</sup> August 2024, this objection was set out:

*I'm afraid we do disagree with a simplistic categorisation of our representations as complete support for the local plan.*

*Whilst we have expressed general support for the development strategy focussed on the south of the District, and for the allocation of 300 dwellings to Chidham and Hambrook - it is very clear from our representations that we do not think the plan goes far enough toward meeting housing needs and that further sites - specifically my client's site at Prospect Farm, should be allocated.*

*I note that our position reflects some of the Inspector's own questions to the Examination regarding housing figures generally and whether limits on development in the south of the District are properly evidenced.*

*I enclose our representations, and in particular would point the Inspector to the following paragraphs:*

*2.3-2.5 - raising concerns about the housing strategy in the south of the District*

*2.6-2.7 - suggesting the role of Prospect Farm in delivering the 300 allocation for Chidham and Hambrook (Policy A12)*

*It is then clear that the representations seek to promote the Prospect Farm site to the Examination, and the conclusions section 5 suggest the relationship of this additional site to the planning strategy.*

*Further technical details on the site were submitted to the Examination in August 2023 (again attached).*

*In summary therefore, Merrow Wood's position is that, whilst the planning strategy is to be supported in general terms, it does not go far enough to meeting housing needs, and, in the case of Policy A12 - could and should allocate sustainable sites, including Prospect Farm.*

*On that basis, I consider that Merrow Wood can make a positive contribution to the Examination with meaningful points to make, informing the discussion at the hearings. Our intention will be to respond to the Inspector's questions in the light of our previous representations.*

*I would therefore request that Merrow Wood are able to attend the Examination.*

2.3 Regrettably, this objection and justification has not resulted in any ability for Merrow Wood to take part in the hearings. Nonetheless, to facilitate the Examination and to inform the Inspectors, Merrow Wood wishes to respond to a number of questions posed by the Inspectors, and these are set out briefly in this statement.



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- 2.4 Merrow Wood wishes to reiterate however, that the Council’s decision to categorise their representations as “support” is erroneous and has created unfairness in the Examination process, to their disadvantage. We would again respectfully request the Inspectors to reconsider the decision to refuse attendance at the hearings having read this statement.



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### 3. Response to Inspectors' questions

- 3.1 Merrow Wood has reviewed the series of Issues and Questions published by the Local Plan Examination Inspectors in August 2024. We set out brief responses to 5 groups of questions below.
- 3.2 Whilst it is acknowledged that the Inspectors do not wish to discuss “omission sites”, such as Prospect Farm, this statement refers to the site only in context of housing strategy and delivery in accord with the issues raised. Details of the site are set out in Appendix A for context.

#### **Matter 4C: Housing**

**Issue: Is the proposed approach to housing development positively prepared, justified, effective, and consistent with national policy?**

#### **Local Housing Need**

Q.60 Is there any substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates in this case as per advice set out in the PPG (Paragraph: 010 Reference ID: 2a-010-20201216)?

- 3.3 As set out above, the current standard method produces a housing requirement for Chichester of 763 dwellings per annum, significantly above the 575 dwellings per annum figure in the submitted Local Plan. Whilst this is a concern in itself, it must now be seriously called into question given the likely implications of the new Government’s proposed revisions to calculation of the standard method, published for consultation in July 2024.
- 3.4 The revised calculation method produces an estimated housing requirement for Chichester of 1,206 dwellings per annum, some 58% higher than the current standard method figure, and more than double the submitted local plan figure.
- 3.5 Whilst it may fairly be said that the July 2024 revisions are draft and subject to consultation, it is very clear from the Ministerial Statement which accompanied the consultation that the new Government sees housing as a key priority and that the current local plan process has failed to deliver sufficient homes. As such it is reasonable to expect the proposals to be adopted by Government and housing requirements arising to be mandatory.
- 3.6 It is also inevitable that Chichester will be called into an immediate review of its local plan under the proposed transitional arrangements published in July, and that this plan will need to be in place by 2026.
- 3.7 Taken together these implications mean it is all the more essential that opportunities to increase housing delivery are not overlooked or ignored in this local plan, as the result will be even more onerous decisions being cascaded down the line to the immediate review of the Local Plan, as will inevitably be required in Chichester under the proposed NPPF transitional arrangements.



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- 3.8 Whilst sites such as Prospect Farm may be treated as “omission sites” not receiving debate at the Examination hearings, in our client’s view, this is shortsighted and should properly form part of the Inspectors’ assessment of whether the local plan housing requirement and strategy is reasonable and sound.

**Policy H3 Non-Strategic Parish Housing Requirements 2021 – 2039**

- Q.73 What is the justification for the parish housing requirements set out in Policy H3?
- Q.74 Is the statement in the last paragraph of the policy concerning what the Council would do in the event of demonstrable progress not being made in providing for the minimum housing numbers effective?

- 3.9 As noted above, the flaws in the housing strategy in terms of delivery is made worse by the level of housing cascaded to future neighbourhood plans.

- 3.10 Policy H2 identifies a number of areas where neighbourhood plans are “anticipated to be prepared” and where significant housing is allocated:

The following strategic locations have been identified where neighbourhood plans are anticipated to be prepared to identify the sites required:

Reference	Location	Dwellings
A2	Chichester city	270
A12	Nutbourne and Hambrook (Chidham and Hambrook Parish)	300
A15	Loxwood	220

If draft neighbourhood plans making provision for at least the minimum housing numbers of the relevant area have not made demonstrable progress, the council will allocate sites within a development plan document in order to meet the requirements of this Local Plan.

- 3.11 Whilst the plan hints at a form of intervention if such plans are not forthcoming, this appears to only be through a further development plan process, itself likely to take several years. Thus there is effectively no certainty at all that the almost 800 dwellings in the three areas above will come forward.



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## 4. Conclusions

- 4.1 Merrow Wood remain disappointed that they have been denied proper participation in the Chichester Local Plan Examination, when it has always been very clear that any indication of support for the spatial strategy has been high level whilst maintaining concerns at lower housing numbers and the mechanisms for housing delivery, as well as clearly promoting a further site at Prospect Farm.
- 4.2 On that basis there is no sound reason to view their representations as “support”, nor that they should not be able to engage with the examination hearings.
- 4.3 Notwithstanding this, Merrow Wood have carefully tailored their position in respect of the Inspectors’ questions as relevant to their representations and respectfully request that this statement is considered at the Examination.



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## Appendix A - The site at Prospect Farm, Bosham

- A.1 The site at Prospect Farm lies within the Parish of Chidham and Hambrook, part of Chichester District, in West Sussex.
- A.2 The site extends to approximately 6.2 hectares and is a primarily level site of grass and mature trees and hedges which is divided into grazing paddocks.
- A.3 The site lies adjacent to the A259 Main Road/Cutmill View, approximately 1.3 kilometres west of Broadbridge, 0.8 kilometres east of Nutbourne and 1.6 kilometres north west of Bosham itself. The Portsmouth to Brighton railway line runs 90 metres to the north of the site.
- A.4 A location plan of the site is shown below.



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A.5 The site at Prospect Farm is relatively unconstrained in terms of general planning and environmental designations. It lies to the north of the A259, outside the Chichester Harbour AONB and ecological designations. The south eastern part of the site does fall within the 5.6km buffer zone from the Chichester Harbour designated sites, meaning that mitigation will need to be considered as part of a development. A very small part of the site adjoining the road lies within flood zone 2, however this is unlikely to affect its development nor access, albeit that this will need to be investigated further, and any impact confirmed as part of the full technical assessment of development.

A.6 Two indicative layouts for the site have been developed. Firstly a residential scheme with the following mix:

- 1 x Cafe / Communal Shop
- 5 x 5 Bed Houses
- 7 x 4 Bed Houses
- 15 x 3 Bed Cottages
- 49 x 2 Bed Cottages



A.7 Similarly, a retirement scheme mix is as follows:

- 1 x Cafe / Communal Shop
- 18 x 3 Bed Semi Detached Houses
- 31 x 2 Bed Cottages
- 4 x 2 Bed Semi Detached Houses
- 60 x Bed Nursing Home

