



9th October 2024

To: Philip Lewis BA (Hons) MA MRTPI and Johanna Ayres BA Hons

I would be grateful if you would accept my sincere apologies for the use of emotive language in my statement yesterday afternoon, using an excess of the Inspectors' time and, possibly, taking discussions off on a tangent.

However, the importance of site HWG0011 in Wisborough Green cannot be understated in that its inclusion in the HELAA generates a maximum capacity figure with which WGPC fundamentally disagrees given the inherent barriers to the site's acceptability for development.

At the time of submission of our written responses WGPC was unaware of Elivia Homes Eastern's submission that, it was felt, required detailed rebuttal, especially given the robustness of WG's track record on delivering Neighbourhood Plans, something that Mr Whitty confirmed yesterday afternoon.

We are attaching the words that we planned to deliver, with emotive words excised, and also links to the two CDC emails to which we referred in our written submission but to which we failed to provide a link.

Thank you for your patience.

Yours sincerely

Peter Drummond
Chairman
Wisborough Green Parish Council

Examination of the Chichester Local Plan 2021-2039
Oral Submission to Matter 4C: Housing
Cllr Peter Drummond, Wisborough Green Parish Council

I wish to address two issues:

- Elivia Homes Eastern's submission to this examination, and
- To add to WGPC written submissions, especially with regard to matters that have arisen during these hearings.

Turning to Elivia Homes Eastern's submission, especially relating to Wisborough Green, where Elivia is promoting one site: HWG0011 – Land East of St Peter's Church, known locally as the Glebe Fields. Site HWG0011 is not allocated within WG's extant Neighbourhood Plan.

The other site Elivia are promoting, HLX0004, is in Loxwood, that CDC has deemed a strategic location and therefore subject to different assessment.

In Autumn 2018 WGPC commenced revising its NP that, at CDC's insistence, had to reach Reg 14 stage by January 2020; at this stage the assessed requirement was for WG to find space for 25 houses. In 2020 WG's housing target was increased to 40, without explanation.

Site HWG0011 was included within the village NP consultations, scored poorly and was not included within the, now paused/abandoned, revised NP.

In March 2021, seeking to take advantage of CDC's inability to demonstrate a five-year housing land supply, Millwood Designer Homes, prior to takeover by Elivia, made a planning application for 25 houses on this site; although the site appears in the current HELAA, WGPC maintain the HELAA is flawed (detailed in document M4c.07 WGPC).

WGPC vigorously opposed Millwood/Elivia's application and a link to the PC's objection is included within our written submission; the grounds for objecting were robust, many and varied; the application attracted 153 objections from the approximately 700 homes within the parish). Millwood/Elivia subsequently withdrew the application.

It is within this context that Elvia's submission should be considered:

- We believe from their submission that Elivia surmise that their site will likely remain low on the pecking order of any future WG NP and consequently:
 - They want the DPA in the north east area to be increased, thereby increasing the chances of their site being necessary.
 - They suggest that the addition of a further 35 homes, or more, above the number of 40, added to the pre-January 2023 figure, would lead to the provision of bus services sufficient to obviate the need for unsustainable car travel; this is highly unlikely: the recent addition of 47 houses (Great Meadow and Songhurst Meadow) have had no beneficial affect at all on bus or indeed any other services.
 - They claim that there hasn't 'been a full audit of facilities available in adjacent authorities which could also serve the area', that is simply untrue; both CDC and WGPC are fully aware of the limited school places and GP

capacity and that any available GP capacity with the CDC area will be used up by housing developments in adjacent authority areas.

- At 2.3 in their submission Elivia claim that the 'HNBP then explains that the process and conclusions from testing a higher level of growth in the northern Plan area are outlined in the HDBP. This is disputed as the HDBP simply refers to paragraphs 4.127-4.132 of the R18 consultation document.'

However:

- their objection only holds water if one ignores the overarching premise that the driver of housing development in the north east area is an inability to locate it in the south.
- Items 4.127-4.132 set out the general limitations to development in the north east area.
- The potential improvements to, for example, sustainable methods of transport and the wider provision of services deriving from larger local developments, albeit in neighbouring districts, are only a long-term possibility and can be discounted within the immediate future.

- In their objection to Millwood/Elivia's, subsequently withdrawn, application for 25 houses WGPC stated

'Granting planning consent for this development will significantly undermine the Neighbourhood Plan process, potentially render the preparation of Neighbourhood Plans redundant and strike a major blow to local democratic engagement'.

So, in their submission, Elivia Homes takes issue with the Neighbourhood Plan process:

- They claim that 'no evidence has been provided to demonstrate that the delivery of homes through Neighbourhood Plans is effective in this location' despite:
 - CDC having previously highlighted parts of WG's NP process being an exemplar and commenting in the Sustainability Appraisal - Appendix V: Parish Scenarios: '...the Parish Council has a strong track record in respect of neighbourhood planning'
 - WG having efficiently taken its revised NP to Reg 14 stage
 - It being clearly spelled out that a failure in the NP process would lead to CDC allocating sites
- Further:
 - 'Elivia Homes do not consider that all components of the overall housing land supply are effective. This is on the basis that the proposed housing supply relies on dwellings being brought forward via neighbourhood plans.'
 - I paraphrase: Elivia Homes are concerned that the site they are promoting will not make it through public consultation in any new NP process.
 - 'There is no certainty that these neighbourhood plans will come forward or, where they do, that they will accommodate the growth required.'
 - WGPC would counter that having completed one NP and taken a revision through to Reg 14 is sufficient evidence that there is little uncertainty that a WG NP will 'come forward'.
 - The 'growth required' mentioned is a higher figure that Elivia believe would make their site essential.

- Elivia claim that 'In respect of the Northern Plan Area, it is recognised that due to the allocation of homes through neighbourhood plans, it is unlikely that any new growth could come forward in the first 5 years of the Plan Period.'

Elivia are only discussing two sites in the north east area, a strategic one in Loxwood and HWG0011.

In WG 'new growth' has already commenced:

- a site within the revised WG NP started on site the week before last
- and a planning application for another site, identified in the reviewed NP, has just been validated and is now in consultation;

their fears are demonstrably unfounded.

- Elivia continues: 'A further example of the risk associated with the allocation of housing via neighbourhood plans is contained at paragraph 4.30 of the HDBP whereby an Examiner concluded that the Southbourne Neighbourhood Plan was not in conformity with the adopted Development Plan. The Southbourne Neighbourhood Plan was subsequently abandoned and the housing requirement assigned back to CDC.' In other words, the process works.
- In endeavouring to demonstrate the 'risk associated with allocating housing growth through neighbourhood plans alone' Elivia cite, at 2.13, that CDC were obliged to adopt their Site Allocations DPD because 365 homes had not come through eight Neighbourhood Planning processes. This is not the case with WG which has an efficient and robust track record in Neighbourhood Planning. Elivia appears to want to abandon NPs because some parishes, not WG, failed to complete their NPs.
- Elivia's line of argument on the NP process is to seek to impose strict time limits on the preparation of NPs:
 - If 'demonstrable progress' has not been made on the preparation of NPs then CDC will allocate sites to meet the requirements of the Local Plan. Elivia are not happy with the phrase 'demonstrable progress'.
 - They then suggest an amendment to the draft Local Plan: 'If draft neighbourhood plans making provision for at least the minimum housing numbers of the relevant area have not made demonstrable progress reached a Regulation 16 consultation within 2 years of the Local Plan adoption or the neighbourhood plan is abandoned at any point following the adoption of the Local Plan, the council will consider planning applications favourably within the relevant Neighbourhood Plan area and will seek to allocate sites within a development plan document in order to meet the requirements of this Local Plan.' I paraphrase: if NPs are not produced within an artificially tight timescale then they expect applications to obtain swift approval.
- Elivia then take issue with WG PC more specifically (N.B. they are promoting only two sites one of which is in a strategic location):

- ‘Finally, it is clear through Parish Council meeting minutes that several are unhappy with the increased housing targets for their area. Given this, the production of neighbourhood plans could stall in an effort to delay or prohibit the delivery of homes in their areas.’

As has been amply demonstrated, WG possesses an efficient and engaged PC that are fully aware that if they fail to timeously produce a NP then sites will be allocated by CDC.

- ‘The SA details that Wisborough Green is able to accommodate up to 125 dwellings via Scenario 3 (Appendix V of the SA). This is greater than the number which has been assigned to Wisborough Green via Neighbourhood Plan allocations (75 dwellings). Scenario 2 and 3 detail the delivery of site HWG0011.’

I paraphrase: Elivia are keen that WG’s number is increased to increase the likelihood of their site being selected in the NP process.

WGPC has set out clearly why it believes CDC have erred in allocating 75 houses to WG based upon:

- The inherently unsustainable nature of any development in the north east area and
- The use of flawed HELAA data
- However, WG does agree with Elivia on two points:
 - No evidence to justify the population growth and corresponding housing need in this area has been provided.
 - There has been no assessment of the proposed growth level nor an explanation as to why this growth would score best against the SA objectives. Despite CDC claiming in their submission the distribution of development ‘has been underpinned by the Settlement Hierarchy (BP11), and evolved through testing of different options as part of the SA process’ they fail to supply or publish any of the test results in respect of the north east area.

Moving onto general points that have arisen from this enquiry:

- I appreciate that the housing numbers being discussed during this Inspection are large and strategic and that Wisborough Green, as a non-strategic location, appears far down the food chain. However, for the people of Wisborough Green, whom I represent here, the proposed new housing has a strategic effect on the village.
- One of WGPC’s overarching concern is that as a result of the need for housing development being in the southern area that is where CDC’s analysis has been concentrated and that the consequent allocation to the north east area generally, and WG specifically, lacks evidence; indeed, there is almost a total paucity of either background or detailed justification for how and why the housing numbers have been allocated:
 - Use of phrases like ‘it is fair to assume’ or ‘it is fair to rule-out’ without any supporting justification lend credence to this assumption
 - An over-reliance on flawed HELAA figures that are detailed in our written submission.

In this regard we realise that in our written submission we made reference to

the correspondence following Elivia Homes Eastern's pre-application enquiries for 65 houses on site HWG0011 but failed to include the source documents in the attachments, included here:

[Email 1 – Landscape Officer](#)

[Email 2 – Conservation & Design](#)

The summary of those: the Principal Conservation and Design Officer concluded *inter alia* that 'Any harm should be avoided or minimised (Para 190), including whether it is possible for the development to be provided in less harmful ways or on other sites' and the Landscape Officer that 'the proposals in their current form seem unsuccessful in achieving a landscape led and sensitive design approach. In summary the proposed development is not considered capable of support as it will bring forth adverse harm to the landscape character and visual amenity.'

WGPC have repeatedly made the point that this site should be excluded from the HELAA, it has inherent, and likely insurmountable, barriers to development especially of the scale considered within the HELAA and therefore fundamentally undermines CDC's case for the capacity of WG to accommodate the proposed overall number.

- There is a lack of identified local need
- It ignores contra-indicators:
 - Especially, but not limited to:
 - Unsustainability
 - Social and physical infra-structure deficiencies
 - CDC's own Conservation and Landscape Officers' reports
- The questions as to how the housing numbers allocated to WG were arrived at and justified remain unanswered.

For instance:

- An FoI request revealed that a briefing was delivered by AECOM on the 18th July 2022 which included the 75 housing scenario for WG and on 20th October 2022 CDC Officers gave a briefing to Members to ascertain views on numbers to include in the Submission.

As no minutes were taken nor notes made or retained it is impossible to ascertain whether analysis or justification was proffered with regard to the thinking behind the numbers.
- In the extant Local Plan and the consequent NP WG found space for 68 houses. If the 75 houses currently being proposed were added to this (143 houses) it would equal a 22.48% increase in the number of WG households within the Local Plan; the equivalent figure for Chichester city would be 2,981 additional households (based upon the 2021 census figure of 13,263 homes), growth that is not being attempted within the city confines. This is unsustainable growth for a small rural village without local services, or at all.
- What is more, in the Inspection sessions last week National Highways assessed that the A27 constraints, identified by CDC, were unnecessary and that the southern area could accommodate a higher DPA than the restricted 535 identified by CDC, obviating the need for overspill into the north east area.
- We are pleased that the Inspector is planning site visits and would urge that he takes due cognisance of:

- the distinct difference between the landscape to the south of the Downs and the land in the north east area; as well as being best located for services the former is far more suited to development than the latter's distinctly rural nature or as CDC say in their submission (1.9) to place 'the emphasis on maintaining the rural character of existing villages in the northern part of the plan area'.
- The lengthy travel distance/time to the north east area from Chichester and the north east area's inevitable remoteness.
- The fact that WG is unique within the north east area, it is a quintessential English village, focussed on its village green, partly within the National Park and if despoiled by incautious development this uniqueness will be lost forever.

WGPC has drawn the conclusion that the housing allocation for WG is unsound and ask that the Inspector either reduces the number to 40 or fewer or asks CDC to review the figure without use of flawed HELAA data and considering National Highways A27 assessment.