

Horsham District Local Plan 2019-36

Public Consultation (Regulation 18)

Responses from West Chiltington Parish Council

March 2020

Chapter 6: Housing Number Options

1. QUESTION

The work to understand the suitability, sustainability, delivery and infrastructure implications is ongoing and your views on these issues are important to us and will feed into the options that are taken forward for examination.

RESPONSE

West Chiltington Parish Council's concern which is fundamental to its objection to the Regulation 18 Local Plan is a lack of evidence to explain what infrastructure is needed to support the growth proposed for both the Strategic and Smaller Sites identified. The Infrastructure Delivery Plan is lacking in respect of evidence and therefore it is not possible to determine whether such growth and development is sustainable and deliverable.

West Chiltington consider the HDC Plan should be much more Infrastructure led and considerable work is required to demonstrate what and when Infrastructure is planned to be delivered. This is very evident as not available especially in the case of education, transport, utilities and Health Centres.

2. QUESTION

Which of the housing options above do you think the Council should set as our housing number?

RESPONSE

West Chiltington Parish Council Objects to Policy 14 and do not support any of the housing number options. The three options of (i) 1000; (ii) 1,200; (iii) 1,400 homes per year are all based on a flawed local housing need of 965 homes per year.

This is flawed on a number of counts. The growth rate is not based on the most up to date 2016 population projections. It is calculated using the highest household growth rate from the first 10 years of the plan and ignores the fall off in growth rates of households in the final 10 years of the HDC plan period. Source data of Housing & Planning Analysis Division DCLG.

All options include a 5% buffer, there is no evidence provided why this is needed especially when there is application of an Affordability Factor for Horsham District. This buffer is considered unnecessary and further inflating the housing number.

3. QUESTION

If you think the number should be different to the above what level of growth do you think we should provide? What evidence do you have for this?

RESPONSE

West Chiltington PC objects to the minimum number of homes 17,370 because the level of growth used to calculate the number of dwellings is too high and should be based on the 2016 household projections rather than the 2014 figures, and in contravention with Planning Practice Guidance. Evidence in support of this is taken from the ONS report August 2019 report on UK population. The report concludes a slowdown in population growth rates compared to the 2014 based projections. There is a material impact on population over the HDC plan period 2019 to 2036. The population is 0.6 million less in mid 2026 and 2.0million less in mid 2041.

4. QUESTION

What do you consider to be the challenges to this Council in bringing forward the increase in housing development to meet the Government's unprecedented change in housing growth?

RESPONSE

Horsham District Council as part of the plan development process should at the earliest possible stage identify the challenges and submit in the draft plan how they intend to overcome them. The NPPF para 16c states that 'plans should be shaped by early engagement'.

The first engagement by HDC with West Chiltington Parish Council has been by this Reg 18 consultation despite the fact that West Chiltington Parish Council Neighbourhood Plan is at a very advanced stage of Regulation 15 and had formally requested HDC for early engagement with them over the possibility of a very large development in West Chiltington Parish coming forward. This site is now identified and included by HDC in the Local Plan as Adversane 'Kingswood' without the early engagement requested by West Chiltington Parish Council. This seems to be the same position for other Parish Councils in Horsham District. Horsham District Council therefore have failed to meet the requirements of national planning policy.

West Chiltington Parish Council consider the Policy 14 housing provision is flawed. Nevertheless whatever housing number HDC seek to deliver at Regulation 19 a major challenge is to ensure the housing growth is deliverable, associated growth in employment is achievable and the developments are genuinely sustainable.

A major issue with delivering the housing growth is that control of development build out is in the hands of the landowners and builders and not with HDC. This is evident from the report February 2020 by Local Government Association (LGA) of 1 million backlog of homes with planning permission granted in the last decade and not yet built. One recommendation from LGA is “Councils need powers to tackle our housing backlog and step in where a site with planning permission lies dormant and house building has stalled”.

Delivering the necessary supporting infrastructure especially health and social facilities as well as education facilities and services represent significant challenges to ensure the housing growth is truly sustainable. The Local Plan must be Infrastructure led rather than housing demand led as it is presented at the moment. Transport is responsible for 46% and highest sector of the District’s total carbon emissions (para 9.2 HDC Local Plan) therefore HDC must demonstrate how they will genuinely reduce transport carbon emissions for sustainable development and contribute towards UK zero carbon.

The evidence presented by HDC in their Sustainability Appraisal does not demonstrate an outcome of reducing carbon emissions, on the contrary it presents a negative and possible harmful position on our environment and health. The HDC Reg 18 Sustainability Appraisal analysis shows Significant Negative Effects Likely for the SA Objectives; SA13 Transport; SA14 Air Pollution; SA15 Climate Change which in combination with the reported Significant Negative Effects on SA 6 Biodiversity and SA 9 Soil Quality leads to the conclusion that the local plan cannot be Sustainable Development.

Chapter 6: Potential Housing Allocation Options

5. QUESTION

What are your views on the site assessment process, and the potential development sites that are identified in this and the supporting documentation?

RESPONSE

The assessment process is flawed and demonstrably contradictory to the criteria used and the NPPF as a whole. The traffic light system particularly relating to Adversane has resulted in a perverse assessment and actually contradicts the criteria as identified in Appendix 1 of the Regulation 18 Site Assessment Report. For example, Landscape has been assessed as Neutral Impact and Biodiversity has been assessed as positive impact whereas within the site there are areas of ancient woodland which are subject to specific restrictions under the NPPF Section 175 (c) and the developer has also indicated that further work would be required as to protected species. Therefore the traffic light system against biodiversity and landscape would under the criteria elicit a RED traffic light. Thereby in both these regards the site is contrary to NPPF Chapter 15.

The developer has stated that 2000 homes will be delivered during the plan process, therefore, any infrastructure required is unlikely to be provided during this first phase and the promises of railway stations, hotels, shops, schools cannot be given any weight.

It is likely that in the duration of the plan that pressure will be placed on existing infrastructure which already cannot cope making the site unsustainable development.

Should development occur then it would result in isolated homes within the countryside and be contrary to the proposed Policy 29 on Settlement Coalescence.

It has been identified in the draft infrastructure delivery schedule 2020 that West Chiltington does not have the infrastructure to sustain the educational element of sustainable development for 25 homes let alone 2000.

The NPPF is clear that planning policies which lead to isolated developments in the countryside should be avoided. Insufficient evidence has been provided by either Horsham District Council and/or the developers who argue that this development would not be isolated.

Horsham District Council state that development on land which does not adjoin existing built up area boundaries and is not of significant scale to bring forward new services and facilities on site would lead to isolated rural development.

One could argue that this does not apply to Adversane, but it does because the speed of the development will be slow and therefore lead to isolation for a number of decades.

The infrastructure in Billingshurst will not cope, the GP surgery is very busy and has already been expanded, the schools are full, roads are barely adequate and have trouble coping with the current volume of traffic. The railway station car parks at Pulborough and Billingshurst are overflowing. The site is 3 miles from Billingshurst station.

Where are all the extra people going to work ? New development would be considered sustainable development if it was concentrated either in places where there are jobs, infrastructure and public transport already.

If the council were to approve this development then the council should insist the infrastructure is put in place first, new Primary and Secondary schools, Health Centres and railway station.

However, Horsham District Council have failed to provide sufficient evidence in support of their Site Assessments and are thereby denying true scrutiny of the strategic site of Adversane SHELAA reference SA597.

6. QUESTION

How do you consider these sites would bring forward development that accords with wider sustainable development principles that balances the need for economic growth with social and environmental requirements as identified in the NPPF?

RESPONSE

They do not. No evidence has been provided for the developers assertion at Adversane that there will be one job per household despite this a GREEN traffic light has been given.

In order to qualify as sustainable development the NPPF should be read as a whole and not in bit part. Economic growth and social and environmental requirements cannot be met with the Adversane site.

Would not accord with wider sustainable principles – in breach of SA13 “To reduce congestion and the need to travel by private vehicle in the District.”

In infrastructure terms, the only main road adjacent to Adversane site is the A29 which is a single carriageway road which already carries a great deal of traffic to and from the Sussex Coast with access to the A27, which in itself has traffic and infrastructure problems.

All other road access surrounding this site are small rural roads which would be overburdened with traffic finding shortcuts through local villages

Without any evidence then West Chiltington Parish Council would state they have not been consulted properly in accordance with Regulation 18 due to lack of evidence and information.

Chapter 6: Strategic Site Principles

Please consider the strategic site development principles set out in the draft policy above. We would welcome your views on whether this policy captures all the requirements that new development can provide, or whether there are any omissions. We would also welcome your thoughts as to how the requirements set out in this policy can be practicably achieved and how any obstacles that it may present can be addressed.

7. QUESTION

Do you think the draft policy captures all the requirements that new development can provide? If not what would you add?

RESPONSE

Yes.

However, under point 2 of Policy 15 any 10% net biodiversity gain MUST be achieved at the site location and NOT diverted elsewhere. Nature cannot be logistically moved like people and often habitats are formed over many decades. To simply remove them from a longstanding site would actually harm the natural biodiversity of a location. If a strategic site cannot underpin net biodiversity gain at the site locus then it would not be in accordance with the Government environmental bill nor be considered sustainable development in accordance with the NPPF; particularly Chapter 15.

8. QUESTION

How do you think the requirements in this policy could be practicably achieved? And how could we address any obstacles?

RESPONSE

By insisting that prior to any development infrastructure is provided in the first instance, ie facilities such as schools, health facilities and transport facilities rather than houses first putting the extra infrastructure under pressure.

Chapter 6: Smaller Site Options

9. QUESTION

Do you agree that smaller scale sites will also be needed to meet the Council's housing requirements?

RESPONSE

West Chiltington Parish Council recognises the National Planning Policy Framework 2019 has sought to diversify the housing requirement to increase the provision of small sites as part of the housing supply.

However, smaller sites should augment villages and small towns provided that they do not cause settlements to blend into one another.

It is well documented within the Evidence Base as part of the Local Plan Consultation that West Chiltington is a village in two distinct parts, this has been evidenced clearly through the draft plan both visually and in context.

Strategic Policy 29, Settlement Coalescence is particularly important to West Chiltington and its surrounding villages. This is further identified and supported within Horsham District Council Interim Sustainability Appraisal Evidence Base document as per the following extracts :-

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*"6.40 – There is also potential for a degree of coalescence to occur where new development would occur between settlements in the District. The areas surrounding the settlements in the District. The areas surrounding the settlements of Southwater and Horsham and, **West Chiltington Common with West Chiltington Village** have been noted to have potential sensitivities in this regard. "*

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*“8.16 – These requirements are expected to be of particular importance considering the rural character of the District. They may also help to address the identified potential for coalescence to occur in the plan area including at areas surrounding the settlements of Southwater and Horsham and **West Chiltington Common and West Chiltington Village**”*

It is noted that other identified sites within the draft Consultation Document proposing sites to the South of West Chiltington in Storrington Parish conflict with Policy 29 and the sensitivities of settlement separation. Storrington Parish has a made NP which also has a distinct green gap policy (policy 9) between Storrington and West Chiltington Common and it is crucial that this is maintained.

Therefore, the sites identified in the Local Plan consultation document, namely SHELAA Ref SA361 (land to the North of Melton Drive), SA732 (Land South of Northlands Lane) and SA639 (land off Fryern Road) are unsuitable and contrary to Policy 29.

Horsham District Council Interim Sustainability Appraisal Evidence Base extract:-

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*“B.246 – The findings of the Horsham District Landscape Character Assessment were built upon by the Council through the Landscape Capacity Assessment which is currently being updated to inform the Local Plan Review and is in draft form 265. The landscape capacity work also drew on working from the West Sussex Landscape Character Assessment and historic landscape characterisation data for West Sussex County Council. It was found that even at land which is very close to the settlement edges many landscapes are sensitive to development. Much of the landscape in Horsham is also in good condition, and strongly rural in character thereby making increasing its sensitivity to change. Land within a number of landscape character areas in the District also play an important role in terms of maintaining separation between these settlements. This includes land between Horsham and Crawley, Horsham and Southwater and between Storrington and **West Chiltington Common**. Some landscape areas also play an important role in the setting of a particular setting of a town or village, often creating a rural approach or feel to the entrance of a particular area”*

Therefore, maintaining the distinct separation of the two parts of the villages is very important to the settlement separation and the reasons set out in Policy 29.

10. QUESTION

Will the approach of allocating land for over 50 homes in the Local Plan help to provide certainty of delivery, particularly in the short to medium term? Should there be a different threshold?

RESPONSE

The Reg 18 Local Plan does not provide evidence that a specific threshold of 50 will provide certainty of delivery. However, it is recognised that HDC is required to develop policies to help with certainty of delivery and to reduce the control of developers with regards to build out rates. Therefore the Parish Council consider HDC setting a threshold of 50 is probably of an appropriate size to be in the Local Plan and may help to improve deliverability.

Consequently the Parish Council wish to make clear that this means any site falling below the 50 dwellings threshold would be covered by the Neighbourhood Plan process. Therefore in accordance with the Localism Act 2011 it will be for the local Parishes to best determine where small sites are appropriately located to ensure a cohesive integration into a particular village infrastructure.

This question contradicts the small site allocations suggested for the Local Plan. It is noted that the following locations have sites suggested which fall below the “approach for allocating land for over 50 homes in the local plan” and it, therefore, follow that any sites identified at the following locations should be excluded from the Local Plan process:-

West Chiltonington (25)

Christ’s Hospital (30)

Lower Beeding (35)

Small Dole (Henfield Parish) (20)

11. QUESTION

Do you consider this approach will allow existing neighbourhood plans that are undergoing preparation to be completed and minimise the need for them to undertake a review in the short term, whilst allowing the opportunity for communities to do this if they wish? Do you have any suggestions for a different approach?

RESPONSE

The Reg18 Local Plan does not provide certainty for parishes wishing to have a voice in determining the best use of land for their communities and complete their Neighbourhood Plan.

The Parish supports the different approach outlined in the previous question response. This is for HDC allocation of potential land for above 50 homes and for allocation of land below 50 in Neighbourhood Plans. Neighbourhood Plans would be subject to review under the relevant legislation and Localism Act 2011.

The HDC Reg18 consultation section 6.33 says ...” it is therefore likely that our strategic housing allocation policies will need to identify land in villages for developments of 50 homes or more in addition to Neighbourhood Plan sites”.

There are 35 sites identified in the Reg 18 Site Assessment Report (Feb2020) and included in the Local Plan 2019-2036 for consultation with housing number less than 50 of which around a third are sites of and below 15 homes and some are as low as 6 and 8 homes.

The Parish Council consider that developments of this size and number of homes are not strategic and more suited to consideration by Neighbourhood Plans.

Allocation of these 35 sites is in contradiction to section 6.33 HDC Reg 18

Therefore sites of less than 50 should not be included as part of the HDC Local Plan and be considered as part of Neighbourhood Plan site assessment and allocation.

These potential sites for allocation will still therefore contribute towards HDC housing provision but through Neighbourhood Plans rather than HDC Local Plan.

It is the strong view of West Chiltington Parish Council that the identified sites in the draft consultation Local Plan below 50 should be considered at neighbourhood planning level.

12. QUESTION

What are your views on the shortlisted sites and the proposed housing number for each settlement?

RESPONSE

As the sites for West Chiltington fall well below the indicated threshold of allocation within the Local Plan it is expected that the sites will come forward during a “Call for sites” under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 and that is where views and independent assessment should stay.

However, the following observations are initially made on the two sites identified by Horsham District :-

SHELAA ref SA066 – Land at Hatches Estate

The site area is quoted as 4 hectares but this is **incorrect** it is actually 0.845 hectares as indicated on the map in their DLP within the site assessment.

Therefore, it is quite conceivable that any conclusions made by HDC are incorrect as the proposed site is much smaller than stated.

SHELAA ref SA429 – Land at Smock Alley

This site is outside the built up area boundary and forms the settlement gap between the two areas of West Chiltington as specifically identified by HDC in their Evidence Base under sections 6.40, 8.16, B.246 and has been extensively tested at Secretary of State stage under Appeal References APP/Z3825/W/15/3022944 (DC/14/2248) and APP/Z3825/W/16/3146231 (DC/15/1389).

13. QUESTION

Do you consider that, if supported by viability evidence, the target for providing affordable housing on housing sites should be increased? If so, what % of affordable housing should the Council be seeking?

RESPONSE

To clarify, affordable housing includes key worker housing and shared ownership. It is housing provided with a subsidy to enable the sale price to be lower than the prevailing market prices ie often 20% lower than market value.

In Horsham shared ownership properties are being sold for:

2 bed apartments £85,500 with 30% share

3 bed houses £231,000 with 70 % share

A brand new house on the Highwood estate sells for £330,000

The district, and our parish in particular, needs one, two, and three bedroom dwellings - not more four bedroom dwellings and executive homes. The evidence demonstrates that there is a plethora of executive homes on the market which are just not selling. Housing needs to be delivered which addresses our local residents' needs, in particular for older residents (downsizing) and young families (affordable).

14. QUESTION

Should the Council seek to use the threshold for affordable housing of 10 dwellings on all sites? Are there occasions when it may not be appropriate and if so, what should the threshold be?

RESPONSE

We do not feel it appropriate to have a threshold for affordable housing, but rather, the % based calculation is appropriate for both small and large developments and that different %'s should be set by the Council for a range of development sizes i.e below 5 houses, 5-10 houses, 10-20 houses, 20-40 houses, 50 –100 houses, 100+ houses, 1000+ houses etc.

Therefore, the target for affordable housing on housing sites needs to be set depending upon the size of the development.

The Council also needs to have the powers to enforce these %s with developers. At present it is clear that housing type is being developer driven and not affordable housing driven.

Chapter 6: Gypsy and Traveller Accommodation

15. QUESTION

Do you agree with the draft policy on Gypsy and Traveller sites? If not, please give details as to why not or how the policy could be changed.

RESPONSE

In principle the draft policy covers some of the requirements as identified in the DCLG Planning Policy for Traveller Sites document dated August 2015. However, HDC should also make provision under Section 3 of the proposed Policy 24 the following as outlined in the PPTS:-

13 (e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well being of any travellers that may locate there or on others as a result of the new development – **this would add further protection and robustness to Policy 24 Section 3 (d)**

13(f) avoid placing undue pressure on local infrastructure and services – **this would give effect to ensuring inappropriate locations being chosen and the density of such sites**

16. QUESTION

In terms of meeting the identified need for Gypsies, Travellers and Travelling Showpeople, do you agree with the approach of intensifying existing authorised sites, if required, in addition to identifying a number of strategic and non-strategic sites?

RESPONSE

Only if they do not result in an inappropriate intensification at those sites contrary to the guidance given in the PPTS. A mix of strategic and non-strategic sites should strictly comply with Sections 13(a) to (h) of the PPTS – section 13 (a) promote peaceful and integrated co-existence of the site and the local community is the bedrock to ensure (a) sustainability of the site.

It is not desirable that multiple remote single sites in rural countryside be identified as this is contrary to the PPTS and the proposed Policy 24.

17. QUESTION

If possible, do you think that the Council should allocate all identified need on a number of new sites? Should these all be strategic (1000 dwellings +), or a range of large and smaller sites?

RESPONSE

Yes the Council should allocate all identified need on new sites and yes these should all be allocated to strategic (1000+ dwellings) sites as this would appear to fulfil the guidance of Section 13 of the PPTS and prevent sporadic inappropriate sites throughout the district.

Chapter 7: Green Belt Designation

18. QUESTION

Do you agree that we should consider whether the designation of Green Belt may be appropriate in this District?

RESPONSE

Yes it would be worth conducting a very careful review to ascertain whether there are small areas of green belt, for which designation is appropriate. Conversely it should be ascertained whether there are other similar areas that are not green belt that should be designated green belt.