

Shipley Parish Council

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Mrs Catherine Howe
Head of Strategic Planning
Horsham District Council
Parkside, Chart Way
Horsham RH12 1RL

28th November 2019

Dear Catherine,

Objection - SA716 Land at Newhouse Farm

We write in relation to SHLAA Site SA716 Land at Newhouse Farm following recent presentations and information received from Thakeham Homes the promoters of this land as a strategic site for 3,500 new homes. We have learnt that the Council are considering including this land within the issues and options Regulation 18 stage of the new Local Plan. As a result, we wish to register our early objection to the inclusion of this site as a suitable housing allocation.

We whole heartedly endorse and support the letters of objection that have been written by West Grinstead Parish Council, Nuthurst Parish Council, and the Weald Cross Action Group. We note that West Grinstead Parish Council and Nuthurst Parish Council has written to you jointly in opposition of this proposal and this letter provides objections from the Shipley Parish perspective and aims to add further information to those submissions.

Background

Land at Newhouse Farm was submitted and assessed in the 2018 SHELAA process (SA716). It was noted within the justification that a Planning Consultant on behalf of the landowners had expressed an interest in developing the site, which led to it being considered 'available' in the SHELAA. The assessment recognises that the site contains a number of constraints such as areas of Ancient Woodland, Public Rights of Way and the River Adur which runs through it from the north to the south incorporating land at risk of flooding (Flood Zone 3). It also recognises that although it lies within the West Grinstead Parish Neighbourhood Development Plan Area no Draft Neighbourhood Plan had been published at that date. Although, as we all know later, the Draft Neighbourhood Plan makes no reference to it. The SHLAA Assessment states that it would need to be considered as a new settlement if it were ever able to come forward and given the lack of evidence to demonstrate that it would ever come forward as a sustainable development and not cause significant harm it would be contrary to policies and considered to be not currently developable unless allocated through a Local or Neighbourhood Plan. It was therefore excluded from consideration at that time.

Subsequently, in the last couple of months we have received a presentation and draft proposal from Thakeham Homes to develop the land for 3,500 homes. The 'vision' as they call it would include:

- A new flyover junction on the A24;
- Park and Ride Scheme;
- A mix of affordable homes;
- Three new schools including two primaries and one secondary;
- 3000sqft of retail floorspace
- Additional employment floorspace;
- 20ha of public open space;
- Medical centre and pharmacy;
- Family pub and restaurant;
- Community Building.

The Vision lacks any kind of detail at this stage to show where housing might go and a sketch drawing of highways arrangements. The Vision document contains one page on deliverability and just states that it will be promoted through the Local Plan with a start on site in Autumn 2023, estimating that they could deliver upwards of 300 dwellings per year. This document alongside the presentation that we have seen from Thakeham Homes is severely lacking in detail and is woefully short of the evidence required to demonstrate that a new settlement can be sustainably developed in this area. Therefore, if the Council are seriously considering putting this in the Issues and Options of the emerging Local Plan there must be a significant amount of evidence that is not publicly available at this time to support it. If that is not the case then the Council should not even consider including it in the Issues and Options document. We would welcome the opportunity to review any other further evidence that the Council may have, in the spirit of early consultation as required by the NPPF.

We have scrutinised the detailed information from Thakeham Homes' proposals below, but firstly as the starting point for any Local Plan the broader context of allocating land for housing should be led and guided by the NPPF. Chapter 3 of the NPPF sets out guidance on plan-making. Paragraph 16 states that plans should be prepared with the objective of contributing to the achievement of sustainable development, be prepared positively in a way that is aspirational but deliverable, be shaped by early, proportionate and effective engagement between plan makers and communities. Thakeham Homes' Vision as it stands, and in the context of the SHELAA Assessment would not contribute to the achievement of sustainable development. This is explained later in specific issues. The proposal would certainly be aspirational but on the evidence that we have seen clearly under-deliverable. Delivering 300 homes per year is an extremely high delivery rate and we question whether Thakeham Homes have ever achieved this and indeed can achieve this each year for 15 years over the Local Plan period. For the Local Plan to be shaped by proper early, proportionate and effective engagement between plan makers and communities we would expect the Council to share any further evidence they might have to support the inclusion of this site with the Parish Councils.

Non-Compliance with Current Local Plan

Notwithstanding the fact that the Local Plan will be creating new policy the proposals would clearly not comply with numerous existing policies within the HDPF 2015. This non-compliance has been outlined succinctly within Nuthurst Parish Council's letter dated 18th November 2019 and so we have not gone over this within our letter. However, it is clear from this that if this proposal were to be put forward for allocation within the Local Plan a

large number of current local policies in the HDPF would need to be reviewed in light of this and all would require specific and significant evidence to support them.

The HDPF 2015 when it was put together included as most other Local Plan's include, a broad area of search for strategic sites based on the constraints of the District. This broad area search concluded that North of Horsham, Southwater, Billingshurst and existing top tier settlements in the District is where the focus of development should be. There is no reason to believe why this broad area of search for strategic sites based on constraints would be any different for the Local Plan in 2019. In fact, it is potentially more relevant now in 2019. Looking at the wider strategic trends in the District and beyond spatially the focus for employment and investment is in the north of the District towards London and along the A23 corridor, picking up Gatwick as a key employment area, Brighton to the south and within the next few years Burgess Hill Northern Arc adjacent to the A23 as a key area for growth, employment and homes. This is complemented by the Brighton mainline which has quick and regular links in to and out of Brighton and London. The focus for future development and growth should be along the A23 corridor and not along the A24 where there are limited settlements, services and infrastructure including rail. Key commuting figures show that in the south of Horsham District a large proportion of the population commute northwards towards London and Gatwick or south to Brighton and the coast and in the future east to Burgess Hill.

As a result, if this proposal was to go forward it would be in an area where there would be heavy reliance on private vehicle to get to these key locations. Looking at Census data from 2011 there will be more CO2 generated by having a south-west Horsham development versus a northern/north east location. The Census estimated that 43,221 Horsham residents drove to work everyday and the average journey to work was a distance of 12 miles or a round trip of 24 miles. This distance will have increased significantly since then because we have not been generating enough District jobs and many large housing developments in the northern A24 corridor are in place where there is minimal work and cars are virtually the only way to get there. In other words, building houses in the A24 corridor in the south of the District where there is no work nearby will simply exacerbate global warming.

Specific Issues

Turning to specific issues with Thakeham Homes' proposal, the 'suite of benefits' that the development proposal states that it will provide it is difficult to assess the proposal as it is with such a lack of detail or evidence to go with it. However, Thakeham Homes have placed the full access burden of 3,500 homes on to potentially one junction. The current Buck Barn junction is a well-known traffic hot spot within the District being regularly congested at peak times. West Sussex County Council have looked at addressing the Buck Barn crossroads issues on a number of occasions over a number of years and each time it has been shelved as potentially too expensive. The cost of highway schemes is immense and a new junction at this location to accommodate the existing traffic and traffic from 3,500 homes to include a flyover would be extremely costly. Not only would the cost of improving the existing junction and erecting a flyover be extremely high, the knock-on impact of this type of proposal on the A24, particularly to the south would require further investment and money. This is one of the reasons why the Buck Barn junction has not been forthcoming. We would expect that this alone could potentially render the scheme unviable. But it should also be noted that in the context of everything else Thakeham Homes are proposing as benefits for the site and we question where any of the money for this would come from. In reality what would happen is that the site would end up with 3,500 homes and little in the way of any supporting infrastructure that would enable it to be a new settlement as required by the SHELAA Assessment.

Conclusion

In summary, the proposal as presented and we would argue in any form in this location would be completely unsustainable and go against the future patterns of strategic growth at both a District Level and Regional Level. It would decimate the rural nature of this area and the rural character of Shipley Parish. We strongly object to any inclusion of a new settlement in this highly unsustainable location. We would hope that the Council would agree with this and not include it in the Issues and Options Local Plan, but if it is included, we as a Parish will oppose it. As set out earlier we would request that if the Council has any more information to support this proposal in the Plan that they are transparent at this early stage in accordance with the provisions of the NPPF and share it with the Parish Council prior to the publication of the Local Plan.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Richards', with a horizontal line underneath the name.

Paul Richards
Parish Clerk and Responsible Officer
Shipley Parish Council