

Shipley Parish Council

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Dear Catherine,

HDC LOCAL PLAN – REGULATION 18 CONSULTATION RESPONSE.

Please find attached our response to your draft Local Plan.

Shipley Parish Council does not support developments anywhere where there is limited infrastructure that will itself need major development; developments of any kind in “the middle of nowhere”; developments that are away from the key housing areas and jobs; or developments which are likely to damage the already fragile environment by increasing pollution – especially through increased levels of carbon dioxide and nitrous oxide which will undoubtedly result from substantially increased numbers of houses and the increased number of vehicles that will be consequent upon that.

As a Member of the Horsham Association of Local Councils (HALC) which represents 31 of the 32 Parish Councils and all three of the Neighbourhood Councils in the Horsham District – and so, the 142,000 people who live there – Shipley fully supported the sentiments expressed in the letter which HALC sent recently to Horsham District Council (Councillors Dawe and Vickers) asking that the housing numbers demanded of the Horsham District by the government, be challenged. That is not reproduced here but it is relevant to the detailed response set out in that attached paper.

Yours sincerely,



Paul Richards
Shipley Parish Clerk

Shipley Parish Council Representations – HDC Local Plan Regulation 18 Consultation

Introduction

Shipley Parish is an area of special rural character in the heart of Horsham District. The Parish Council strongly objects to the imposition of any new settlement in this unique rural area – and especially to one immediately adjacent Shipley Parish. The impact of developments such as this would permanently alter the character of Shipley and create numerous consequential negative effects on the Parish; and in particular, on the limited infrastructure, landscape value, ecology, air quality and the existing communities. It would also site development away from the areas that are seen as key areas of housing need and growth- and away from jobs.

We believe that the Council's development strategy should remain consistent with the historic evolution of the District and grow with the expansion of existing towns and settlements, to ease the undoubted pressure on existing infrastructure and services that a large increase in housing will bring, whilst retaining the unique character of the District as far as possible. Under-researched and under- evidenced allocations of new settlements would be contrary to this with higher infrastructure costs, skewed working and commuting patterns, increased loss of important landscapes and ecology, and the complete erosion of the historic character of the District.

We have provided our comments and objections on the Council's overall development strategy and allocation of the Land at Buck Barn (Wealdcross) within this statement below – but they apply equally to proposed developments anywhere within the Horsham District and especially those adjacent Shipley.

Chapter 3 & 4 – Spatial Vision and Policies for Growth and Change

The spatial vision for the development of the District in Chapter 3 acknowledges that the development 'strategy has to accommodate change but the emphasis is on respecting the distinctive local character wherever possible' (para 3.18). It also 'seeks to ensure that the strong identities of Horsham town and our long-established rural communities are retained and the pressure of additional development does not create additional pressures on existing infrastructure and community facilities.' (para 3.19). The development hierarchy is proposed to remain similar to the current Local Plan hierarchy to reflect the fact that the 'historic pattern of development in Horsham District has focused on the growth of existing towns and villages' (para 3.23). The strategy 'seeks to continue to support development that takes place in and adjoining the most sustainable villages and towns in our District' (para 3.23).

Shipley Parish is generally supportive of this approach, when it has been established that development is needed, as a sensible and tested way of accommodating growth; however, the strategy argues that to accommodate the increased level of growth to meet housebuilding 'aspirations' it is 'expected' that the development of new settlements in the District will be required. We have commented below on the housing requirements for the District and the balance that needs to be struck between accepting neighbouring authorities' housing needs with the need to retain the character of the District. We have also commented below on the viability of new settlements in the District (Land at Buck Barn in particular) and the need for a complete step-change in infrastructure provision alongside a distinct lack of evidence to support any notion of delivering such a development within the

plan period. Horsham Association of Local Councils has already questioned the basis for the assumptions made and asked to know where is the evidence for the level of demand 'expected'.

However, as a general strategic comment the thrust of the Local Plan seems to be (as noted above) aiming to build on the historic settlement expansion of the past to accommodate new development (indeed the majority of the assessed need can be met through the proposed allocations that are settlement expansions in the Plan) and the requirement of new settlements looks like an afterthought to try to provide choice and a buffer for increasing housing pressures from London and adjacent authorities which, in the opinion of Shipley Parish Council, is not sustainable – in particular, because the infrastructure is inadequate, as are proposals to improve it and the plans are environmentally unsustainable (considering in particular the levels of Carbon Monoxide and Nitrous Oxide that have been estimated. At present every new house built in the Horsham District contains on average one and a bit workers. All have to commute from the District to work. Evidence suggests that most will commute by car. Burning 1 litre of petrol generates 2.31kg of Carbon Dioxide (CO₂): 1 gallon generates 10.5kg – and Diesel generates 12.2kg – so a petrol-driven car, which does 30mpg, driven for 30 miles, produces 10.5kg of CO₂. The 2011 Census estimated that 43,221 Horsham District residents drove to work daily and the average journey to work distance was 19km (12miles) or a round trip of 24 miles so, over a working year (say 235 working days) these residents driving a car which did 30mpg would burn 8 million gallons of petrol – and generate 85,000 metric tonnes of carbon dioxide.

The strategic policy for settlement expansion (Strategic Policy 3) under Chapter 4 Policies for Growth and Change that focuses on the location of development in the District ensuring that 'the settlement function and pattern of the District is retained, keeping the rural character of the District beyond these settlements' (Para 4.9) is adduced as evidence to accommodate expansion as described. In complete contrast to this there is no specific strategic policy on new settlements, just a cursory sentence within the settlement expansion policy recognising that 'to meet the government's step change in housing numbers, a new settlement may also be required' (para 4.9). Elsewhere, there has been a suggestion that this could lead to some 17,370 houses during the development period, as a consequence of a projected increase of 17,658 in population – which makes little sense (and has been challenged by HALC).

Shipley Parish Council supports a spatial strategy that mirrors historic growth patterns and accommodates housing requirements through the expansion of existing settlements whilst respecting the rural character of the District. This draft Local Plan seems to reflect this, but it should now be more clearly expressed in the next iteration of the Plan. **Development needs should be accommodated and allocated to existing settlements and the unsubstantiated proposed new settlement allocations removed.**

District Housing Provision (Policy 14)

The policy states that a minimum local housing need in the District has been calculated at 965 dwellings per annum (still including some crossover which Crawley BC is said to need). Upon reviewing the SHMA and housing evidence base, the demographic projections forming the basis of the calculation seem reasonable in relation to purely the number needed in the District when looking at the Northern Western Sussex Housing Market as a whole. However, when it comes to the Local Plan the strategic distribution of housing to meet this need has to be reflective of where the demand actually is on a local level. It also needs to take into account all other potential constraints that would inhibit the ability to meet the need sustainably.

The options set out in Draft Strategic Policy 14 provide options for housing growth based on the calculated need. **The overall level of housing provision for the District should be option 1 providing no more than 1000 homes per year, to meet the local housing need and not the higher level to meet the unmet needs elsewhere.**

We understand that a 5% buffer provides a degree of flexibility on delivery. However, this should be used as a very last resort. We would expect that by the time that the Local Plan is adopted Horsham District Council will have been provided with enough information to be confident that the allocated sites and housing numbers that it proposes will be delivered within the plan period. It is highly doubtful that any entirely new settlement could be viably delivered within the plan period and judging by the current available information a large amount of work will be required to prove otherwise.

The minimum level of housing is likely to have some impact on the historic and rural character of the District. Any more houses to meet potential needs elsewhere, should be weighed against the need to retain the character of the District, the significant development of infrastructure that would be required (and which would likely change that character significantly) as well as the environmental effects of the influx of significant numbers of people, their vehicles and the use of vehicles that would be generated to support the new developments.

The minimum level of housing growth would at least allow for development which is more in keeping with the historic growth pattern of Horsham District is as required by the spatial strategy, focusing on the growth of existing towns and villages as has historically been the case. This model of strategic growth, as noted above, should also be used when approaching the distribution of housing allocations in the District, to focus development on where the local need is greatest i.e. generally in the north of the District and in existing settlements as set out in the SHMA; and where there is least impact on the character of the District.

In accordance with the spatial strategy existing settlements should be looked to for development in the first instance and then followed by investigating the potential for new settlements within the District.

The Draft Local Plan states at paragraph 3.19 that the 'strategy seeks to ensure that the strong identities of Horsham Town and our long-established rural communities are retained and the pressure of additional development does not create additional pressures on existing infrastructure and community facilities.'

The best way to reduce pressure on existing District infrastructure is to invest in upgrading existing infrastructure as development comes forward in the towns and villages as per the development hierarchy. This will reinforce the strong identity of the Town and existing rural communities.

The introduction of entire new settlements which bear no relationship to the existing settlement pattern of the District and do not reflect where the actual housing need is, will require a clear step change in local infrastructure provision and public transport investment that will bring large costs and will not contribute to resolving the existing pressures that exist within the District. **As such, any entirely new settlements would not be a sustainable option for development and would not meet the vision that is put forward within the**

Draft Local Plan of retaining a strong identity for the existing towns and villages in the District or Chapter 3 of the NPPF on sustainable plan making.

Strategic Site Development Principles (Policy 15)

Strategic Policy 15 sets out strategic site development principles that new site allocations will need to meet to be supported. The development principles 1-9 highlight principles such as design, biodiversity, zero carbon and services and facilities.

Shipley Parish raises serious concerns about how entirely new settlements have been considered in formulating this policy. There is no policy in the draft Local Plan which specifically provides guidance for entirely new settlements or developments which do not adjoin an existing built-up area boundary. Therefore, there is a disconnect between the strategic growth policies and the potential strategic allocation of any new settlement – such as Land at Buck Barn (Wealdcross).

Whilst the principles within Draft Policy 15 are relevant for a settlement expansion development when considering a planning application, there is no consideration of the potential suitability of locations specifically for entirely new settlements and how these new settlements will be able to integrate successfully into the existing community as well as how they will be sited to meet actual (rather than hypothetical) identified housing needs.

Any new settlement has the potential to provide a significant volume of new housing for the District. However, each new settlement also needs to be well located in order to meet those identified housing needs and in relation to existing infrastructure provision. **If the justification for a new settlement is required in part to meet the needs of adjoining local authorities then the settlement should be positioned accordingly in order to meet those identified needs.** We have addressed this below, using the proposal to develop land at Buck Barn, West Grinstead (Wealdcross) by way of example – but the broad principles hold good for every proposed new settlement.

Strategic Allocation - Land at Buck Barn, West Grinstead (Wealdcross)

As outlined above there is a clear disconnect between the draft Local Plan's spatial strategy for the District and the proposed allocation of new settlements. This is epitomised by the proposed allocation of Land at Buck Barn, West Grinstead (Wealdcross). **Not only is this proposed allocation out of step with a sensible spatial strategy for the District, but it is also located away from the key areas of housing need and growth.**

Strategically, the focus for employment and investment in the District is in the north of the District towards London and along the A23 corridor, Gatwick being a key employment area, with Brighton to the south and Burgess Hill Northern Arc adjacent to the A23 being a key area for growth, employment and homes. This is complemented by the Brighton mainline which has quick and regular links into and out of Brighton and London. **The focus for future development and growth should be on these key areas 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 commutes northwards towards London and Gatwick or south to Brighton and the coast and in the future, east to Burgess Hill.

The result of locating developments in places away from identified need with limited existing infrastructure and facilities will be an immense negative impact on the area.

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; and be shaped by early, proportionate and effective engagement between plan makers and communities.

The Land at Buck Barn (Wealdcross) clearly does not fulfil the guidance set out in Chapter 3 on sustainable development; and similar considerations apply to some other areas of proposed development (for example, Adversane).

Potential Impact

The Land at Buck Barn, West Grinstead (Wealdcross) was submitted to the Local Plan for consideration at a very late stage in the preparation process.

The site 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.

There is, however, a distinct lack of specific information or evidence in the draft Local Plan to explain how any development on the site will overcome the significant constraints and infrastructure requirements needed to make it sustainable under the NPPF's definition. The visioning document set out by Thakeham Homes prior to the publication of the Local Plan shows a very high-level masterplan and states that all constraints and issues will be dealt with as part of any forthcoming proposal.

The impact of a standalone settlement in the middle of the countryside will be huge and in order to fully assess this the Council and the local community need much more information on how the impact of any development could be mitigated. There are many impacts to focus questions on **but the large and pressing ones are transport and infrastructure, ecology and landscape character.**

The Land at Buck Barn is accessed via the A24 and A272 only and is some distance from any railway stations. Therefore the primary method of transport would inevitably be the private vehicle. The A272 currently carries 21,000 cars a day and is at capacity as highlighted by the congestion in Cowfold at various times of the day. Additional and continuing housing developments along the A272 (Billingshurst) will only add to that. The large influx of cars would therefore have a huge impact on the surrounding roads exacerbating congestion and pollution – a significant factor which must be taken into account in any development plans (witness the recent High Court decision on expansion of Heathrow airport). The developer has suggested a park-and-ride scheme to alleviate this but has provided no details as to how it might work, where it would be located, the times at which it would be operating or who would use it in practice.

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 every day 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.**

There are so many unanswered questions about the potential impact on the current infrastructure and traffic flows in this area. What is clear is, that **if the Council were to contemplate any development in this location it would require a major coordinated improvement in public transport links across the whole of the area. This must be a pre-condition of any new allocation anywhere in this area.**

In terms of impact on landscape and ecology a development of the scale at the proposed site has the potential to cause significant fragmentation of existing habitats and put in place barriers to adaptation of species to climate change.

The overwhelming conclusion of the Lawton Review of England's protected areas and ecological network (Lawton et al. 2010) was that the current network of statutorily protected sites in England does not comprise a coherent and resilient ecological network. This alone will not reverse declines in our wildlife, and we need large-scale habitat restoration outside of protected sites to help link them and to improve the quality of the wider countryside for a broader range of species.

A desk-top ecological study has been produced for the site. The assessment identified extensive areas of the site as Habitat of Principle Importance (HMSO 2006; Defra 2020): predominantly deciduous woodland, but also small areas identified as semi-improved grassland and traditional orchard. Alongside this the site was assessed as having high potential to support Badger *Meles*, breeding birds, Great Crested Newt *Triturus cristatus* and reptiles; moderate potential Hazel Dormouse *Muscardinus avellanarius*; and low potential for Water Vole *Arvicola amphibius*.

Until further surveys are undertaken it is not possible to provide detailed mitigation, compensation and enhancement measures that would be necessary at the site, but there

are clearly many ecological constraints that will need to be addressed as part of any development proposal.

It is likely that the development area of the site would be significantly reduced to take account of the important habitats and species mitigation areas. Where it is proposed that habitat be removed and compensated for with replacement habitat, it must be realised that the timescale to develop ecological interest can be considerable; and larger areas than that lost should be provided to reflect this. **Therefore, an impact on the developable area and also the timescale for delivery would be inevitable.**

Overall, with such a lack of supporting information it is difficult to assess fully, the enormous impact that this development would have on a small rural community, (and there are at least three affected by this proposal alone – Shipley, West Grinstead and Dial Post) **but it would clearly result in a significant change to the character and functioning of the area and a complete change to ecological habitats that will need to be mitigated.**

Viability

There is a lack of specific information or evidence in the draft Local Plan to explain how any development on the site will overcome the significant constraints and infrastructure requirements needed to make it sustainable under the NPPF's definition. There is also no indication as to whether anything that is being proposed would be viable, particularly as the now 2,000 – 2,500 homes proposed for the Wealdcross site is 1,000 short of the number being proposed for the site prior to the production of the draft Local Plan with no change to the proposed infrastructure needed to support it.

Being a standalone site, significant infrastructure would need to be provided up-front to enable the function of the development. The full access burden of the new settlement is proposed to fall onto one road 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 has 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 a new settlement 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 significantly upgraded previously. **We would expect that the provision of the junction infrastructure alone could potentially render the scheme unviable.**

The site assessment that has been completed by the Council has rated the site 'green' for education, health and leisure – this appears to be solely on the basis that the developer has indicated that they would have the potential to build a new school and would offer land for healthcare and leisure facilities. There is no additional evidence or figures available to support these assertions that have been made by the developer, which could significantly undermine the viability of a development in this location.

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). All of these constraints will erode the developable area and impact on the development costs.

The Parish Council has serious concerns about the viability of this proposal and the lack of information submitted with the draft Local Plan undermines the plan making process.

Deliverability

The number of homes that the proposal would be able to deliver would provide a boost to the house numbers of the District. However, there are considerable question marks over whether this number of homes could in fact be delivered within the plan period bearing in mind the potential up-front infrastructure requirements. Furthermore, this development is proposed to be fully developed by a single developer, Thakeham Homes.

It is extremely unusual for a developer to build out a site of this size on its own. Shipley Parish Council is highly sceptical about this as it is contrary to general commercial development principles and would not be best value for the developer or provide the range of homes, styles and range of costs required to make the development a successful new settlement. Thakeham Homes is a developer with very limited experience of building at such a large scale, to provide the said number of homes across the plan period whilst also meeting the numerous infrastructure requirements of a new settlement.

Climate Change (Policy 37)

The Parish Council finds that the strategies relating to environment, climate change and flooding fall short of exemplars in the county. For example, the SDNPA environmental strategies and thresholds could provide a useful comparison for HDC to draw on. This alignment of environmental policy is particularly important to BPC, which is partly located in the national park. Further, it is not consistent with the national commitment and policy as it fails to take into account the UK's legal obligations to meet the requirements of the Paris Agreement and its legally binding requirement to reach net zero carbon emissions by 2050.

The Parish Council welcomes the commitment to identify a Nature Recovery Network towards which future development will be expected to contribute. The Shipley Neighbourhood Plan includes a policy to identify the network of green infrastructure within the parish, which could feed into the wider project.

Conclusion

1. **Strategic Development** - The Shipley Parish Council is strongly opposed to the inclusion of Land at Buck Barn (Wealdcross) as a draft strategic allocation within the Draft Local Plan. These homes would be in an entirely inappropriate area of the District away from areas of housing need a growth.

The spatial strategy of the District should focus on the historical pattern of development and move towards the sustainable expansion of existing settlements to meet the District need and in areas of economic growth for the needs of any adjoining local authority.

The lack of evidence or information submitted as part of this proposal does little to help the Council assess the enormous impact that such a development would have on a predominantly rural area. If this were a serious proposal then the Council would need to consider a major coordinated change to public transport in the rural areas of the District.

However, it is hard to see that any scheme would be viable in this location. With only a single developer putting forward this land for development, the deliverability of the homes within the plan period is called into question, together with the viability of the entire development, which would be reliant upon securing a significant amount of infrastructure up front in order to make the development allocation even remotely acceptable due to the unsuitable location which is unrelated to any local settlement boundary.

With the significant infrastructure costs outlined above to be borne by a single developer, it is doubtful whether the development would actually result in the provision of the large number of homes suggested over the plan period.

The Land at Buck Barn (Wealdcross) clearly does not meet the proposed spatial strategy for the District or accord with guidance set out in Chapter 3 of the NPPF on sustainable development. It should be removed from any further consideration in the Local Plan process.

2. **Climate Change** – The Parish Council is disappointed that the draft Plan contains only modest and un-demanding obligations to climate change. It fails to take into consideration :-
 - the UK’s obligations related to the Paris Agreement;
 - the impact of the recent Heathrow Airport appeal on environmental grounds; and
 - that strategies relating to environment, climate change and flooding fall short of exemplars in the county e.g. the SDNPA environmental strategies and thresholds could provide a useful comparison for HDC to draw on.
3. **Transport Infrastructure** - Whilst welcoming the intentions within the draft Plan, they notably avoid mention of scheduled bus services, which remain the obvious best option for many types of journeys, particularly for residents of rural settlements to visit towns and hub villages for work, college, shopping and socialising. Community Transport schemes can play a part in this but regular scheduled bus services remain critical for linking the main hubs and connecting rural settlements. The current level of these services has been reduced in some areas of the District (e.g. Thakeham, Shipley, and Barns Green) to the point of effective non-existence. Whilst scheduled bus provision is a WSCC responsibility, it is vital that HDC robustly represents the interests of its rural communities in a way that has an impact on planning/funding of scheduled bus services. These areas cannot take more housing without decent public transport connections.