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# Council - Supplement

**Monday, 11th December, 2023 at 6.00 pm**  
**Park Suite, Parkside, Chart Way, Horsham**

To: All Members of the Council

You are summoned to the meeting to transact the following business

Jane Eaton  
Chief Executive

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**COUNCIL**  
**11 December 2023**  
**Questions from the Public**

1	<p>A multitude of groups representing the Billingshurst community (which includes the Parish Council, the Billingshurst Sports and Recreation Association, the hugely respected Billingshurst Community Partnership, Billingshurst Tennis Club and importantly, a range of environmental and other groups including BilliGreen, Sussex Green Living, Save Little Daux and Sussex Wildlife Trust) have all written to HDC to give their support or preference for development to the West over East. Together these groups represent thousands of Billingshurst residents.</p> <p>Given this very clear community support and the symmetry between the requirements of the Levelling Up and Regeneration Act 2023, which requires new development to be “shaped by local people’s democratic wishes” and the Lib Dem 2023 manifesto pledge to “care about communities and their residents” and the slogan, a “Lib-Dem victory means the Council will be listening to YOU”, could you please confirm that you as a committee will not be supporting the Reg. 19 Local Plan as currently drafted by officers which proposes to totally ignore this clear community support and instead allocate land West of Billingshurst rather than development to the East of Billingshurst?</p>
2	<p>This question is regarding HDC’s draft proposal to allocate the east of Billingshurst for development rather than the west. The developer proposing to develop the east site makes little effort to meet the criteria in strategic policies 8 &amp; 17 ‘Sustainable Design &amp; Construction’ and ‘Green Infrastructure and Diversity’. It will build to current building regulations only. It would remove a significant green space valued by residents and commits to only 10% Biodiversity Net Gain.</p> <p>In contrast, the developer proposing to develop the west site does much to fulfil policies 8 &amp; 17. It proposes:</p> <ul style="list-style-type: none"><li>• To build to the Future Homes Standard, above and beyond current building regulations</li><li>• Sustainable design using the principles of ‘20-minute neighbourhoods’</li><li>• Approximately 50% Biodiversity Net Gain by rewilding 90 acres of land to create a nature reserve, to be placed in public ownership improving access to nature for all Billingshurst residents.</li></ul> <p>In our current climate and nature crisis, can you justify this decision in the light of policies 8 and 17?</p>
3	<p>SP9 para 1 concerning Water Efficient Design provides in sub para a) that “new residential development is designed to utilise no more than 85 litres of mains supplied water per person per day.” As HDC and Natural England are aware, 85 litres is a purely aspirational and entirely theoretical consumption figure which flies in the face of readily available actual water use data for this district and nationwide which is very considerably higher than, and in many cases almost double the 85 litres figure. The company which HDC, Crawley and Chichester retained in 2022 to retrofit 100 council properties in Crawley with flow restrictor devices provided HDC with its own actual use data for all properties fitted with its flow restrictor devices from 2020 to 2022. This data shows that after installation of water flow restrictors there is an average consumption of 166.52 litres per person per day.</p>

	<p>Furthermore HDC has publicly stated (in the Woodfords application hearing) that contrary to the very clear requirement and direction from Natural England it will not monitor water use in new build properties and ensure enforcement of the 85 litres target.</p> <p>Why does this matter? It matters because the lower the target water use figure for new builds, the easier it becomes for developers to have their applications approved which will inevitably result in the building of houses across the district which will be very far from water neutral. This will increase the very real threat to our district's finite water supply until a permanent solution to sustainable water supply in our district has been devised, implemented and tested.</p> <p>So, our question is why is HDC bending over backwards to benefit the house builders and thereby wilfully and needlessly exposing our district to the real risk of exhaustion of its finite water supply.</p>
4	<p>Why has the lack transport infrastructure for the development of land West of Ifield been ignored against the advice from multiple transport studies by both Horsham and Crawley on the aspirational concept of a "15-minute community"? The published Horsham Transport Study Local Plan 2039 Transport Assessment - 2023 Update App 8. to support the Local Plan identifies Land West of Ifield as the largest development in the area with no mitigation for traffic uptake, where previous studies identify needs and mitigation.</p>
5	<p>Despite responding to your local consultation with over 120 letters of support, being included in your own Playing Pitch Strategy Actions and Recommendations as a club in need, receiving two letters of support from Sport England and England Hockey we appear to be unsupported by this proposed plan.</p> <p>I understand this Council has taken the decision not to include Horsham Golf &amp; Fitness Village within the draft Local Plan and therefore deny Horsham Hockey Club the opportunity to secure a fully funded new home at no cost to the Council or the club.</p> <p>Given this decision, please can the Council explain how it intends to deliver the sports and leisure facilities it has identified as being needed within the District (specifically, new facilities for Horsham Hockey Club) which were proposed to be delivered as part Horsham Golf &amp; Fitness Village and are not included in any other scheme, and why no Politician or Officer from the Council is actively engaging with my club to support us and our 320 members.</p>
6	<p>Given the new Local Plan is nothing but the previous draft with all its flaws, greenwashed with aspirational policies around climate change, sustainable design and biodiversity 'enhancement', meaning that the Council has failed to take a golden opportunity to significantly reduce housebuilding numbers, and failed to present a sustainable 30 year Vision, but instead continues to pursue a relentless growth agenda based on jobs at Gatwick (at odds with net zero), unsustainable population growth and environmental destruction, I would ask the Council: What is the evidence that residents have been properly consulted during the drafting of this Plan, their Neighbourhood Plans respected, and their concerns about over-development in the District (region) - primarily for the benefit of developers and mortgage lenders, not local communities - taken into account in the Plan?</p>

	<p>I would add, respectfully, that I will not be satisfied with a response that points out that the housing target is lower than suggested by the Standard Method. The difference is small, and the target is virtually unchanged from the HDPF and so will still lead Horsham to suffer some of the highest population growth in Sussex, Surrey and Kent.</p>
7	<p>Why has Horsham District Council indicated in the draft LP a preference for a development in Billingshurst with a Developer who refuses to build a relationship with our community and, in our opinion, has no intension of delivering anything other than the bare minimum they are required to under planning law? All our efforts to try to meet and discuss with them have been refused and rebuffed. This is in direct contradiction of the HDLP paragraphs 10.117 and 10.118.</p> <p>The draft LP also fails to recognise the legal requirements of the Localism Act 2011 and the Levelling Up and Regeneration Act 2023, both of which put people at the heart of development decision making, and are meant to give local people significantly more influence over the issues that make a difference to their lives. This includes development. Local development should be about more than just planning law.</p> <p>There have been no community infrastructure improvements in Billingshurst over the past 15 years. Why is the District Council ignoring the views of Billingshurst residents in favour of a development that is inferior in terms of its offer for new community infrastructure and facilities? Bellway have still not built the primary school and dentist that they were supposed to have as part of their last development project in Billingshurst (564 houses). It is outrageous that Bellway are allowed to transfer this promise to the draft LP. It is not enough for a developer to give empty promises and only state intension to provide community infrastructure as is the case in the draft LP.</p> <p>Billingshurst was once a rural village with poor services and facilities. It is fast becoming a deprived urban area. A community with 10k people (and rising) expects its District Council and Councillors to seek the best deal for the community. The Bellway planning proposal is not the best deal. There are better community infrastructure and facilities being offered by the Western Development.</p>
8	<p>Strategic Policy 12 - Air Quality</p> <p>Additionally, referring to Air Quality. Rightly, I believe this and the resulting health issues, are key areas of concern for local residents. The plan mentions traffic as being the biggest concern and then lists a number of other contributors but fails to mention the large incinerator that is due to be built. This will be a major contributor to air and ground pollution both from the plant itself and the increased HGV movements. Is there a reason that this has not been mentioned specifically?</p> <p>Is there a reason that the soon to be built incinerator is not mentioned in the list of other contributors to air pollution?</p>

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**COUNCIL**  
**11 December 2023**  
**Questions from Parish Councils**

<b>1</b>	<p><b>Storrington &amp; Sullington Parish Council</b></p> <p>Following the Regulation 18 consultation in 2020 there were 622 comments. The vast majority of these were objections, including from several Parish Councils and also from Andrew Griffith, M.P. The support, unsurprisingly, was mainly from developers.</p> <p>There was further consultation of PCs in September of this year. Speaking for Storrington &amp; Sullington, we objected very strongly to the sites proposed for inclusion in our parish and offered alternative sites more acceptable to the public. We believe that other PCs were equally dismayed.</p> <p>Given that the Government has stated that development plans should be “bottom up” can you please explain how you consider that this complies with that requirement and what changes were made to site allocations following these meetings? We were clearly told that our objections would be considered yet, certainly for Storrington &amp; Sullington, there have been no changes in allocations since the previous incarnations of this plan.</p> <p>We have a made Neighbourhood Plan which designates one green gap between Storrington and West Chiltington. The allocated sites lie immediately within that gap. The Neighbourhood Plan is the most recent evidence of what the public will support and has been completely disregarded by HDC. How is this “Bottom up” planning?</p>
<b>2</b>	<p><b>Itchingfield Parish Council</b></p> <p>My question relates to page 173 of the draft Plan.</p> <p>The preamble to the section of the Plan dealing with set allocation reads (at para 10.133) The Parish has made good progress with the preparation of its neighbourhood plan. Following a successful examination, at the time of writing the plan has been unable to proceed to referendum in light of the Position Statement on water neutrality. The plan is expected to enter the final stages of plan making, and applicants should therefore be mindful of the content of the Neighbourhood Plan in this parish.</p> <p>With this in mind, why does the District Plan allocate for development three sites, two of which were rejected by the parish after careful analysis and which are therefore considered by the parish to be unsuitable for development?”</p> <p>In this context it should be noted that HDC has, until now, fully supported the content of our draft plan, including the allocation of development sites.</p>
<b>3</b>	<p><b>Southwater Parish Council</b></p> <p>The Local Plan designates Southwater as a village/small town suitable for development and a Strategic Site. The plan states that development up to 2040 will be an extra 285 homes (plus 450 homes in the Southwater Neighbourhood Plan), 735 homes plus the build out of the existing Berkeley site (of Broadacres) circa 300 in total over the plan period to 1,035 homes and another 265 for the period beyond 2040 at a build out rate of 50 per year will take the development period to 2045. Also noting the impact of the peripheral sites of Rascals Farm and Woodfords of just under 200 additional units right on the boundary of Southwater. The Local</p>

	Plan will effectively turn Southwater into a building site for the next 22 years. Is this fair to the residents of Southwater and is it sustainable?
4	<p><b>Thakeham Parish Council</b></p> <p>For a small village with virtually no facilities, infrastructure, and poor highways/transport options, surely there needs to be a clear steer from Planners on which option they favour; a) several less larger plots OR b) one large one (which is not currently in the plan but will undoubtedly be put forward by the developer Bellway Homes).</p> <p>We are not against reasonable housing development but it needs to be proportionate and clearly set out in the Plan. Currently, the Parish council would like to know how Horsham District Council considered the appropriateness of setting a housing allocation of 65 dwellings across various plots in Thakeham Parish which, if development proceeded on at least two of them - would exceed the housing numbers by more than a 10% variance as listed in the plan? Accumulatively, this would represent a very significant number of dwellings (65 plus 55 off Rock Road) when the possibility of hundreds of houses on the former mushroom farm is currently out for consultation but not included in the draft plan. Therefore, in asking this question - we seek an answer that would explain how these significant developments would impact on the capabilities accounted for in the proposed plan as there seems to be no contingency in place other than the Objection to large scale developments due to the strains put upon infrastructure as the delivery of infrastructure across Thakeham, our neighbours in the outlying Parishes and the district as a whole is predicated 65 +10% and not 620 (at our last count of potential dwellings).</p>