

Public Document Pack

Council 11 DECEMBER 2023

Present: Councillors: David Skipp (Chairman), Nigel Emery (Vice-Chairman), Sam Bateman, Emma Beard, Tony Bevis, Martin Boffey, Colette Blackburn, Peter van der Borgh, James Brookes, Jon Campbell, Philip Circus, Paul Clarke, Mike Croker, Joy Dennis, Len Ellis-Brown, Victoria Finnegan, Claudia Fisher, Ruth Fletcher, Chris Franke, Anthony Frankland, Nick Grant, Joan Grech, Kasia Greenwood, Warwick Hellawell, Alex Jeffery, Liz Kitchen, Joanne Knowles, Lynn Lambert, Richard Landeryou, Dennis Livingstone, Alan Manton, Nicholas Marks, Jay Mercer, John Milne, Colin Minto, Roger Noel, Jon Olson, Josh Potts, Sam Raby, John Trollope, Clive Trott, Belinda Walters and Mike Wood

Apologies: Councillors: Mark Baynham, Tony Hogben, Jonathan Taylor and Tricia Youtan

CO/60 **CHAIRMAN'S ANNOUNCEMENT**

The Chairman advised Members of the sad news that Councillor Malcolm Eastwood, serving Member for Henfield had passed away. He reported that the Council's sincere condolences had been sent to his wife and family. Members stood and observed a minute's silence in his memory.

CO/61 **DECLARATIONS OF MEMBERS' INTERESTS**

Councillor David Skipp declared a personal interest in Agenda Item 4 (Horsham District Local Plan 2023 - 2040: Regulation 19 Consultation) as a member of Ifield Golf Club. This did not affect their taking part in the discussion or vote.

Councillor Claudia Fisher declared a non-registerable interest in Agenda Item 4 (Horsham District Local Plan 2023 - 2040: Regulation 19 Consultation) as she had met the proprietor of land in Storrington that was allocated in the draft Local Plan. This did not affect their taking part in the discussion or vote.

CO/62 **QUESTIONS FROM THE PUBLIC**

Mr Trevor Leonard asked the following question:

'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.

Whilst developers to the East have consistently rejected attempts from the community to engage with them, the developers to the West have not only fully engaged but have entered into a legal binding agreement to ensure that commitments made to provide much needed community infrastructure are delivered at an early stage of any development.

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?’

Councillor John Milne, Cabinet Member for Planning & Infrastructure replied:

‘Thank you for your question. For clarity, a Local Plan is a matter for the whole council to decide, not just myself or the Cabinet. All the sites in the Plan face at least some level of local opposition. But at the same time, we’re obliged to choose at least some of them. So, from the start, it’s clear that not every public wish can be granted.

However, in practical terms the consultation has been very helpful. Officers have made numerous changes to the plan to reflect the concerns of communities across the District, within the constraints of national planning law. Many of these changes are detailed in appendix 2 of the Cabinet/Council report.

With any site, the primary consideration by far is that it meets planning law and stands a strong chance of approval by a national planning inspector at Examination. In the case of Billingshurst, while I note the claims that there is more support for the proposal to the West, we have received no clear evidence one way or the other. In the Regulation 18 consultation we received 11 supportive comments for the allocation of West of Billingshurst and 243 objections. The East of Billingshurst received 33 comments of support and 279 objections.

That’s the only formal evidence we have available, and it shows public opinion divided roughly 50/50. It was also apparent when myself and officers met with the Parish Council recently to discuss the Plan, that there were supporters and opponents of both options.

I would add that a majority of residents and the parish council would prefer no development at all. The West site allocation is for half as many houses again as

the East, a very considerable extra difference. As we've successfully reduced our overall district target, this is many more houses than we actually need.

In the long term, allocating the West would open up the west side of the A29 to such an extent that further large-scale development would be very, very hard to resist on planning grounds. There's just no obvious limit to the growth of Billingshurst once you break that barrier. I question whether that's what residents really want.

I hope to arrange a meeting with the Parish Council in the new year to discuss additional civic investment in Billingshurst, using funds outside the Local Plan process.'

Ms Melanie Holliker asked the following question:

'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 & 17 'Sustainable Design & 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.

In contrast, the developer proposing to develop the west site does much to fulfil policies 8 & 17. It proposes:

- To build to the Future Homes Standard, above and beyond current building regulations*
- Sustainable design using the principles of '20-minute neighbourhoods'*
- 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.*

In our current climate and nature crisis, can you justify this decision in the light of policies 8 and 17?'

Councillor John Milne, Cabinet Member for Planning & Infrastructure replied:

'Thank you for your question. Any development must be compliant with our new Local Plan policies. That includes Strategic Policy 8 'Sustainable Design and Construction' and Strategic Policy 17 'Green Infrastructure and Biodiversity' which sets a requirement for 12% biodiversity net gain (BNG). Land East of Billingshurst therefore must meet all policy requirements, and that includes the points you itemise.

Whilst I understand that new developments can cause adverse environmental impacts, there is a fundamental issue at stake. People need houses. All the large locations proposed to us are on greenfield sites. There's no way an area

like Horsham can avoid greenfield development under current government rules.

I also stress that the Local Plan hugely increases our ability to insist on carbon neutral building standards, as well as new protections for the wider environment.

Without an up-to-date local plan and a 5-year land supply, speculative developments will continue to come forward. Key policies such as the restriction on building outside the Built-Up Area Boundary would carry little weight. For example, HDC was obliged to accept an application for 83 homes at Duckmoor near Billingshurst, even though it was against district policy. And that's far from the only example.

Land East of Billingshurst is a logical extension to the village, with defensible boundaries to inhibit further development. Much needed affordable homes can be delivered, in a timely manner, alongside a number of community facilities such as a new primary school, informal recreation space, and a community hub. Its proximity to village facilities and services, including the railway station and secondary school, in conjunction with the proposed pedestrian and cycle routes, all combine to make the ambition of a '20-minute neighbourhood' genuinely achievable here. This site is therefore well-placed to meet Strategic Policies 8 and 17 if not exceed them.'

Mr Andrew Bardot asked the following question:

'SP9 para 1 concerning Water Efficient Design provides in sub paragraph 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.

Furthermore, HDC has publicly stated (in the Woodfords application) that contrary to the very clear requirement and direction from Natural England it will not monitor water use in new build properties nor ensure enforcement of the 85 litres target.

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.

So, our question is why is HDC bending over backwards to benefit the house builders by endorsing and adopting this absurd 85 litres per day figure, needlessly exposing our District to the real risk of exhaustion of its finite water supply when it should be requiring and enforcing a realistic daily water use target for new build development and challenging government housing targets?’

Councillor John Milne, Cabinet Member for Planning & Infrastructure replied:

‘Thank you for your question. There are two aspects to water neutrality. First, we have to ensure new development is as water efficient as possible. Second, any additional water use must be offset against existing supply.

Our Policy will require that new developments are built to much higher water efficiency standards than applied in the past. In joint consultancy with Crawley and Chichester, the other affected areas, a new average usage figure of 85l per person, per day has been agreed.

I stress, the 85 litres standard for new builds is separate from our offsetting strategy for existing properties. We’re not attempting to get all homes working to an 85-litre average and it wouldn’t be possible anyway.

Older properties are inherently less water efficient. It’s correct to say that in the Crawley pilot, water use after retrofitting remains high at 166.52 litres per person per day. However, before the installation of flow restrictors, these properties used an even higher average of 199.85 litres per person per day. Therefore, retrofitting has cut that by 30 litres which can be used to offset new development elsewhere.

The trial has been a positive experience for residents. They continue to use appliances as normal, while benefiting from a significant cut in both their water and heating bills. Although that wasn’t the reason for doing it, it has turned out to be a useful contribution to the cost-of-living crisis. It might even catch on with private households in the long term.

This joint strategy was agreed with Crawley and Chichester and endorsed by Natural England last year. It’s important for the council to honour its commitments. Crawley’s Local Plan is currently at Examination stage and no relevant issues have been raised by the Inspector.

Over time, the Water Neutrality check on development is reducing. Applicants are increasingly able to demonstrate their own water neutrality schemes. There’s no doubt this is going to happen more often, and with much larger sites.

For this reason, we recognise we’re in something of a race against time, to get the plan passed and regain control of district planning. Further delay, with no clear objective in mind, risks having much higher housing targets imposed on us. Potentially 2 or 3 times higher in the first years.’

Mr David Brown asked the following question:

“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.”

On behalf of Councillor John Milne, Cabinet Member for Planning & Infrastructure, Councillor Ruth Fletcher, Cabinet Member for Local Economy & Place replied:

‘Thank you for your question. As part of the preparation of the Horsham District Plan, Horsham District Council has undertaken extensive transport modelling to ascertain the impacts of the plan. This is a mandatory requirement. We have used the WSCC approved methodology It would be difficult to diverge significantly from their assessment.

This document is available to view on the Local Plan evidence base pages. It identifies mitigation measures designed to accommodate levels of increased traffic in the area. These include the measures set out in Policy HA1, and the reference in paragraph 10.98 that require any impacts on Rusper to be taken into account.

In addition, there is an extension of high-quality Fastway bus services to serve the development. An active travel design concept will offer direct, attractive walking and cycling links to Ifield Station and village, and into Crawley Town centre.

If the plan is agreed this evening, further work on the detailed transport impacts arising from this scheme would still be necessary to support any eventual planning application. Officers will continue to seek the necessary detail from Homes England and will challenge this data if they consider that impacts on Rusper or indeed the road network more generally have not been adequately addressed.’

Mr Chris Poland asked the following question:

‘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.

I understand this Council has taken the decision not to include Horsham Golf & 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.

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 & 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.'

On behalf of Councillor John Milne, Cabinet Member for Planning & Infrastructure, Councillor Jon Olson, Cabinet Member for Leisure, Culture & Green Spaces replied:

'Thank you for your question. The provision of facilities for Horsham Hockey Club is one of the council's priorities with regard to leisure facilities. Officers across both Leisure and Planning departments have actively engaged with the Hockey Club during the plan preparation process. We have established your requirements, which are summarised as "two sand-dressed, floodlit artificial playing pitches, ideally as part of a sports hub with a clubhouse and associated ancillary facilities".'

There has also been correspondence between the Hockey Club and planning officers during the Course of plan preparation. Land at Horsham Golf and Fitness has not been proposed as an allocation in the Local Plan. The results of this assessment are set out in Appendix 7a of the Cabinet report. Investment in sports facilities is always welcome, but that can't be the sole criteria. As a whole this proposal fails to meet the tests of sustainable development as set out in national policy and is therefore not recommended for allocation.

As you will be aware, separate to the Local Plan process a planning application has been submitted, for development at Horsham Golf & Fitness including Hockey pitches. This application is yet to be determined and I am therefore unable to comment further now. Officers have endeavoured to secure appropriate facilities within the allocated strategic sites and will continue to seek to actively engage in this respect.'

Ms Fenella Maitland-Smith asked the following question:

'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 as a whole taken into account in the Plan? My concern is that the plan is confused and not fit for purpose. Pretending to be is one thing, but at its heart it is something quite different. It does have strengthened environmental policies and this is welcome, but it does not present a vision for a sustainable future. In fact, I have struggled to find a statement of a 30-year vision at all and that is because at its heart it is still the same old plan for overdevelopment.

This plan perpetuates the existing rate of house building, pulling more and more people into the area, driving population growth at current rates which will cause house building targets to be even higher in the future. We now have the highest

rate of population growth of any Local Authority in Sussex or Surrey and double the national average.

The Council and the plan need to acknowledge this, and call it to a halt, but instead the plan is full of aspirational policies and long lists of requirements on developers which are unlikely to be satisfied and I include the water neutrality strategy in this. There's so much uncertainty around at the moment and such a lack of detail in the plan that I fear we're heading for a mess: insufficient infrastructure, insufficient social housing and no end to developers and finance profiting at our expense and nowhere is this more the case than in the West of Ifield site.

Finally, Cabinet Members have made no secret of the fact that they're pushing the plan through in case water neutrality requirements are pulled, and to stop speculative applications, but changes to the NPPF will be published in the next few weeks which could reduce risks like this and potentially offer further opportunities to reduce housing targets and have a properly sustainable plan for the future. Please do not vote for anything less.'

On behalf of Councillor John Milne, Cabinet Member for Planning & Infrastructure, Councillor Martin Boffey, Leader of the Council replied:

'Thank you. I shall answer the question, as submitted. I disagree with your list of 'givens' but to the question itself: in fact, the Council has extensively consulted residents during the Plan process. Two rounds of consultation were carried out under Regulation 18, in May 2018 and February 2020. In the second of these, the Council held public exhibitions, distributed 5,000 leaflets across the District, and extensively publicised the consultation via email and social media. Over the last few years, bespoke consultation workshops focussing on potential development sites were undertaken with parish and neighbourhood councils, including in September 2021 and very recently in September 2023. Three open public events were additionally held in May 2022, in Horsham, Pulborough and Ashington.

For the local plan to be found sound, we are legally obliged to meet the requirements of the NPPF, the National Planning Policy Framework. That includes sufficient provision to meet our housing target. Failure to do so means planning by appeal and would completely undermine our ability to enforce higher standards in respect of both the environment and net zero construction. I further note that parishes benefit from access to a Senior Neighbourhood Planning officer at the Council. Along with the Strategic Planning team, he has worked directly with parishes to align the Local Plan as closely as possible with both made and emerging Neighbourhood Plans across the District.

Finally, even where sites are recommended for inclusion against public wishes, this doesn't mean consultation makes no difference. There have been numerous improvements to the plan reflecting community concerns. But often the local preference is for no development at all, and this is impossible to follow. You can find many of these changes in appendix 2 of the Cabinet/Council report."

CO/63 **QUESTIONS FROM PARISH AND NEIGHBOURHOOD COUNCILS**

The representative for Storrington & Sullington Parish Council asked the following question:

'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. There was further consultation of PCs in September of this year. Speaking for Storrington & 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.

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 & Sullington, there have been no changes in allocations since the previous incarnations of this plan.

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?'

Councillor John Milne clarified that there were over 6000 representations, as opposed to 622 quoted. On behalf of Councillor John Milne, Cabinet Member for Planning & Infrastructure, Councillor Sam Raby, Cabinet Member for Housing, Communities & Wellbeing replied:

'Thank you for your question.

As you will be aware, Horsham District Council must prepare plans which are in accordance with the NPPF. Plans must be consistent with national policy and be based on proportionate evidence. They must also cover a 15-year period starting from the date plans are adopted.

Existing Neighbourhood Plans across the district cover the period to 2031. The new local plan, if agreed, will cover the period to 2040. This means the Council must allocate a significant number of additional sites, or we would end up with a 9-year hole in the numbers with zero allocation. This an innate flaw of the planning process, as Local Plans and Neighbourhood Plans have different obligations to be fulfilled over widely different timescales.

All allocations must meet NPPF requirements. As you note, we have worked with Parish Councils to consider whether the suggested alternatives meet the

criteria for allocation. Where these have not been included, it's because officers concluded they could not demonstrate the minimum NPPF criteria of being suitable, available and achievable.

I realise this plan contains sites which will contradict local preferences, and in practice it's hard to see why this wouldn't happen with every local plan. But we still incorporate your views where we can.

For example, draft policy ST01 specifically requires an application must be supported by a Landscape and Visual Impact Assessment. In the case of Land North of Melton Drive, our strategy is to permit development but only in the southern half of the site, while landscaping the rest. We believe this to be the most effective way to create a long-term defensible landscape boundary. It's hoped this will protect the parish against the concerning precedent set by an unwanted approval at appeal of a neighbouring site, which might otherwise encourage further expansion towards West Chiltington.'

The representative for Itchingfield Parish Council asked the following question:

'My question relates to page 173 of the draft Plan. 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.

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? 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.'

On behalf of Councillor John Milne, Cabinet Member for Planning & Infrastructure, Councillor Sam Raby, Cabinet Member for Housing, Communities & Wellbeing replied:

'For clarity, as the page numbers you refer to won't match the page number on all printed copies, this question relates to Strategic Policy HA6: Barns Green.

Existing Neighbourhood Plans cover the period to 2031. The new local plan, if agreed, will cover the period to 2040. This is to ensure it's in accordance with the NPPF requirement that a plan must run for 15 years from adoption. Therefore, the Council must allocate a significant number of other sites beyond what's in neighbourhood plans, in order to ensure delivery over the entire period, not just till 2031.

In doing this, we have taken account of feedback provided to us through both formal consultation and Parish workshops, the most recent of which were held

in September this year. We've specifically referred to the progress of your neighbourhood plan to take account of this feedback.'

The representative for Southwater Parish Council asked the following question:

'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 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?'

The representative then asked why the Southwater Neighbourhood Plan review must be delayed, to await the revised National Planning Policy Framework (NPPF), whilst the District Local Plan would go ahead. It was confirmed that the review would need to be in accordance with the NPPF, as well as the District Local Plan.

On behalf of Councillor John Milne, Cabinet Member for Planning & Infrastructure, Councillor Sam Raby, Cabinet Member for Housing, Communities & Wellbeing replied:

'Thank you for your question. I am only going to be able to respond to the question as submitted because I am [acting as spokesperson] and so I am not going to be able to add the supplementary information, but I will read out the [response] that has been prepared to your question. Southwater is designated in Policy 2 of the Horsham District Planning Framework (HDPF) (November 2015) as a "small town and larger village". Such locations are classed as "settlements with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and/or bus services.

After Horsham, Southwater along with Billingshurst, Broadbridge Heath, Henfield, Pulborough, Steyning and Storrington, was classed as one of the next most sustainable locations in the 2015 Local Plan and this remains the same today.

Like local authorities across the country, we have a mandatory housing target requiring us to build 1,000s of houses over a very long period. I don't see how this can be done without implying continuous construction wherever it is. But only a part of the site will be operational at any one time. Some of the houses we approve today won't even start for 20 years.

Compared to earlier drafts of the plan, we've managed to cut the number to 1,000 from 1200 as it was in all previous versions, or indeed the 1500 that was

applied for in October 2022. 450 of this 1,000 are already agreed anyway in the Neighbourhood Plan.

The development will be expected to provide new infrastructure including a new secondary school, which will serve the needs of both the new and existing community. The policy requirements HA3 sets out a wide range of requirements to ensure that the development which takes place is sustainable.'

The representative for Thakeham Parish Council asked the following question:

'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).

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).'

On behalf of Councillor John Milne, Cabinet Member for Planning & Infrastructure, Councillor Sam Raby, Cabinet Member for Housing, Communities & Wellbeing replied:

'Thank you for the questions. With regard to the large site you mention, until it's actually promoted for inclusion in the Local Plan process, we can't comment. Clearly, sites not formally presented can't qualify as either available or deliverable.

We have tested various options for growth in our Sustainability Appraisal process. This analyses the ability of the District to accommodate different levels of growth, and where it might be located. This process was mostly carried out under previous HDC administrations and indeed the readying of sites for potential approval is a matter of many years, not months. It was decided that growth should be concentrated around Horsham, urban extensions and some growth of villages and towns in accordance with the level of services and facilities to be the most sustainable option.

A full appraisal of all options was then undertaken, and the results compared to ensure that only the most sustainable mix of sites was taken forward to allocation. It is those sites which have been included in the Regulation 19 document.

The Council has sought to allocate two sites on High Bar Lane which together could deliver 65 homes. Our evidence indicates that, as a settlement, Thakeham (as in The Street and High Bar Lane), is able to accommodate such growth. There were a number of other sites in the Parish which have not been recommended for allocation.

In addition, we recognise too that the site on Rock Road, a proposed allocation for 55 homes is within Thakeham Parish. This is referenced in the draft Regulation 19 document as well as in evidence documents, such as the Site Assessment Report. However, as the site immediately abuts the settlement of Storrington, if developed it would form part of the Storrington Built Up Area. In assessing the site, the Site Assessment Report recognises that any future resident would likely rely upon services in Storrington. Accordingly, we have identified the site in the Storrington section of the Regulation 19 Local Plan.'

CO/64 **HORSHAM DISTRICT LOCAL PLAN 2023 - 2040: REGULATION 19 CONSULTATION**

Councillor John Milne, Cabinet Member for Planning & Infrastructure introduced the report, and thanked Officers for their work in preparing the submission. The Local Plan was a priority for the new administration, and a revised version of the previous draft Local Plan had been produced. The revised plan included the following key changes:

- The annual housebuilding target over the next 5 years had been cut. The constraints of water neutrality allowed a reduction from 1200, to 480, per annum. The need for new homes was acknowledged, as well as the challenges of absorbing a large number of new homes built each year.
- The eco building standards had been upgraded, with the aim to increase the standards further, thus aiding the move to net zero carbon emissions
- Environmental protections would be formalised and given legal enforceability
- A vital contribution to fixing the national housing shortage, with the provision of up to 45% affordable housing, and homes for social rent being prioritised. Community Land Trusts would also be supported.

It was noted that although brownfield was favoured, the sites available for inclusion in the Local Plan were all greenfield sites. To meet the housing target, West of Ifield, Southwater and East of Billingshurst sites were included, however it was possible to exclude other sites, that had previously been

included. The sites had been assessed as most appropriate due to transport infrastructure, as well as the future provision of schools. The Cabinet Member outlined the reduction in housing numbers allocated at the West of Ifield site, as well as for Southwater and Billingshurst.

Councillor Martin Boffey, Leader of the Council, seconded the motion.

Members discussed the figure of 85 litres of water usage, per person, per day. It was suggested that the 110 litres figure was more pragmatic, as provided in the Building Regulations. It was felt this would promote a healthy standard of living. A figure that was too stringent could result in residents not being able to meet their daily needs. Further to this, it was proposed that alongside the limits, there was a need for behaviour change. It was suggested that the target for the number of homes had been reduced as a result of water neutrality, and that the higher number previously included had been calculated prior to water neutrality.

The Head of Strategic Planning clarified that there was a need to maximise the delivery of housing in accordance with NPPF requirements, and that 110 litres would deliver significantly fewer homes. The available evidence indicates that 85 litres is achievable.

It was stated that some communities did not feel that their views had been taken into account, and that further consultation and review should take place. Some Members felt that the decision to be taken at the present meeting had been rushed. There was also discussion in support of the consultation that had taken place, with particular reference to the workshops.

It was further suggested that more detail was required in relation to the Gypsy and Traveller sites. Members suggested that the strategy offered progress to meeting Gypsy and Traveller housing needs but did not resolve concerns. The challenges for the residents of Pulborough, in relation to the site at Girder Bridge, due to closeness of the railway line. It was suggested that the noise and flooding could be breach of their human rights.

Concerns around infrastructure across the District were raised, as the provision of many aspects were not within the control of the Council. The need for new roads, doctors' surgeries, schools, and other important infrastructure was highlighted.

The risk of speculative development and not having a 5-year housing supply, through not having a Local Plan was highlighted. The adoption of the Local Plan would provide certainty, which was felt to be important. Without a Local Plan, developments could be approved by the Planning Inspector, which did not allow for strategic decisions to be made in relation to development within the District. This point was made with particular reference to development at Lower Broadbridge Heath Farm.

It was noted that sites could only be selected from those put forward to the Council from Regulation 18 onwards, and it would cost significant time and money to revisit this. Due to the aforementioned risks, it was highlighted that it

was crucial for the Council to have a Local Plan. The delay to the adoption of a revised Local Plan, alongside the constraints of water neutrality, had led to difficulties within the construction industry, which was important for the local economy.

The importance of sustainability and active modes of travel were highlighted, with further reference to biodiversity net gain. The transport strategy aimed to deliver safe and accessible routes to encourage active travel. The requirement for homes to be sustainably built would ensure progression toward becoming carbon net zero, whilst also offering a reduction to residents' energy bills. The potential for a future Supplementary Planning Document was discussed, which would ensure the improvement of the quality of buildings, which could include the use of rainwater, as well as provision of community spaces.

Other elements of the plan were acknowledged, including the continued protection of locally designated green spaces, leisure facilities and developing inclusive communities. Members stated that the approval of the Local Plan would enable the protection of biodiversity, and the ability to ensure the provision of a wider range of housing. It was noted however, that there was no reference to the Arun River, and this was felt to be an omission, as many major developments would feed into the Arun River.

Members made the following comments in relation to specific sites contained within the plan:

- Sandgate Nursery – this site had not been included in the Neighbourhood Plan and was considered by public poll that it was not a desirable site.
- Hornbrook Farm – The amendments were welcomed, as safe routes to walk, and an extension to the riverside walk were to be offered.
- Southwater North – The revised plan from developers was welcomed, as it included fewer homes, as well as allowing for the provision of a school, infrastructure, green spaces and affordable homes. It was felt that the proposed Local Plan would provide the opportunity for this Council and the Parish Council to work with the developer to preserve village community spirit, whilst delivering much needed infrastructure. It was anticipated that the lower housing targets would enable the incorporation of the required infrastructure. If the Local Plan was to be approved, residents were encouraged to engage with the Council through the consultation period to identify and secure further improvements.
- Land north of Melton Drive – It was noted that the inclusion could create issues, as the site had been included against the wishes of the relevant parish councils, with reference made to previous planning applications and the response of the planning inspector. Further comments were made in relation to the transport provision within this area, and the safety of walking routes, as well as road safety and speed limits. There were also concerns raised in relation to the impact on listed buildings.

It was noted that changes had been made to the draft Local Plan that had not been highlighted. As such, Councillor Claudia Fisher proposed an amendment

to the motion to approve the recommendations. It was proposed that the consideration of the item be delayed by 1 month. This would allow further time for scrutiny, review and feedback.

Councillor Nicholas Marks seconded the motion. Members debated the motion. Some Members felt that additional time would allow further reflection, particular in light of the imminent publication of the revised National Planning Policy Framework (NPPF).

A question was raised as to the advice that Parish Councils await the revised NPPF, before conducting a review of their Neighbourhood Plan, whilst the recommendation was for the draft Local Plan for the District to be approved. Officers clarified that the plan preparation process for local and neighbourhood plans differed. The Local Plan for the District would set the framework for Neighbourhood Plans going forward, and the changes that were understood to be due in the NPPF had been considered as part of the Local Plan preparation process.

The Leader and Cabinet Member spoke in support of continuing with the debate and vote at the present meeting. It was highlighted that the plan had been shared at an earlier stage with all Members. Workshops had been undertaken and Members were afforded the opportunity to discuss the plan with Officers and Cabinet Members. It was further noted that a month delay would not afford time to make considerable amendments. Should detailed amendments be requested, a number of months would be required to formulate the evidence base required.

It was moved by Councillor Tony Bevis and seconded by Councillor Belinda Walters that the vote be recorded, in accordance with Rule 4a.19 (d) of the Council's Constitution.

FOR THE AMENDMENT: Philip Circus, Claudia Fisher, Alan Manton, Nicholas Marks, Roger Noel, Josh Potts

AGAINST THE AMENDMENT: Sam Bateman, Tony Bevis, Martin Boffey, Colette Blackburn, Peter van der Borgh, James Brookes, Jon Campbell, Mike Croker, Len Ellis-Brown, Nigel Emery, Ruth Fletcher, Chris Franke, Anthony Frankland, Nick Grant, Kasia Greenwood, Warwick Hellowell, Alex Jeffery, Liz Kitchen, Joanne Knowles, Lynn Lambert, Dennis Livingstone, Jay Mercer, John Milne, Colin Minto, Jon Olson, Sam Raby, David Skipp, John Trollope, Clive Trott, Belinda Walters, Mike Wood

ABSTAINED: Emma Beard, Paul Clarke, Joy Dennis, Victoria Finnegan, Joan Grech, Richard Landeryou

ABSENT: Mark Baynham, Tony Hogben, Jonathan Taylor, Tricia Youtan

The Motion was therefore declared **LOST**.

Further discussion took place in relation to development at the following sites:

- West of Ifield – The impact of Gatwick on the area was highlighted. The concerns in relation to this site included traffic pressures, infrastructure in relation to the roads, recreation facilities, urban sprawl (particularly in relation to the villages of Colgate and Rusper), and the loss of a historic landscape. The loss of the golf club was also felt to be detrimental to the community.
- Development in the Holbrook wards - It was acknowledged that the increased population would bring challenges to those that live within the ward. As such, the plans for a new train station, and the provision of additional schools, were welcomed.
- Billingshurst - The support for the site in the West was acknowledged, with particular reference to the football club, biodiversity gains, and the nature reserve. However, it was felt that the site in the East was more suitable, as it would result in fewer additional homes in the village. Further to this, it was preferable in relation to the distance from the train station, and it was contained within strong existing boundaries that would restrict the opportunity for future development. The site in the West would risk creating 2 villages, with a loss of cohesion. It was noted that the village had grown considerably in 20 years, however infrastructure had not kept pace. The need for an integrated care board, and early start on construction of new schools was highlighted.

The importance of the provision of additional infrastructure was highlighted. The proposed Local Plan included additional schools, which Members felt were needed. The current distance many children travel to school had an impact on them and their families, including financially. It was noted however, that there were spare school places at the end of each year, and that proposals for new schools had previously been halted due to falling birth rates. Further to this, there was a school that was undertaking a consultation to reduce their intake, which did not support the need for additional schools. There would need to be a sufficient case to ensure an academy would take on the running of any future schools. The Head of Strategic Planning advised that an Infrastructure Delivery Plan had been produced, taking account of advice from West Sussex County Council on the need for new school provision, including the costs. West Sussex County Council had indicated that, due to demographic changes, it was anticipated that there would be a need for increased school places.

It was suggested that the policies contained in the draft Plan would put increased costs on developers, and as such developments may no longer be profitable. The Head of Strategic Planning advised that a viability assessment of the entirety of the Local Plan had been undertaken.

The need for housing provision was also flagged, in light of the number of residents on the housing list. There were also many residents living in overcrowded or insecure accommodation. It was suggested that there was a balance to be struck between preserving what makes the District a great place to live, and the need to make homes for people. It was felt that the Local Plan

was key to creating stability to create communities for people to live in. The increased providence to Community Land Trusts was also supported.

It was highlighted that 'energy from waste' can no longer be considered as a low carbon source of energy due to the planned reduction in the biogenic content of residual waste as a result of separate food waste collection. The Member confirmed that he was grateful to have been advised that the deletion of this phrase would be included in the list of proposed modification schedule to accompany the Regulation 19 Plan submission.

The Leader, as seconder for the motion, spoke in support of the draft Local Plan. The environmental standards, and building standards were highlighted. It was acknowledged that the housing supply targets were low, however this was considered appropriate at this time, given the impact that the speed of development has had on communities. The Leader advised that the outcome of consultations had been taken into account, and the views have tried to have been accommodated. The approval of the draft Local Plan would enable the Council, and communities, to keep control of development within the District.

The Cabinet Member for Planning & Infrastructure advised Members that throughout the development of the Local Plan, numerous concerns had been received from residents. The choices made were complex, however he advised they had been taken with strong reasoning. The Cabinet Member outlined the reduced housing target, which would lower build-out rates. On account of the lower build-out rates, the infrastructure to support new homes could be developed and new communities would be formed.

It was moved by Councillor Colin Minto and seconded by Councillor Clive Trott that the vote be recorded, in accordance with Rule 4a.19 (d) of the Council's Constitution.

FOR THE MOTION: Sam Bateman, Tony Bevis, Martin Boffey, Colette Blackburn, Peter van der Borgh, James Brookes, Jon Campbell, Mike Croker, Len Ellis-Brown, Nigel Emery, Victoria Finnegan, Ruth Fletcher, Chris Franke, Anthony Frankland, Nick Grant, Joan Grech, Kasia Greenwood, Warwick Hellawell, Alex Jeffery, Joanne Knowles, Dennis Livingstone, Nicholas Marks, Jay Mercer, John Milne, Colin Minto, Jon Olson, Sam Raby, David Skipp, John Trollope, Clive Trott, Belinda Walters, Mike Wood

AGAINST THE MOTION: Philip Circus, Paul Clarke, Joy Dennis, Liz Kitchen, Richard Landeryou, Alan Manton, Roger Noel, Josh Potts

ABSTAINED: Emma Beard, Claudia Fisher, Lynn Lambert

ABSENT: Mark Baynham, Tony Hogben, Jonathan Taylor, Tricia Youtan

The Motion was therefore declared CARRIED and it was RESOLVED that:

- i) The publication of the Horsham District Local Plan Regulation 19 document together with the Sustainability Appraisal, Habitats

- Regulation Assessment and Policies Map and other supporting evidence base documents be approved for a 6 week period of representation from Friday 19 January 2024 to Friday 1 March 2024.
- ii) The submission of the Horsham District Local Plan Regulation 19 document to the Secretary of State for Levelling Up, Housing and Communities (the Planning Inspectorate) for examination be approved, following the six week representation period, together with Regulation 19 representations submitted to the Council and the necessary background evidence.
 - iii) Authority be delegated to the Director of Place in consultation with the Cabinet Member for Planning and Infrastructure to prepare a Proposed Modifications Schedule for the Plan with proposed changes that may be required to address soundness representations received during the aforementioned representation period.
 - iv) It be noted that the final Local Plan will be brought back to full Council for formal adoption following the independent examination undertaken by the secretary of state.

REASONS

- i) The recommendations are required to ensure that the Council meets the statutory requirement to carry out a Local Plan review, and to meet the requirements in the Town and County Planning (Local Planning) England Regulations 2012.
- ii) It is both legally necessary and appropriate to invite public and stakeholder participation in the preparation of a new Local Plan for Horsham District. Part of the statutory process is to allow representations to be made on the Local Plan before it is submitted to the Secretary of State.
- iii) To enable the Local Plan to progress to independent examination and accord with government requirements to have an up-to-date Local Plan.

The meeting closed at 10.24 pm having commenced at 6.00 pm

CHAIRMAN

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