

Cabinet
11 December 2023
Written Responses Questions from the Public

1	<p>Under the Regulation 18 Consultation, Sport England (SE) objected to part of Policy 46 Community Facilities stating that it was non-compliant with National Policy in that it would reduce the protection for Sport, Leisure & Recreation facilities. They even suggested a wording modification to remedy the problem. Despite this important response from a statutory consultee, the 2021 draft local plan failed to make any change to the policy wording, apart from renumbering it as Policy 45.</p> <p>The 2023 draft has still not modified this policy number (now 28) to make it Compliant.</p> <p>This is potentially a ‘groundhog day’ repeat of what happened with the HDPF that ultimately resulted in the Planning Inspector insisting that HDC modify the equivalent policy 43, when HDC could have listened to both SE and the public and made the change much earlier in the process.</p> <p>Will HDC explain why it has again failed to react to this important objection and persisted with a wording that would potentially allow re-development of such facilities based on financial viability without taking fully into account the sporting need, in clear breach of NPPF para 99?</p>
	<p>Thank you for your question.</p> <p>Sport England’s representation at Regulation 18 stage did not object to the current wording of criterion 3.b. Instead, Sport England requested that additional criteria are included after this criterion. The additional criteria suggested duplicate the wording in paragraph 99 of the NPPF. Local Planning Authorities are advised against duplicating the NPPF in their Local Plan (as the wording of the NPPF can change, rendering plans immediately out of date). Therefore, the change has not been incorporated. It is important to note that in addition to a Local Plan, the NPPF is also a material consideration in any planning decision and the content of the this document will also be taken into account.</p>
2	<p>Where can I find the revised site assessments for all sites being considered within the HDC Local Plan process using the updated site assessment template as seen in Horsham District Council document reference HDCIR:7154?</p> <p>I can only find the old template for site assessments within the evidence base for the Local Plan & this leads me to question if all sites being considered have been reviewed against the new template and criteria. The site assessment process needs to be equitable, open, consistent & transparent if the resultant decisions are to be robust and evidenced and the site owners/site promoters need to be able to review the assessments to ensure the evidence supplied to HDC has been correctly presented. I ask because the site assessment in Horsham District Council document reference HDCIR:7154 was only sent to me yesterday & I have been unable to find it within the evidence base for the Local Plan.</p>

	<p>Thank you for your question which relates to an FOI request you have submitted to the Council.</p> <p>The updated Site Assessment Report is now published on the Council's website and is available for review on the Horsham District Council evidence base pages. The summaries of these assessments are also included in the Council Papers as Appendices 7a, 7b and 7c. This is an update of earlier assessment work which supported the Regulation 18 consultation held in 2020.</p> <p>If the Plan is agreed this evening, there will be an opportunity to submit formal representations as part of the Regulation 19 consultation between January 19 and 1 March 2024.</p>
3	<p>(question refers to Draft Local Plan chapter 8). Would the Council please provide information on the assessment that has been made of the capacity of Rusper Parish's rural road network to safely carry the expected additional density of traffic stemming from the Local Plan's cumulative building allocation to Rusper Parish and its immediate vicinity.</p>
	<p>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 document is available to view on the Local Plan evidence base pages. This work identifies mitigation measures which would be required to accommodate levels of increased traffic in the District including in Rusper parish. 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.</p> <p>This will be helped by the extension of high quality Fastway bus services to serve the development, and a design concept that encourages active travel which will include direct, attractive walking and cycling links to Ifield Station and village, and into Crawley Town.</p> <p>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.</p>
4	<p>Strategic Policy 7 - Appropriate Energy</p> <p>The paragraph states that Renewable and low carbon energy sources can include Energy from Waste (EfW). Clarification is required on the definition of EfW as while this can be low carbon when sourced from say Anaerobic Digestion (AD), it is certainly NOT Renewable or Low Carbon when sourced from an incinerator. If the latter, then it should not appear in the list at all. If the former, then this should be specified as such. The list as it stands, could imply an energy hierarchy, in which it is potentially putting EfW incinerators ahead of Solar and Wind.</p>

	<p>What is your definition of EfW, from what source? If this includes incineration then this is not Renewable or Low Carbon.</p>
	<p>Thank you for your question.</p> <p>The reference to waste heat sources in Policy 7 is not a direct reference to Energy from Waste. Instead it refers to a means of delivering low carbon heating, such as District Heating schemes where excess heat from municipal buildings can be used to heat homes rather than requiring additional carbon based energy sources.</p> <p>I do however note that paragraph 5.16 does refer to energy from waste. Whilst this paragraph is a list which simply seeks to set out a list of possible low carbon sources of energy, I accept that with the forthcoming implementation of food waste collections, this form of energy generation may be not be such a low carbon source of energy than initially envisaged. If the plan is agreed this evening, I am content that officers could consider proposing the deletion of this particular reference to a planning Inspector as a minor modification to the plan in due course.</p> <p>It may be helpful for you to note that the matter of the Horsham Incinerator is a the responsibility of West Sussex County Council as the waste and minerals planning authority, and this Council is not the decision maker in relation to this matter.</p>