



# West Grinstead Parish Council

## **HORSHAM DISTRICT LOCAL PLAN 2019-2036 – REGULATION 18 CONSULTATION**

HDC is engaged in reviewing its current local plan. They have just started a consultation. It runs until 30 March. It has some potentially momentous proposals so far as our parish is concerned. It is important that we all understand exactly what is involved and that we make our views known to HDC and that is what this evening is about.

This presentation is going to be in 3 parts; first the background; second the proposals as they relate to this parish and third, what you all need to do to make your views known to HDC. At the end there will be an opportunity to raise any questions you may have and we will try to answer them as best we can.

### **Background**

Starting then with the background, all local authorities are charged with developing a local plan setting out a range of planning policies, which govern planning matters in the district; in particular, setting targets for new housing. HDC has something called the Horsham District Planning Framework. It was adopted as recently as November 2015 and it committed HDC to delivering 800 new homes a year.

All local authorities have to review their local plans at least every 5 years. However, when the HDPF was approved by the Planning Inspector back in 2015, he stipulated that the HDPF would have to be reviewed after 3 years.

HDC did therefore start their review in 2018 and here we are about 2 years later and not a lot of progress has been made. What we know is that at the time of the last Census in 2011 the population of the District was 131,300. In 2019 that was estimated to have grown to 141,717 (increase of just under 8%) and in the next 20 year period to 2039 it is estimated it will grow by a further 17,658 or 12.5%. The population will grow in all age groups, but by far the largest growth will be in the over 65 population and in particular, in the over 75's.



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In the past, it has been an imprecise art calculating housing need. There were almost as many ways of calculating it as there were local authorities.

Therefore, the government has introduced a standard methodology. Applying that produces a figure of 965 new homes a year (a 20% increase) and from November this year, that figure will take over from the current figure of 800.

This standard methodology or formula is based on the government's assessment of housing need. It is based on data going back to 2014. There is though more recent data showing a reduction in housing need. The Government, for the moment at least, is choosing to ignore that. I suspect they are doing that quite knowingly because, as they see it, we have a housing crisis in this country. For whatever reason, we are not building anything like enough new houses. As you read through this draft Local Plan, the term that keeps appearing is a 'step change' in housing growth. Whether we like it or not, it is clear that this time around, there is going to be a major increase in the number of new homes HDC is required to take. It is going to affect everyone in Horsham District, but it is going to affect us in this Parish rather more than most.

### Duty to Co-operate

If HDC just had to provide for the housing needs of its own residents, it would now be a simple enough matter to quantify the number of new homes it would have to provide. Where it becomes difficult and where it becomes distinctly more painful for us in this District, is that HDC is under a duty to co-operate with its neighbours. To the north that means Crawley and to a lesser extent, Reigate and Banstead and the south London local authorities and to the south, it means the coastal strip of Brighton and Hove, Adur and Worthing. All of them have constraints on the land they have available and therefore have a need which they are unable to meet themselves. Horsham District has a duty to take some of that unmet need.

I think it is probably fair to say that the most significant neighbour in this context is Crawley. They are going through a review of their own local plan at the moment. In fact, they are a bit more advanced than Horsham. Their



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consultation period expired on 2 March. At the moment, they have quantified their unmet need at 5,925 new homes, equating to 395 a year. HDC already contribute to their unmet need. Of HDC's current figure of 800 new homes a year, 150 is attributable to Crawley, so strictly speaking, Horsham District's own need is 650 and would increase in November to about 800.

For the moment, HDC are proceeding on the basis of 3 different options where housing numbers are concerned:

1,000 homes a year, which would meet the minimum local housing need applying the Government's standard formula, with a 5% buffer to provide flexibility, but with no additional provision towards the unmet need of its neighbours

1,200 homes a year, which would meet its own need and a 5% buffer, plus an additional 200 homes a year to help meet the unmet need of Crawley and a small element towards the coastal strip and

1,400 homes a year, which would mean an additional 400 homes a year towards Crawley and the coastal strip.

Obviously, 1,200 homes a year would represent a 50% increase on current figures; 1,400 homes would be a 75% increase and that is on figures agreed only 4 years ago.

### Call for Sites

Given the number of new homes HDC will have to come up with, the intention has always been that sites would be identified in the new Local Plan which would provide the bulk of the new homes. 9 strategic sites have therefore been put forward which would each provide upwards of 1,000 units. They range from land west of Ifield, which is effectively a site owned by the government, which would, in theory, provide 10,000 new homes, to land west of Billingshurst, which might provide up to 1,000. Also put forward are about 500 secondary sites offering less than 1,000 units. The advantage these smaller sites offer is that they are often quicker and simpler to deliver.



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Taken together these sites would offer far more homes than HDC will ever need, even on the most pessimistic projection. We must not therefore rush to think the worst just because a site in our parish is put forward. But, we do have to accept that HDC will probably need to resort to 2 or 3 of the large strategic sites and a good number of the smaller secondary sites.

Originally, it had been thought that by the time HDC Issued its draft Local Plan in January, they would have allocated the favoured sites to be included in it and, subject to consultation. those would be the sites to be developed. In the event, they have not done that because of the continuing uncertainty over the unmet need. Therefore, they have not really ruled out any sites at this stage and all the sites, all 9 strategic sites and all 500 secondary sites have gone through to this first consultation stage. Later in the year, that difficult choice will have to be made and there will then be a second consultation. I suggest that if any of our sites are included in the draft Local Plan issued in the autumn, the reality is that they will almost certainly remain in and will ultimately be developed, so the challenge for us is to ensure that they are knocked out at this stage and never make it into the second consultation.

### The Proposals and West Grinstead Parish

1. **Buck Barn** – this is the main headline issue for us. This site is being promoted by Thakeham Homes and the plan is that it would provide 3,500 new homes. a secondary school, 2 primary schools and involve a flyover to take the A272 over the A24 and, in the process. do away with the traffic lights at Buck Barn. Thakeham accept that the new homes would have to be phased at about 300 a year over more than 10 years. HDC are more cautious. They have done RAG assessments on all the 9 strategic sites. Their view in relation to Buck Barn is that 3.500 new homes could not be delivered within the plan period (2019 to 2036). They regard 2,000 to 2,500 as more realistic.

What are the factors against Buck Barn? [Neil Jacobsen]

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- strategic development – applying HDC’s own criteria, new development should be focused around the key settlement of Horsham
  - climate change and sustainable transport – new development needs easy access to public transport and, in particular, to a train service
  - climate change and air quality – even in West Sussex, air pollution is becoming a serious problem. Cowfold is an Air Quality Management Area because of the traffic congestion caused by the 2 mini roundabouts in the village. BB would only exacerbate the problem.
  - countryside protection – access to the countryside is fundamental to our wellbeing. It has to be protected.
  - the danger of piecemeal improvements to the A24 between Ashington and Southwater. Previous schemes have stressed a balanced package of measures. Removing the traffic lights would only increase risks elsewhere on both the A24 and the A272.
2. **Mayfield** – Mayfield is another of the proposed strategic sites. This would provide up to 7,000 new homes on land carved out of Henfield, Shermanbury and Woodmancote parishes. It would be a new town on our doorstep. Nearly all the same factors would apply as for Buck Barn. In particular, it would inevitably place considerable additional pressure on local roads. In fact, it might have a greater impact on Partridge Green than Buck Barn.
3. **Partridge Green upgraded to large village in the settlement hierarchy**  
To those living in Partridge Green, this is likely to be most significant single issue in this consultation. In the Local Plan, all the villages in the District are graded according to their size, facilities and sustainability.
- at the top is the **main town**, characterised as having a large range of employment, services and facilities and leisure opportunities.



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Strong social networks with good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements. Horsham.

- **small towns and larger villages** – This is where HDC would now place Partridge Green so listen carefully because this is how HDC describes them. They are settlements with a good range of services and facilities, strong community networks and local employment provision together with reasonable rail and/or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements or each other to meet some of their own requirements. The other villages in this category are: **Billingshurst, Bramber, Broadbridge Heath, Henfield, Pulborough, Southwater, Steyning, Storrington, Upper Beeding.**
- **medium villages** – this is where we were and where I suggest we should remain so again, listen carefully. These are what HDC describe as settlements with a moderate level of services, facilities and community networks, together with some access to public transport. They provide some day to day needs for residents, but rely on small market towns and larger settlements to meet a number of their requirements. **Ashington, Barns Green, Cowfold, Rudgwick and Bucks Green, Slinfold, Thakeham, Warnham, West Chiltington.**
- **smaller villages** – villages with limited services, facilities, social networks but with good accessibility to larger settlements or settlements with some employment but limited services, facilities or accessibility. Residents are dependent on larger settlements to access most of their requirements. **Christ's Hospital, Lower Beeding, Mannings Heath, Rusper, Small Dole.**
- **secondary settlements** – this is a new category and it is where both Dial Post and Littleworth would sit. These are very small villages that generally have some limited local employment, services or facilities (which may include primary schools,



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allotments, village halls, playing fields or a church) and/or evidence of a defined local community. Proximity and access to other services, facilities and employment is also taken into account. Additionally, settlement character is material, for example form, density, age and historic character of dwellings, and the overall sense that one has left the open countryside and entered a defined village community. **Adversane, Ashurst, Blackstone, Colgate, Coolham, Crabtree, Dial Post, Faygate, Ifield, Kingsfold, Littleworth, Maplehurst, Monks Gate, Nutbourne, Nuthurst, Shermanbury, Shipley.**

- **unclassified settlements** – settlements with few or no facilities or social networks and limited accessibility, that are reliant on other villages and towns to meet the needs of residents. **All other settlements.**

The intention is that development will be permitted within towns and villages that have defined built-up area boundaries (which PG does). 'Any infilling will be required to demonstrate that it is of an appropriate nature and scale to maintain the characteristics and function of the settlement in accordance with the settlement hierarchy.' So basically, larger villages will be expected to take more new development than medium villages and medium villages will be expected to take more than smaller villages, proportionally as they are judged to be more sustainable and thus better placed to assimilate that new development.

When the previous Local Plan, 2007 Core Strategy was introduced, the first draft classified Partridge Green as a Category 1 Settlement (towns and villages with a good range of services and facilities as well as some access to public transport – capable of sustaining some expansion infilling and redevelopment). Representations were made that it should in fact be a Category 2 Settlement (villages with a more limited level of services which should accommodate only small-scale development or



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minor extensions that address specific local needs). These were accepted by HDC.

The classifications were reviewed in 2014 when the current HDPF was introduced. In the Settlement Sustainability Review, the summary as regards Partridge Green read: 'This settlement has a relatively young age structure for the District with more young adults (15-24 year olds) than in many other settlements. It has a number of local employment sites, although travel to work data indicates that most residents still travel outside the village for work. The village does however have a good range of local services and facilities, including a local primary school, a range of shops and a good range of community facilities, including recreation ground, village halls, 2 branch GP surgeries and recently created allotments. There also appears to be a strong sense of community with a number of local clubs and societies. There is an hourly bus route to the village.' The Key Sustainability Issues were identified as being: 'This settlement has a number of strong sustainability features, but its relatively isolated location and limited public transport mean that the settlement is strongly reliant on private car. There is a need to ensure that these local facilities remain viable. but high levels of development would result in an increase in unsustainable travel patterns.' The recommendation therefore was that the village be classified 'Medium Village'.

I suggest that very little has changed since then except, of course, that the Larger Villages have got bigger. So how do we feel about being put on a par with the likes of Billingshurst, Henfield and Storrington? It seems to me is is absolutely ridiculous. We do not have the same size, the same level of shops, the same healthcare facilities, the same level of public transport, the same road network. What it would mean, in practice, is that PG would be required to take significantly more housing than it has over say the last 10 to 15 years. We will come back to this in a minute but for now I hope we can all agree is that this is something we absolutely have to fight. Significantly, there are only 2 villages that HDC



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are proposing to upgrade. PG is one of them. The other is Thakeham, which they are proposing to upgrade from a small to a medium village.

4. **secondary settlements** – Before we move off the subject of the settlement hierarchy, we need to come back to secondary settlements. As I said, this is an entirely new classification.

What it means for both Dial Post and Littleworth is:

‘Development will be permitted in secondary settlements, provided also that it falls entirely within the secondary settlement boundary as defined on the Policies Map, and meets all of the following criteria:

1. the site is a small gap or plot within an otherwise built-up or cohesive settlement form
2. the proposal is limited in scale to reflect the existing scale and character of the settlement function and form
3. the development does not result in a significant increase in activity including traffic movements on narrow and rural roads. ‘

The critical thing therefore may well be the secondary settlement boundary. We do have copies of these. If you live in either DP or L you will want to see these. We also have some inkling now of what it might mean in practice because there was an application for the Cottons’ old house in Littleworth Lane; an application to demolish it and build 2 new houses in its place, That application was recently granted largely off the back of this new policy. So you have to anticipate that there may be rather more such applications in the future.

5. **potential 200 new homes for Partridge Green** – you will recall that there are about 500 smaller sites (i.e. less than 1,000 units), included in this consultation process. 4 of them are in PG, namely:

- 5.1 land west of Church Road, what we have always thought of as land north of The Rosary. HDC have identified this as being capable of taking 70 new homes.



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- 5.2 land north of The Rise – 55 new homes
- 5.3 Dunstans Farm – i.e. Keith Price's land on which there is a current application for up to 60 homes from Gladman Homes. HDC have identified that as capable of taking 90 new homes
- 5.4 Dunstans i.e. land immediately east of Dunstans Farm, which HDC have identified as capable (with Dunstans Farm) of taking 110.

On these figures, they could collectively provide 235 units, but for some reason HDC has rounded the total down to 200. However, that would be in addition to any houses allocated under any neighbourhood plan and there is of course a draft West Grinstead Neighbourhood Plan which has Huffwood identified for about 50 units, subject to the current Huffwood tenants being offered new commercial units on land to the south of Star Road.

Of the 500 odd smaller sites, HDC are probably only going to need to resort to a relatively small proportion of them. I have not yet seen any justification for upgrading PG, but my suspicion is that PG is perceived to have escaped very lightly from all the housebuilding that has gone on over the last 5 years and certainly if you compare us with most of our neighbouring villages, it is difficult to argue with that.

The draft Neighbourhood Plan is very much based around developing brownfield land, which is a policy which the draft Horsham Local Plan encourages. It is though beset with difficulties as it is much more difficult to deliver than greenfield sites. It seems to me that our strategy in relation to this part of the consultation should be:

- to challenge the upgrade to a larger village
- to promote the strategy of developing brownfield rather than greenfield sites
- to press ahead with the Neighbourhood Plan just as quickly as we can, accepting that we shall have to review it within a very short period
- accept that going forward, it may be unrealistic to suppose that we can defend all the greenfield sites



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6. **employment site allocations** – HDC is looking for additional employment sites. 2 sites are identified in our Parish, namely:

6.1 land south of Star Road – we did know about this because HDC will not allow the loss of the employment space afforded by Huffwood unless it is replaced by at least a corresponding amount of space elsewhere. In fact, this would afford sufficient space to also relocate older units at the northern end of Star Road and free up those units for residential.

6.2 land north and south of Buck Barn Filling Station – HDC’s comment in relation to this is: ‘A total of 5.5 ha of land has been identified north and south of the A272 that may have potential for B1, B2 and B8 uses (basically industrial, light industrial and warehousing). Access to the site may be difficult to achieve as a standalone development due to the existing traffic flows around the Buck Barn crossroads. Land at Buck Barn to the west (in fact, it is to the east) has been proposed for a strategic housing allocation; should this site be allocated, the potential of this land to provide supporting business uses should be considered.’

### How to make your views known to HDC

HDC want us all to do this online. You do not have to. You can fill in a prescribed comments form. I think you can even do an email or letter, but you are encouraged to then relate each of your comments to a specific part of the consultation document and if you don’t, the risk is that your comments will be disregarded.

### online

First, before you can start commenting, you need to register. Once you have submitted your personal details, you should receive an immediate confirmation, There should be a prompt to ‘Activate your account’ Click on that and you should be able to start HDC have issued some ‘Guidance Notes on How to Make Comments. A copy will be available on the PC website. My observation is that the whole process is rather more difficult than it should be



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so my advice would be to register as soon as you can. Don't leave it until the last minute. You will then have a much better idea of what is involved and, if you have to, to adopt a Plan B.

Once you have registered, then you can start going through the consultation document. There are a number of prompts where you are invited to comment. You do not have to comment on everything. You almost certainly won't want to. It would take forever. There are 188 pages, so even skim reading it is going to take long enough.

When you do click on one of the comment boxes, there are 4 sections.

- you are asked the nature of your comment and invited to click on either support, object or observation
- there is a block, 'summary' and you are invited to 'Please add a brief summary of your comment'
- there is then a block for the comment itself
- a block for any proposed change you might suggest to the text and an ability to attach documents if you want to

Having completed the section, or as much of it as you want, you need to click 'Submit Comment'. The first time I did this, I looked round in vain for a save prompt, but I couldn't find one. I rang HDC. They told me I should click Submit Comment as I went along and I was assured I could come back at any stage up until the close of the consultation on 30 March to add comments, or amend earlier comments as I wanted.

### Hard Copy

If you prefer, you can comment using a hard copy, but there are a couple of complications in doing so. First and foremost you will not have access to the consultation document, unless you choose to buy one from HDC or you go down to one of the local libraries. The other thing is that HDC would like you to use a Comments Form. This is one of them. The way it is set out you would have to use this to comment just on one question so if you wanted to



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comment on say 6 separate questions, you would need 6 separate forms and you would need to fill in your personal details on all of them. Very clunky!

If you prefer to do an email or letter, then I suggest you set it out by reference to the comments form and probably confine yourself to what are the key issues so far as you are concerned.

Copies of all these forms will be available on the WGPC website from tomorrow. If you don't have a computer or a printer; if you need any help with copies or indeed if you have any practical difficulties with commenting online, then pop into the Parish Office and have a word with our Clerk, Jane Bromley, but please check the Office opening hours first. Alternatively, ring Jane on the 01403 710270.

I have done a word document myself of the comments I am proposing to make. I haven't used the comments form but I have followed that format. I am intending to use this to comment online nearer the end of the consultation. Again a copy will be available on the PC website.

I should stress that this is not the PC response. We have not actually agreed that yet. We wanted to wait until after these two public meetings. These are just my initial thoughts as to what I might say myself. I hope though that what it does do is highlight the key questions and the issues we might refer to. I am conscious that my reasons for objecting are not necessarily exhaustive. There may be other reasons you would want to mention

I also want to stress that this is not a prompt that we want everyone to parrot. In fact, it would be much better if you don't. It is intended as an aide to highlight the issues for our parish and some of the points you may want to touch on. It would be much better though if you go through them; decide what you think, answer as many or as few as you want and put it in your words. I think our case will then be much more persuasive.

That is all I was proposing to say. If anyone has any questions.