



Our Ref: BB/9.25

13 October 2011.

Development Management
Horsham District Council
Park North
North Street
Horsham
West Sussex
RH12 1RL

Dear Sirs

Billingshurst Parish Council
Response to Planning Application DC/11/1654
550 Houses
Land East of Billingshurst

Summary Statement

Billingshurst Parish Council **OBJECTS** to this planning application:

Only 22 %¹ of the country has an adopted Core Strategy. Horsham District Council was in the first three local planning authorities to adopt their Core Strategy. Billingshurst Parish Council supports the Core Strategy and welcomes HDC's intention to continue to plan, monitor and manage development in the Horsham district.

However, this planning application represents the first phase of a massive strategic site to the east of Billingshurst which, if eventually fully permitted, is set to almost double the population of Billingshurst. Such development is contrary to the local planning framework. Adopted planning principles and Core Strategy policies CP4 and CP5 seek to concentrate new large-scale development in two mixed-use strategic locations on the edge of Horsham and Crawley – an approach that was endorsed by the South East Plan. It is the clear intention of these Plans to focus the delivery of new housing to meet the District requirements in sustainable locations which have the necessary infrastructure, services and community provision or where this provision is planned.

The potential for further development at Billingshurst was examined but it was rejected as a strategic location for development at this stage, given the opportunities which exist for sustainable development in the vicinity of Horsham.

The Parish Council calls upon HDC to commit resources to bringing forward development at the strategic locations at an accelerated rate. If, despite such efforts, the needs of the district are not being met in the short term, then BPC argues that no further expansion of Billingshurst should be approved unless and until, opportunities for development in more sustainable locations adjacent to Horsham have been realised.

¹Database on Local Development Frameworks Closure report – end December 2010

Billingshurst Parish Council sets out below its reasons for objecting to this planning application:

1. Localism

The Localism Agenda – Shifting Power to Local Communities

In a letter dated 15th December 2010 to Chief Planning Officers from Steve Quartermain, Chief Planner, DCLG with regard to the Localism Bill, it is stated, *“I am writing to you to draw your attention to the Localism Bill which was published on Monday 13th December. The Government has been clear that it intends to bring forward a number of reforms to the planning system, aimed at restoring democratic and local control and shifting power to communities. The Localism Bill is a key vehicle for achieving this.”*

It is considered that as the Localism Bill which expressly says that local people should be consulted and that the developer should take into account their views; that even though the Bill is not yet law, the local planning authority should consider the intent of the bill when looking at planning decisions on the scale of this application. There is a concern that if this development is approved it is just the start of a massive strategic site on land east of Billingshurst, as evidenced by the provision of land for a three form entry primary school. (One form entry for every 1,000 houses).

Then, in the forward to the DCLG publication, A plain English guide to the Localism Bill, Update, June 2011 Greg Clarke MP talks of *“....a huge shift in power - from central Whitehall, to local public servants, and from bureaucrats to communities and individuals”* and describes the Localism Bill as setting out *“a series of proposals with the potential to achieve a substantial and lasting shift in power away from central government and towards local people..... to make the planning system more democratic and more effective, and reform to ensure that decisions about housing are taken locally.”* The guide goes on to state, *“There are, however, some significant flaws in the planning system as it stands. Planning does not give members of the public enough influence over decisions that make a big difference to their lives. Too often, power is exercised by people who are not directly affected by the decisions they are taking. This means, understandably, that people often resent what they see as decisions and plans being foisted on them. The result is a confrontational and adversarial system where many applications end up being fought over.”*

Billingshurst Parish Council has embraced the government's shift in power for local planning; it has always fully participated in strategic planning consultations and will continue to do so.

The Parish Council urges Horsham District Council to embrace the Localism Agenda and recognise the strong local feelings and take this into account in determination of this application.

Horsham District Council should oppose this application, reaffirm its support for the development of land at the strategic locations west of Horsham and Crawley and intervene to address the obstacles to house building at an accelerated pace at these sites.

2. Government Planning Policy

In the Design and Access Statement published by the consortium, there is reference to government policy, "*On 15 June 2011, the Government published their definition of the Presumption in Favour of Development. This guidance followed the Ministerial Statement of March 2011 entitled Planning for Growth. This provides clear guidance on the Government's ambitions for sustainable development. In short it states that local planning authorities should plan positively for new development, and approve all individual proposals wherever possible. Specifically local planning authorities should:*

- *Prepare local plans on the basis that objectively assessed development needs should be met, and with sufficient flexibility to respond to rapid shifts in demand or other economic changes;*
- *Approve development proposals that accord with statutory plans without delay; and*
- *Grant permission where the plan is absent, silent, indeterminate or where relevant policies are out of date."*

The Parish Council supports the notion that local planning authorities should '*plan positively for new development*', but would like to see Horsham District Council refuse this planning application and thereafter reaffirm its plan-led approach through the Core Strategy Review.

Press Notice, Positive Planning: a new focus on driving sustainable development, 15 June 2011. It is noted that "*the Government is taking substantial steps to help local communities protect greenfield sites as they plan for sustainable growth.*"

The planning application site is greenfield land.

3. Adopted Core Strategy

Billingshurst Parish Council urges the Council to place weight on the government's intention to abolish Regional Spatial Strategies and revert to the Council's adopted Core Strategy which states in paragraph 4.30, bullet point 6 - "*no provision before 2018 for any further large scale development at Billingshurst but recognition that this position may need to be reviewed in the future, particularly with regard to the need to relocate businesses and redevelop some of the existing industrial areas as part of a comprehensive planning strategy*".

This development is not needed to relocate businesses or to re-develop some of the existing industrial areas as part of a comprehensive strategy and should be judged in the context of Policy CP8, "*Limited provision may be made ... for small scale extensions to the smaller towns and villages to meet identified local needs and assist in the gradual evolution of these communities by enabling development which meets their needs but does not fundamentally undermine the qualities which make them or their countryside setting unique and special.*".

Furthermore, whilst there remain substantial development opportunities at the strategic locations, the release of land for a major expansion of Billingshurst would be contrary to the adopted spatial strategy for Horsham district which argues in favour of focusing such development in or adjacent to the main urban centres of Horsham and Crawley. The case has not yet been made for the need to abandon this strategy in favour of major development releases in locations remote from these main urban centres.

The proposal contradicts other key Core Strategy policies.

- "*The landscape character of the District, including the settlement pattern, together with the townscape character of settlements will be maintained and enhanced.*" (Policy CP1)
- "*The release of land for housing will be managed in order to ... give the necessary priority to the reuse of previously developed land within built-up areas.*" (CP9)

4. Planning Policy Statement 3

Paragraph 69 of PPS3 requires Horsham District Council to have regard to "*ensuring the proposed development is in line with planning for housing objectives, reflecting the need and demand for housing in, and the spatial vision for, the area and does not undermine wider policy objectives*". The Policy Statement goes on to make it clear (paragraph 71) that this requirement applies even when the local planning authority cannot demonstrate an up-to-date five year supply. It states explicitly that the authority must determine applications "*having regard to the policies of this PPS, including the considerations in paragraph 69*". Any short term benefit of the current planning application, if it was built out immediately, in terms of pure numbers would not be justified under this policy. Planning permission would undermine the existing spatial vision for the area and would compromise the ability of Horsham District Council and the local community to review housing land allocations through a proper plan-led approach.

5. Five Year Housing Land Supply

Billingshurst Parish Council has always contended that any five year housing land supply shortfall is a district wide problem, which should be handled with a district wide solution. Yet for the parish of Billingshurst, it is being expected to accept more than its fair share of the district's development. This application should be considered in the context that 67 houses have already been permitted at Land South of Hilland Farm, Billingshurst (DC/09/1794) to address this perceived district wide 5 year housing land supply shortage and there is an outstanding appeal for 150 houses on land south of Gillmans (DC/10/0939).

It should also be recognised that only a percentage of the proposed 550 houses – unlikely to be more than 30% - will come forward to meet the current 5-year supply shortfall.

There is more opportunity for smaller settlements to integrate into communities and bring benefits to that community through s106 funding and affordable housing to address locally identified housing needs. This proposal is contrary to development plan policies (CP8) which seek the gradual evolution of communities.

In a recent appeal decision (AA/L1765/A/10/2126522, Cala Homes, Winchester), the Secretary of State balanced the short term housing-land supply case for development against the opportunity of a local planning authority to determine a bottom-up housing land release strategy. In that case, he concluded that PPS3 considerations should not undermine the ability of the authority to complete its core strategy review in consultation with local communities. The case also turned, as with the consortium’s application for east of Billingshurst, on a fundamental conflict with the development plan ... “the development of this attractive greenfield site would undermine the character of the landscape and the key characteristics of the relevant Landscape Character Areas.”

6. Core Strategy Release for Identified Local Needs

A further element of the Core Strategy (Policy CP8) has been the limited release of smaller scale sites to meet identified local needs or enable the continued evolution of local communities. Such development needs to be clearly justified and should not undermine the essential form, setting and character of the settlements concerned, either directly or by the potential cumulative impact (paragraph 4.7, Strategy Principles).

An extension to the built up area to accommodate 550 houses fails to satisfy these Strategic Principle tests. Furthermore, land has already been included in this application for a three form entry primary school to serve a potential of 3,000 houses and this scale of development would seriously undermine the character and landscape setting of Billingshurst, by almost doubling the size of the village.

Housing building rates (1989-2008) for category 1 settlements in the ‘Rest of Horsham District’ reveal a startling picture of recent development over the last 20 years. The data in the table demonstrates that, whilst Billingshurst and Southwater have accommodated a similar amount of house building over the full period, no other category 1 settlements in this list has accommodated more growth since 1998 than Billingshurst.

Category 1 Settlement	No. of Houses Built 1989-1999	No. of Houses Built 1999-2008	Total No. of Houses Built 1989-2008
Billingshurst	395	904	1299
Henfield	225	169	394
Pulborough	210	234	444
Southwater	987	322	1309
Steyning	270	200	412
Storrington	180	374	444

7. Transport Links

The Office of National Statistics for the ward of Billingshurst (2001 Census) identifies 3,352 persons travelling to work of which 269 (8%) travelled to work by train and just 35 (0.1%) used the bus. The remainder (91.9%) walked or used a private vehicle. Although the UK has witnessed an increase in passenger numbers on many routes in the last ten years, the attractiveness of rail services from Billingshurst, particularly to London, has suffered. Journey times between Billingshurst and the capital have increased substantially in consequence of improvements to services from stations nearer to London.

There appears to be no evidence to suggest that an enhancement of either bus or rail services at Billingshurst will make a significant difference to the propensity of local people to use public transport. HDC in their draft Horsham Town Plan state, *'Although the Council is seeking to achieve a modal shift towards more sustainable means of transport, it recognises the importance in ensuring that the car continues to be a viable and popular means of access, as a significant proportion of customers will continue to use the car for their journey to the town centre to enjoy the proposed enhanced retail and leisure offer.'*

Therefore, given that employment opportunities in the village are not planned to grow at a pace to match the number of adults of employable age, the building of 500 houses can only swell the number of out-commuters adding yet further pressure on the local road network. The A29 is already significantly constrained by its limited capacity and by heavy commuter traffic into Horsham. The A272 is a winding across-county road not designed for increasing traffic volume without prejudicing its safe and free flow.

Currently, all traffic using the A272 through Billingshurst travels along East Street, down the High Street and then out on to West Street, right through the heart of the Conservation Area. Any increase in the volume of this traffic will bring disturbance and danger to people, particularly school children using this road (and pavement) network.

Taking traffic from the A272 via a north east bypass linking up to the existing (north west) bypass must be an essential prerequisite of an eastward expansion of the village. However, whilst such an addition to the local network might relieve conditions in the village, it will do nothing to address the capacity and safety shortcomings of the wider network that large scale development east of Billingshurst will expose.

West Sussex County Council has already identified a significant number of constraints in the highway network around Billingshurst; in particular the humped back bridge on the A272, accidents at Coolham crossroads and along the A272 and capacity at Buck Barn crossroads where the A272 joins the A24. The bridge over the River Arun at Newbridge is also a significant constraint on the A272, which becomes impassable after periods of heavy rainfall.

The Council fears that any additional traffic on the local road network will inevitably see a corresponding increase in injury accidents. The County Council is also currently undertaking a survey of all residents on the parking problems in Billingshurst, exacerbated by commuter parking, both from within the parish and its hinterland (West Chilington, Ashington, Thakeham, Wisborough Green, Loxwood,

Kirdford, Ifold, Alfold Bars, Petworth, Midhurst, Coolham, Shipley, Barns Green, Coneyhurst) in the narrow streets around the station area.

Investment in public transport services (rail or buses) in locations, such as Billingshurst, that are remote from main settlement centres is unlikely to offer anything approaching the sustainable transport benefits available at locations in much closer proximity to Horsham, Gatwick and the main south coast settlements. In the more remote locations, the prospects for achieving a significant reduction in the dependence on the use of private motor vehicles are very poor. The County Council has also announced £2 million of cuts to the subsidy for bus services over the next three years. It is this consideration that forms the basis of the adopted spatial strategy to focus major development in and adjacent to Horsham and Crawley.

8. Spine Road

Referring to appendix 4 of the Interim Statement, paragraphs 6.21 and 6.22 HDC state that, *“WSCC has identified a number of constraints on the A272; the existing humped back railway bridge (width and alignment), Coolham Crossroads (accidents and traffic speeds), Buck Barn Crossroads (capacity and queuing) and A272 (accidents). Road safety issues at the junction of New Road with the A29 to the north of the site....*

Again in relation to the progression of a larger strategic development site East of Billingshurst, WSCC indicated the following likely transport infrastructure requirements, which may also be relevant to a smaller release of land:

The provision of a road to take A272 traffic around Billingshurst and away from the village centre.”

There is an identified need for an east – west bypass around the north eastern quadrant of the village, not a spine road which is effectively taking the east – west bypass right through the centre of the proposed new residential area. Residents on the west side of the village frequently suffer noise nuisance from speeding motorcycles, which will use this new spine road on their route east – west across the county.

The spine road will take commuter traffic, HGV’s and motorcycles through the centre of the new housing development. The consortium of developers have already acknowledged in the Design and Access statement in paragraph 4.2, *“Because of the potential number of users of the inner spine road noise could be an issue, to counter this it was suggested that built form directly adjacent to this road could act as a defence against unacceptable noise in the proposed dwellings rear gardens.”*

The Parish Council must consider not only the current residents of the village, but also the future residents of the village who could, just like the residents adjacent to the western bypass, find the noise of speeding traffic unacceptable, so much that it affects their quality of life.

The consortium of developers have said in 4.3 of their Design and Access Statement that, *“Due to the nature of the road it would be necessary to ensure no driveways directly access this route, with their associated parking in courtyards to the rear. This has the added benefit of keeping pedestrian vehicle interface to a minimum.”*

The Parish Council has serious concerns about the interface of pedestrians and vehicles along this spine road. The illustrated scheme shows a number of uncontrolled crossings, as well as toucan controlled crossings. Pedestrians will need to use this road to access the new school, doctor's surgery, crèche, dentist, and further afield for the secondary school, children and family centre and station. There could be mixed pedestrian traffic of parents and children, school children, elderly, disabled, workers walking to the industrial areas and commuters to the station using this road at all times of day. Care was taken in the design of the western bypass to avoid such potential hazards, including the provision of a pedestrian footbridge over the bypass to the sports and leisure facilities at Jubilee Fields. However there is more opportunity for additional pedestrian traffic along this spine road, without the benefit of a safe option of a pedestrian footbridge, over what will undoubtedly be a very busy bypass through the centre of the new development.

An advantage of having a bypass on the north eastern boundary of the development would be that it forms a firm barrier to the edge of development as can be observed with the north western Billingshurst bypass. The spine road has housing development on either side, and development could continue to sprawl eastwards in years to come.

9. Spine Road Junction with A272

West Sussex County Council have confirmed that between Billingshurst High Street and Buck Barn there were 13 recorded injury accidents for the 3 year period between 1 Sep 2008 and 31 Aug 2011; 5 of these were serious and 8 were slight. This resulted in 22 people being injured, 7 seriously and 15 slightly. One of these accidents in 2010 involving slight injury to the driver was in the vicinity of the proposed junction with the new spine road.

10. Silver Lane

Silver Lane forms part of a wider residential area on the eastern side of Billingshurst with many roads leading off it to smaller closes. However the road is subject to a weight limit of 7.5 tonnes. The junction of East Street and the new spine road is not far from the junction of East Street and Silver Lane. The new spine road will deliver traffic that would previously have gone through the village or down the bypass to the industrial areas close to the junction with Silver Lane. It will make a convenient short cut for traffic to the industrial areas located close to the station.

Silver Lane is a residential area, that in the peak school times, is heavily congested with parents dropping and collecting children and many children and young persons walking to the nearby primary and secondary schools and sixth form. Through traffic must be discouraged from using this road as a short cut. The bypass would have been situated further to the east making this less likely to be appealing as a short cut.

11. Fuel

It is certain that further development in Billingshurst will lead to more traffic on our roads and an increased demand to fuel these vehicles. Currently the only petrol stations serving Billingshurst are located on the northern edge of the parish at Five Oaks, outside of the parish on the A24 at Buck Barn or south of the parish in Pulborough. Travelling for re-fuelling will only exacerbate the unsustainability of this planning application. The original plans for the north west bypass included the provision of a petrol station.

12. Drainage

The Parish Council met with the Environment Agency on 28 September 2011 to discuss current and future potential drainage issues in Billingshurst. The District Council was invited to send a Drainage Officer to the meeting, but did not attend. It was noted at the meeting that the topography of this area records a high point to the north of the development site and to the south of the site with a valley running through the middle where the natural watercourse runs through the Bowling Alley to join the barrel drain that runs underneath the High Street. The title map of 1841 records a large area of water in this valley too.

A few years ago, the barrel drain became blocked with debris causing severe flooding to the High Street, to the extent that properties had to be accessed via the first floor from a boat. Horsham District Council took the step of installing a large metal grille in the culvert leading to the barrel drain behind 41a High Street, thus accepting responsibility for keeping this area free from debris.

It is the Parish Council's understanding that it is the responsibility of the riparian land owner to keep the watercourse running freely, and it was noted that many riparian owners will have great difficulty fulfilling this obligation as the watercourse is, in places, land-locked and inaccessible. Where the riparian owners are not known, the responsibility for keeping the watercourse free flowing would fall to the District Council.

Any planning permission for this site must be accompanied by a fully supported maintenance plan to keep the watercourses free running and assurance from Horsham District Council that they will meet their obligations as drainage authority. The Parish Council places Horsham District Council on notice of this statutory duty.

Parish Councillors Homer, Leaney, Longhurst and Wilding attempted to follow the watercourse from the Bowling Alley to the barrel drain in the High Street and recorded their journey in appendix 1, which supports the Parish Council's request for a fully supported maintenance plan for the watercourse.

13. Tipping Points

Referring to appendix 3 infrastructure of the Interim Statement, Horsham District Council has identified that Billingshurst reaches the tipping points for waste water treatment, water supply, primary and secondary school places for 500 houses. There are also capacity issues with the highway network.

14. Education Provision

The latest available figures for capacity of the Weald School reveal that the school is running at capacity for the next four years:

11/12	102%
12/13	102%
13/14	103%
14/15	104%

There are severe limitations to the enlargement of The Weald School in Billingshurst. The increase in demand for secondary school places arising from development already approved, as well as that currently proposed, will therefore generate significant additional journeys to schools in Horsham or, if a new secondary school is built there, in Southwater.

These journeys would not only further demonstrate serious sustainability flaws to an eastward expansion of Billingshurst but signal fewer opportunities for shared experiences amongst school children which could frustrate community development in the long term.

Students from the village attending tertiary education establishments must travel out of or live remote from the village. Only Brinsbury College lies within 15km of the village and its teaching 'offer' is very narrowly defined. Other nearby tertiary education establishments can be found in Brighton, Crawley, Chichester, Guildford, Redhill and Worthing. Those reliant on public transport can have a difficult commute to these establishments from Billingshurst where there are no direct public transport links, and/or interchange times are not aligned. Thus there is more reliance on the private car, for those students that are able to drive, and a more limited offer of courses for those that cannot.

15. Acute Healthcare

The parish of Billingshurst sits on the extremity of the catchment area for acute healthcare available only in Worthing, Chichester and the East Surrey Hospitals. All of these hospitals are more than 30 km away from the parish. There is significant reliance locally on the ambulance service and a first response from paramedics and community responders.

	2006	2007	2008	2009	2010	2011
January		15	12	17	12	22
February	4	9	15	17	10	15
March	3	18	11	12	11	22
April	5	20	11	9	13	26
May	6	28	11	20	10	30
June	7	26	14	12	19	16
July	11	35	16	7	18	16
August	6	18	19	18	18	14
September	9	23	12	14	17	
October	4	13	8	19	37	
November	6	11	14	12	22	
December	10	15	15	11	16	
Total	71	231	158	168	203	

The Community Responder service is manned by volunteers from the local community. Billingshurst has no ambulance station, so patients must wait for an ambulance to be sent from wherever the nearest ambulance is located. It is not unknown for ambulances to attend from the south coast, Crawley, Guildford or from Haywards Heath. However, congestion as a result of holiday traffic along the A29 and A272 makes it much harder for the ambulance service to meet its targets in the summer months.

16. Shopping Centre

The viability of the shopping centre in Billingshurst is already under serious threat. The research project into sustainable communities (Developing a Plan for Sustainable Service Provision in the Rural Community of Billingshurst; Wood from the Trees Limited on behalf of Billingshurst Community Partnership; 30 June 2008) found shortcomings in the local retail economy including lack of depth of offer, parking problems and lack of community transport.

The north west bypass has already taken potential passing trade out of the centre of the village and a north east bypass will still further reduce this passing trade. Trade is also vulnerable to changes in the 'offer' of supermarkets some 6 miles south at Pulborough with free parking facilities and a large supermarket some 6 miles north at Broadbridge Heath. The development west of Horsham of 2,000 houses will bring with it more shopping facilities. Billingshurst residents will be attracted to these new 'offers' and may choose stop there on their commute rather than use the facilities in the centre of Billingshurst.

This planning application does not bring with it sufficient planning gain to be able to satisfactorily address the deficiencies of the local shopping offer.

17. Cemetery Provision

St Mary's Churchyard in Billingshurst has been closed for burials since 18 March 1969. There is currently no provision for burials or cremation plots for existing residents. The nearest cemetery is the Hills Cemetery in Horsham.

Ground conditions in Billingshurst are a significant factor in determining the location for a new cemetery and there is little land in the heart of the village that is either available or suitable. The lack of a local burial ground is a highly emotive issue in the village.

Whilst early sight of the plans for land east of Billingshurst showed provision of land for a new cemetery, this has failed to materialise in the submitted planning application.

18. West Sussex Fire and Rescue Service

The parish of Billingshurst is served by one part time retained Fire crew. The nearest manned Fire and Rescue centre is 6 or 7 miles away in Horsham. There are a variety of businesses located within the parish of Billingshurst from a range of industries. A recent massive fire at a business in the parish saw 100 people evacuated with 30 people staying in an emergency rest centre for the night and 50 firefighters from around the county tackling the blaze. Emergency contingency planning must be undertaken when considering any further expansion to the population of Billingshurst.

An increase in traffic will increase the workload of the Fire and Rescue Service. There is currently a consultation to merge the East and West Sussex Fire and Rescue Services.

19. Landscape Character

A number of studies have confirmed that the landscape to the east of Billingshurst is of rural, undeveloped and historic character with high sensitivity to change.

The northern and eastern part of the parish of Billingshurst (north of the railway line) is within the Central Low Weald character area, as defined in the West Sussex Landscape Character Assessment. It is a mainly pastoral landscape with a well-wooded character. It has a gently undulating landform, laid out predominantly to small to medium size pasture fields enclosed by woodlands. This area has a historic character of linear patterns associated with old droveways. Key issues for change to this landscape are loss of woodland cover or diversity of woodland, changes in land management practices leading to loss of hedgerows, loss of tranquillity and vulnerable rights of way network due to increased use and poor drainage management.

This characteristic was broadly endorsed by the Chris Blandford Associates study (2003) undertaken on behalf of Horsham District Council which informed the Horsham District Landscape Assessment of October 2003.

The County Council advises in its land management guidelines for the **Central Low Weald**:

- Maintain the historic character of the area, including the pattern of small fields and network of droveways.
- Maintain and restore hedgerows and shaws.
- Replant and manage isolated trees in pasture.
- Conserve and reinstate small scale hedgerow cover and pasture wherever possible.
- Conserve and manage streamside vegetation and ponds.
- Consider the cumulative impact on landscape character of small developments and land use change. Avoid the introduction of suburban styles and materials.

Chris Blandford Associates (2003)

The Landscape Character Assessment identified individual character areas in the Horsham district of which this planning application area to the east of Billingshurst that is north of the railway line covers character area G3 Slinfold and Five Oaks Wooded Farmlands.

The planning and land management guidelines for **character area G3**, north of the railway line advise:

- Conserve rural undeveloped character. Any large scale housing and commercial development is likely to damage character, e.g. through loss of small scale field patterns and loss of woodlands.

- Consider the cumulative impact of small scale change, e.g. suburbanisation along roads.
- Ensure any appropriate new development responds to historic settlement pattern, local design and building materials and is well integrated into the existing landscape pattern of woodlands, hedgerows and shaws.

These studies confirm that the landscape to the east of Billingshurst is extremely vulnerable to severe degradation in the event that a significant area of land is released here for development. Whilst landscape features, such as hedgerows and woodland, can be retained in any expansion of the village, the attractive and tranquil setting of each feature will be destroyed and their contribution to the wider landscape character of the area lost.

20. Archaeology

The consortium of developers state in paragraph 2.6 of their Design and Access Statement that, *“Desk based assessments conclude that the site has a low to moderate archaeological potential. It is likely that any proposed development could have a potential archaeological impact on below ground archaeological remains of local heritage significance.”*

The Parish Council has been in contact with the County Archaeologist who has reviewed the Environmental Statement and commented that there are a number of features and anomalies indicated by the geophysical survey which, in his view, should be investigated by trial trenching before any 'Masterplan' is firmed up.

21. Biodiversity

The overall carrying capacity of valuable wildlife habitats to the east of the village will diminish as a result of development and, in consequence, biodiversity across the area will decline significantly. The proposed green space in the scheme may not provide an adequate replacement and off-site biodiversity enhancements may be necessary.

A significant increase in the size of the village population will increase the recreational pressure on nearby sites of nature conservation interest. No funds are being offered for habitat enhancement or pressure management to compensate for this effect.

22. Employment

The 2001 Census reveals that there were 3,451 economically active people living in the parish. Despite the presence of significant number of business premises in the village, 60% of these people travelled more than 4km from home to their place of work. Settlements such as Horsham and Southwater are understood to be much more self-contained in this respect. Despite a considerable growth in the number of residents in the village since the 2001 Census, there has been no appreciable increase in the number of business premises in the village, and there may possibly have been a decline. It is likely, therefore, that the 2011 Census will reveal even less self-containment. The Parish Council is disturbed by this trend and would prefer to see it reversed rather than see a more dormitory role for the village.

The employment sites in Billingshurst are principally located around the station in Daux Road, Brookers Road, Myrtle Lane and at Gillmans on Natts Lane. Most have been established over 40 years. These industrial areas are set in the heart of the residential area of Billingshurst. Access can be difficult down residential roads, and noise from movement and transport and work at these sites can disturb the peace and tranquillity of the neighbourhood. The Huffwood Industrial Estate in Brookers Road is especially constrained by the long down-time of the level crossing gates when trains stop at the station. Further still, access to all these areas is impinged by the low railway bridge in Natts Lane, necessitating a circuitous route for larger vehicles along rural country lanes, and Marringdean Road also has a weight restriction.

Paragraph 4.30 of the Core Strategy, bullet point 6, recognised the ‘driver’ for a review of the position in Billingshurst as “*the need to re-locate businesses and redevelop some of the existing industrial areas as part of a comprehensive planning strategy*”. The Core Strategy envisaged that this renewal would take place in the village. It did not acknowledge the need was to accommodate large scale housing growth.

The Parish Council is not convinced that a case can be made for the need to release 35.26 hectares of agricultural land to address this constraint.

23. Affordable Housing

This planning application has deferred until a later date details on the number, type and tenure of affordable housing. Thus, the Parish Council is unable to determine if it will satisfactorily address our locally identified housing needs.

24. Parish Plan Objectives for Future Development

Billingshurst Parish Council has taken a proactive stance on consultation with its electorate over their views on future development in the parish. The Parish Council consulted on the production of its Parish Plan in 2007 and 2008. The Parish Council asks parishioners to identify their top five mitigating factors required if the parish is forced to accept more development. The results of the consultation are given below:

Mitigating Factor	Percentage of Respondents
Local Police to have a base in Billingshurst, rather than working from Pulborough Police Station.	74.76%
Provide more parking in the village centre.	42.48%
New development should include a petrol station to service Billingshurst.	40.78%
Dedicated youth worker provision and facilities for young people.	34.95%
North-eastern bypass.	33.50%
Improved bus service.	26.21%
Provide a new supermarket.	24.03%
Should the development incorporate informal and formal open space, e.g. woodland walks and children’s play areas.	22.09%

Extension of the services provided at Billingshurst Surgery.	21.84%
Day care facilities required for older people.	21.36%
Affordable accommodation.	17.96%
Modernise the village centre.	17.72%
Should any new development incorporate designated footpath/cycle routes to encourage more sustainable travel to existing parts of the village?	17.48%
More parking required at Billingshurst Station.	17.48%
Lengthen the platform at Billingshurst Station.	12.38%
More business and industrial areas to provide local employment.	11.89%
The churchyard at St Mary's is full. Is there the need for a new burial ground in Billingshurst?	11.65%
Provide additional school places on the current school sites.	10.44%
Provide a new school within the new development.	10.19%
Accommodation suitable for the elderly.	8.74%

This application fails to address the Parish Plan objectives that are based on local knowledge and consultation.

25. Possible Community Facilities

The planning application includes land set aside for a three form entry school and doctor's surgery. If the land is not needed for these purposes, the Parish Council would not like it to be built on.

26. New Homes Bonus and Community Infrastructure Levy

The consortium of developers has talked about 'possible' infrastructure benefits but has given no firm facts and figures. There is no clear distinction made between infrastructure requirements necessary to enable the new houses to be occupied and those necessary to enable the successful integration of new and existing communities without an unreasonable strain on community facilities.

There has been no clarity over funding from the New Homes Bonus or the Community Infrastructure Levy.

The Parish Council will not consider future development in the parish without being in possession of the full facts and figures on infrastructure provision to make an informed decision. It is unreasonable to ask the local community to accept a development which clearly will put considerable strain on transportation, utilities and other community infrastructure without there being any certainty about the ability of the developers, utility companies or public agencies to fund the necessary investment programme.

Conclusion

Horsham District Council accepted, when it adopted the Core Strategy, that the expansion of Billingshurst was not justified in the plan period and endorsed a spatial strategy based on the expansion of Horsham and Crawley to achieve the most sustainable pattern of growth. The principles of both sustainable development and the spatial strategy remain just as relevant today.

Even in the face of the slow pace of development in the strategic locations, HDC should continue to apply these principles to the control of development. In doing so it should refuse planning permission for the eastward expansion of Billingshurst. In the event that there continues to be a shortfall in the 5-year supply of deliverable housing land in the short term, then it should not look beyond sites much closer to Horsham and Crawley where:

- journeys to work, school and community facilities can be contained within the close hinterland of these main towns
- a far greater percentage of journeys can be served by public transport than at Billingshurst
- the limited availability of public funds (and developer contributions) can be focused on investments that serve a far greater proportion of the district's population than would be the case in Billingshurst.
- the landscape character of development sites are much less intimate and vulnerable to harm from development.

In any event, the application fails to give any convincing assurances that its impact on local transportation, utility and community infrastructure can be adequately mitigated. The absence of the following information represents a fundamental omission.

- Details of a credible (fully-funded) investment programme.
- Details of the funding available for additional community infrastructure through the New Homes Bonus and Community Infrastructure Levy.

For these reasons, the Parish Council is unwilling to change its position of **vehement objection** to the further expansion of Billingshurst.

Yours faithfully

BILLINGSHURST PARISH COUNCIL

Beverley Bell PILCM
Parish Clerk

CC: Mr Ray Lee, Mr Gary Peck, Cllrs. A. Breacher, G. Lindsay, K. Rowbottom, Rt. Hon. Francis Maude MP

Appendix 1

Guide to Photographs of the Watercourse from the Bowling Alley
to the Barrel Drain in the High Street

Photo No.	Description
721	The pipe at the bottom of the Bowling alley opposite the Allotments, evidence of water flowing
722	Area to the right of the pipe. Shows extent of the growth of vegetation; just after this no water can be seen because of the vegetation growth
723	This shows the brickwork and pipe at the bottom of the Bowling Alley, next to the Allotment area. It is from this and across the road to the other ditch that the road floods in heavy rain
724	Slightly closer view of the same pipe
725	Overgrown ditch next to the Allotments in which surface water flows from the Bowling Alley to the two pipes. There was water in the ditch even though we have had many days of dry weather.
726	Walking up the Bowling Alley with the ditch on our left. The allotments can be seen through the trees and it looks as though there is no fence between.
727	Water can be seen in the ditch which is flowing from the land further up
728	The extent of the overgrown area around the ditch
729	There appear to be steps from the allotments down into the Bowling Alley and there were visible signs of mounds of dumped vegetation on the site as well as other detritus, some which would not degrade – paint tin
730	Opinion was that this is the site of an old pond
731	At the top of the Bowling Alley just before the fields on which the developers intend to build. There was water running downhill under what looked like flat paving slabs
732	Closer view of the slabs and the water running
733	Barbed wire and posts show the boundary just beyond the ditch
734	Area of “no-man’s land” with a further boundary fence a few yards over
735	View in the field once over the stile. From here it can clearly be seen that the field drainage would run down to the area at the top of the Bowling Alley
736	Walking into the field for a few yards there was a noticeable dip in the land
737	On closer examination it looks like a hole in the land or could even be a pond
738	Standing next to the “pond” the lie of the land can clearly be seen to run towards the top of the Bowling Alley to the area where the paved slabs were located
739	The area on the way back down the Bowling Alley, which also looked like a pond. Could see standing water but the vegetation was quite thick all around.
740	Back to the area just before Little East Street and the ditch runs behind Caffyns Rise, their rear fences shown on this picture
741	There was water clearly shown to be flowing in the ditch and just further on it enters at the side of No.24 Rosehill
743	Access to the ditch was gained from the back gate of No.24 Rosehill. To the left is a little bridge from one bank to the other. Water was running in the ditch.
744	To the right of the property the ditch is not so overgrown because it can be accessed from this property
745	The garden wall at 24 Rosehill which is the side of the ditch

746	This is the wall just along from No.24 moving towards Nos. 22,20,18 & 16
747	A little further along this shows the method of drainage from the gardens into the drainage ditch
748	Roots of trees, very large roots are acting as dams along the drainage ditch and the water was deeper in this location
749	The fence you can see is the back fence of a house in Caffyns Rise. It is clear that they have no access to this ditch for the purpose of “riparian” duties. A forest of trees is on the land to the left, some trees are huge and possibly with TPO’s
750	This shows where the tarmac at the back of the garage of No.22 has been undermined, possibly by water erosion and tree roots
751	Moving along the ditch with the retaining walls of the gardens of No.s 20,18,16 showing the drainage pipes from their gardens. The ditch is no more than two feet wide
752	Shows the ditch and the dense undergrowth to the left on the land which abuts Caffyns Rise. The ditch is very narrow and it would now be difficult to get any plant and machinery in here
753	At this point the water was a steady stream
754	Once again the huge tree roots are acting as dams, quite a lot of debris has accumulated, too. On the other side of this tree root the water was at least 20 inches deep
755	Water much deeper here than at the beginning of this length of ditch, probably because it is not as wide as further back, or even the land may be lower at this point
756	The water began to get less deep at this point and the brambles were difficult to get through as they are very dense
757	Pushed through the brambles and overgrowth but it was getting difficult to get through
758	Reached a few feet from the wall which although I couldn’t see, it was probably the start of the pipe under the road at Rosehill. Undergrowth was very dense at this point, all growing from the land behind Caffyn’s Rise
759	Dense growth in the area further on than the brickwork but impossible to get any further; water still in the ditch at this point
761	Brambles growing across the ditch from the left to the right, ivy and whippy tree branches too
762	On the way back to No.24, at the deepest part of the water; the girth of the tree root was probably a contributing factor
764	Standing on the steps of No.17 Rosehill, looking over the area where the pipe under the road comes out into an open ditch once again; part of the brick wall can be seen but it is so overgrown that no outlet can be seen
765	A closer view of the brickwork to the right just below the fence. This area is possibly part of the new outfall built as part of Bakers Meadow
767	To the right shows the back fences of Bakers Meadow – note there is no direct access from the gardens that you can see.
768	Through the arch at Rosehill to the area at the side of the garages and the final outlet of the ditch with metal grille. This area is possibly the deepest part of the ditch along its length
769	From here the water finally goes out to the barrel drain and comes out at Forge Way to Cedar Brook
770	The area at the side of the garage block where the wall has broken up and bricks are being displaced into the ditch

771	The other grille
772	The water flowing under the grille
773	The area of overgrown vegetation between the Rosehill garages and Bakers Meadow which has the ditch somewhere in it
775	This shows the distance between the area of the Rosehill garages and the fences of houses in Bakers Meadow
777	A resident trying to open the gate through which any maintenance to the ditch at this point should be carried out, as it is the only access for Bakers Meadow residents or maintenance company
778	The gate would only open a fraction and this was taken through the gate looking to the right
779	... and left
780	The frontage to Bakers Meadow
781	Resident in No. 4 Bakers Meadow allowed access to his garden, as is obvious there is not an access to the ditch from his property
782	Taken with permission from the resident's bedroom window. The close board fence visible further over are those of 13-15 Rosehill.
783	Looking back from the bedroom window toward No.17 Rosehill where we stood on their steps to take a photograph 764 of the dense vegetation between Bakers Meadow and Rosehill

- The whole area of the unnamed watercourse should be carefully looked at before any further planning permissions are given, if discharge of surface water to this watercourse is contemplated. There is already known to be flooding of the road at the bottom of the Bowling Alley.
- The existing ditch/culvert between Rosehill and Caffyns Rise should be a cause for concern – width of ditch, present state of ditch and access
- The final access point before the surface water flows under the High Street to the side of the garages in Rosehill and the deterioration of the wall needs to be looked at and dealt with; land slippage into ditch
- The area between Rosehill 15/13 backs onto the new development (Bakers Meadow) however, there is as shown in photographs no access to the ditch from these properties in Rosehill, it appears the maintenance of the ditch falls on the property owners in Bakers Meadow or any maintenance company that may have been part of the planning application agreement. However, judging by the over growth and undergrowth it is doubtful if any maintenance can have been done, as the access through the gate is so overgrown as to be impossible.
- Photograph from the original Bakers Meadow planning application show how the area was before planning permission was granted in 2005 **DC/05/0642** – photographs on HDC public access.