

# **Regulation 18 Horsham District Local Plan 2019- 2036**

## **Housing Growth, Distribution and Potential Housing Allocations**

**Representation on behalf of  
Billingshurst Parish Council**

**Tony Fullwood Associates**

**Chartered Town Planners**



## Strategic Policy 14 - Options for Housing Growth

### Objection to Part 1 of the policy (above)

The first part of Strategic Policy 14 states:

*The Local Plan will make provision for a significant number of homes and associated infrastructure within the period 2019-2036. The options for overall housing growth being tested as part of the preparation of the Local Plan are:*

- 1. 1,000 homes per year, to meet the objectively assessed local housing need;*
- 2. 1,200 homes per year, to meet the local housing need and also meet some of the unmet housing need in neighbouring authorities;*
- 3. 1,400 homes per year, to meet the local housing need and make significant inroads into the unmet housing need in neighbouring authorities...*

### Option 1

The Parish Council objects to Option 1 which proposes an additional 17,370 dwellings in Horsham District over the plan period as it is not an appropriate strategy for the area taking into account the evidence, nor consistent with national policy.

Applying the Government's Standard Method, Horsham District has a minimum local housing need' of 965 homes per year. To this, the District Council has applied an additional 5% buffer to ensure choice and competition in the market for the whole of the plan period. Using this approach, the Local Plan states that the resultant minimum housing requirement is 17,370 additional dwellings in the period between 2019 and 2036 (just over 1,000 dwellings per annum).

The District Council has applied a 5% buffer to the whole of the Plan period although the NPPF (Paras 67, 73 and 74) indicates that the 5% buffer is related to the 5 year land supply. NPPG Housing and economic needs assessment makes no mention of a buffer. It can be argued therefore that the 5% buffer should only be applied to the first 5 years of the plan period.

It should be noted that the Draft Crawley Borough Local Plan 2020 – 2035, June 2019, states in relation to Strategic Policy H2: Key Housing Sites:

*This Policy demonstrates how the Local Plan makes provision for the delivery of a minimum of 5,355 net additional dwellings in the borough between 2020 and 2035. **This includes the 5% additional buffer required within the first five years of the Plan** to ensure greater competition and choice in the supply of housing land (**my emphasis**).(Para 12.33).*

If the Horsham Local Plan followed the methodology advocated by Government and applied a 5% buffer to the first five years of the plan period rather than the entire period, the minimum housing requirement for the District would be reduced to 16,645 dwellings (979 dwellings per annum). This reduction of 725 dwellings is significant in that it would save the equivalent of approximately 24ha of greenfield land from unnecessary development.

## Options 2 and 3

Billingshurst Parish Council strongly objects to Options 2 and 3 for higher housing growth as it is not an appropriate strategy for the area taking into account the evidence and the reasonable alternative of lower housing provision which still meets the minimum local housing need but without the same impacts on the environment.

The Parish Council objects to Options 2 and 3 for the following reasons:

### *The Government's Standard Method for calculating housing need and the impact of Crawley*

Analysis of the contributors to population change in Horsham District over the period 2001 to 2017 shows that growth was largely driven by internal migration – i.e. people moving to the district from other parts of the United Kingdom. Thus the district has absorbed overspill from London, Crawley and other locations within the UK (Para 5.20). In Crawley, population growth has more strongly been driven by natural change and typically sees a notable level of international migration and net out-migration to other parts of the Country (Para 5.21).

It is clear from the North West Sussex Strategic Housing Market Assessment, Nov 2019, that the requirement for additional dwellings in Horsham district stems from applying the Government's Standard Method for calculating housing need. This Method for calculating housing need uses 2014 – based projections. This gives a projected population growth for Crawley between 2019 and 2029 of 19,029. However, if the 2016 – based population growth were used, this produces a population increase of only 9,246 (Table 12 from the North West Sussex Strategic Housing Market Assessment, Nov 2019). Clearly this would result in a housing need of approximately half that derived from the 2014 – based calculations. The comparison between 2014- and 2016-based projections is important as the 2014-based figures drive the Standard Method currently required by the Government and yet the 2016-based data is more up-to-date and is based on the same methodology.

The emerging Crawley Borough Local Plan 2020 – 2035 shows a total requirement of 11,280 dwellings over the plan period based on the Standard Method. Strategic Policy H1: Housing Provision states that the emerging Local Plan makes provision for the development of a minimum of 5,355 net dwellings in the borough in the period 2020 to 2035. This leaves an unmet housing need of approximately 5,925 dwellings which the Plan indicates will need to be met outside the Borough boundaries including continued assessment of potential urban extensions to Crawley. Clearly, if the 2016 – based population growth were to be used, Crawley's housing need would be approximately halved – allowing it to meet all of its needs up to 2035 within its boundaries. Any expansion of Crawley would therefore be seen as meeting Horsham's housing needs – not those of Crawley.

Clearly, given the Duty to Cooperate with adjoining local planning authorities who are unable to meet their housing need within their area, the implications of the level of population growth in Crawley on Horsham and Parishes such as Billingshurst are significant.

The North West Sussex Strategic Housing Market Assessment, Nov 2019 clearly states that the local housing need calculations may need to be updated in due course prior to the submission of local plans to take account of future data releases. New affordability ratio data for 2019 is due to be published in March 2020. New household projections are due to be released in Summer 2020, and the Government has indicated that it may change or amend

the standard method in due course to take account of the implications of these new projections (Para 5.16).

In any event, policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary in accordance with the NPPF. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. (Para 33). This should allow Horsham District to follow a cautious approach to housing growth at this stage – with the opportunity to adjust as necessary in future local plan reviews.

### *Impact on sustainability*

It is important to note that the Sustainability Appraisal concludes that the higher housing growth options have a more significant benefit on the provision of housing although the lower growth option still has a positive impact on housing provision and indeed meets the local need. In general, however, it states that providing a higher level of growth over the plan period would require a higher amount of greenfield land take, which could have a range of environmental impacts. The delivery of a higher amount of growth could also place more development in closer proximity to sensitive environmental receptors, higher value landscapes and heritage assets. It is also expected that an approach which includes a higher amount of development would significantly increase the number of private vehicle journeys being made regularly, which is likely to be to the detriment of air quality and the District's contribution to climate change. This makes the selection of the lower growth option a highly sustainable approach for the District.

### **How should the Reg 18 Local Plan be changed?**

In relation to Option 1, the Parish Council seeks compliance with Government advice in the application of the 5% buffer and a reduction in the target of 725 dwellings.

The Parish Council also urges the emerging Crawley and Horsham Local Plans to await publication of up to date projections which could well signal reduced local housing need. A global recession, exiting of the European Union and impacts of the Government's international migration policies may be taken into account by Government in new projections and, as seen above, have considerable effect on the Crawley housing need with significantly reduced pressure on Horsham District. In the meantime, the Horsham District Plan should use the Lowest Growth option of 979 dwellings per annum (16,645 dwellings total) as a working assumption in preparing the Local Plan. This would fully address the housing need in Horsham District of 935dpa together with the 5% buffer for the first five years.

Options 2 and 3 should be deleted from Strategic Policy 14.

## **Strategic Policy 14 - Options for Housing Growth**

### **Objection to Part 2 of the policy (above)**

The second part of this policy includes the following contributing elements towards housing growth:

- a) Homes that are already permitted or agreed for release, including previously allocated strategic sites at Land North of Horsham (2,750) and Land West of Southwater (600), Land at Kilnwood Vale (2,500) and Land South of Billingshurst (150).*
- b) Housing completions (which will be known at the time the Local Plan is submitted);*
- c) Allocation of large Strategic Sites that provide 800 homes or more*
- d) Smaller Scale allocations to be allocated in this Local Plan or in Neighbourhood Plans and*
- e) Windfall units, including 10% provision on land less than 1ha.*

This part of the policy indicates that there are already a number of commitments in Horsham district which will contribute to the local housing need. For example, homes already permitted or agreed for release (category a in the policy) are shown to contribute 6,000 dwellings towards the housing need. Category b) of the policy is likely to involve completions from at least one monitoring year (2019/20). In relation to category e) of the policy, smaller scale windfall sites are likely to contribute a significant number to the total across the district after the first 3 years of the plan period (when existing planning permissions will continue to be implemented). In addition, larger scale windfall sites should be counted towards the mid to latter part of the plan period as, whilst every effort will have been made to identify and allocate suitable larger sites, this is based on current known land owners' intentions and it is difficult to capture all such intentions for the medium/long term. Explicit reference should be made to large and small scale windfalls in category e) of the policy.

A further category which will contribute towards local housing need has been omitted from the policy: outstanding planning permissions on sites other than those included in category a).

The Parish Council object to the second part of Strategic Policy 14 due to the absence of outstanding planning permissions other than those included in a) and the absence of explicit reference to large and small scale windfalls in e). The policy is not based on appropriate evidence and is therefore not justified.

### **How should the Reg 18 Local Plan be changed?**

Strategic Policy 14 should include outstanding planning permissions on sites other than those included in a) and explicit reference to large and small scale windfall contributions in e).

## Omission of Policy

### Housing Distribution

Billingshurst Parish Council strongly objects to the strategic growth directed towards Billingshurst in the Reg 18 Local Plan. The Reg 18 Local Plan signals two strategic extensions to the east and west of the village totalling 2,550 - 2950 dwellings together with a new town of a further 3,500 - 4000 dwellings approximately 1.5km to the south with significant and cumulative impacts on the village (as set out in the site-specific objection). Thus a total of over 6000 dwellings are proposed at or adjoining Billingshurst in the plan period.

It is very unfortunate that the Regulation 18 Local Plan does not include a clear evaluation of the recent contribution each settlement such as Billingshurst has made to housing provision during the adopted Local Plan period (2011 onwards) or their current housing commitments (such as planning permissions etc).

Having established a local housing need for the district, it would also have been extremely helpful in considering the distribution of development options for the Reg 18 Local Plan to include the net requirement for additional dwellings after subtracting the existing commitments (such as the 6,000 dwellings already permitted or agreed for release on strategic sites at Land North of Horsham, Land West of Southwater, Land at Kilnwood Vale and Land South of Billingshurst. In broad terms, if the local housing need is 16,000 dwellings and the commitments are already expected to contribute 8,000 dwellings, the Local Plan is only seeking additional sites to accommodate 8,000 dwellings. This would have given a much clearer context for the number and scale of strategic site requirements.

There is no clear policy which directs strategic growth to the most sustainable locations within the Reg 18 Local Plan. Rather there is a reliance on a combination of Strategic Policy 2 (which sets out a development hierarchy for small scale infill development) and Strategic Policy 3 on Settlement Expansion (which is a general policy about settlement expansion and is not spatially specific). Even combining these two policies does not give a clear spatial indication concerning the most sustainable location for strategic- and local-scale development.

Strategic Policy 2 includes the hierarchy of towns/ villages and shows Horsham as the Main Town with a large range of employment, services and facilities and leisure opportunities, including those providing a district function with strong social networks, good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements.

Billingshurst is classified with 9 other settlements as a Small Town/ Larger Village. These are settlements which the Local Plan states:

*...have 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.*

As it is outside the plan area, Crawley is absent from the settlement hierarchy but is clearly a large sustainable town with a major influence on the Horsham Local Plan area. It is important to note that the North West Sussex Strategic Housing Market Assessment, Nov 2019, states that similar to Horsham Town, most buyers within the Horsham Rural area (which includes Billingshurst) are commuters to nearby employment locations as well as Central London (Para 6.39). Given that most of the housing demand in Horsham district is from those commuting to work outside the district, the most sustainable strategy must be to focus the most significant portion of development close to the largest settlements with the widest range of facilities and services and significant employment opportunities. This includes Crawley where such development would meet the needs of Horsham District whilst being located close to the most sustainable settlement.

Thus, the most appropriate strategy would be to focus strategic-scale development at Crawley and Horsham, with local-scale development focused on the 10 small towns/ larger villages.

Excluding new settlements, the distribution of housing options included in the Reg 18 Local Plan currently focuses development as follows:

<b>Settlement</b>	<b>Dwellings</b>
Crawley strategic growth	10,000
<i>Main Town</i>	
Horsham strategic growth	900 – 1,000
<i>Small Towns/ Larger Villages</i>	
Billingshurst strategic growth (excluding Adversane new town of 3,500 – 4000 dwellings)	2,550 – 2,950
Bramber	
Broadbridge Heath	100 - 150
Henfield	350
Partridge Green	200
Pulborough and Codmore Hill	275
Southwater strategic growth	1,200
Steyning	50
Storrington & Sullington	100
Upper Beeding	70

Within the Small Towns/ Larger Villages category, the distribution of strategic sites is heavily focused on Billingshurst with a significantly disproportionate number of additional potential allocations compared with Horsham and other Small Towns/ Larger Villages<sup>1</sup>. At the 2011 Census, 3,945 households lived in Billingshurst. Without the adjoining new town at Adversane, Billingshurst the Reg 18 Local Plan expects Billingshurst to double in size during the plan period. With the new town it is expected to treble in size. The level of expansion at the small town/ larger village of Billingshurst with or without the adjoining new town is simply not appropriate to the scale and function of the larger village of Billingshurst and thus the strategic allocations at Billingshurst would singly or cumulatively not comply with Reg 18 Local Plan Strategic Policy 3 (criterion 2).

<sup>1</sup> Southwater has already committed to strategic growth through their Neighbourhood Plan.

Billingshurst has recently grown significantly in the period 2011 – 2019.

Billingshurst already has the capacity to accommodate local-scale growth during the remainder of the Local Plan period to 2036 as shown in the table below:

<b>Source</b>	<b>Dwellings</b>
Planning permissions on small sites (1 – 4 units) <sup>2</sup>	31
Detailed planning permissions on large sites (5+ dwellings) and outline planning permission on sites less than 10 dwellings <sup>3</sup>	463
Small brownfield sites within the built up area boundary <sup>4</sup>	30
Windfalls 2019 - 2036 <sup>5</sup>	96
<b>Total</b>	<b>620</b>

Whilst Billingshurst has a range of services and facilities and local employment provision, there is limited capacity for some of these services to meet the existing local-scale capacity of 620 dwellings without the major demands from the proposed additional strategic allocations of 2,550 – 2,950 dwellings together with the cumulative impact from the proposed Adversane new town of a further 3,500 – 4000 dwellings. It is not practical to significantly expand the village centre, roads, parking, rail services, the rail station and its associated parking and other facilities to accommodate such scales of growth.

The proposed strategic growth at Billingshurst would significantly exceed the identified local housing needs and/or employment needs of the settlement and therefore would not comply with Strategic Policy 3 (criterion 3).

Finally, the proposed strategic development to the West of Billingshurst would breach the existing recognisable and defensible boundary of the A29 and would not therefore comply with Reg 18 Local Plan Strategic Policy 3 (criterion 5).

In summary, the Parish Council strongly objects to the strategic level of development targeted at Billingshurst which is disproportionate and inappropriate in relation to

- recent growth of the settlement
- local housing need
- current local-scale housing capacity
- the scale and function of the settlement type
- infrastructure capacity, including the village centre
- development is not contained within an existing defensible boundary

The major strategic growth at Billingshurst is clearly not an appropriate strategy for the area, taking into account the reasonable alternatives, and based on proportionate evidence and is therefore not justified.

---

<sup>2</sup> 2019 Annual Monitoring Report

<sup>3</sup> 2019 Annual Monitoring Report. This figure excludes outline planning permissions on site of 10+ dwellings

<sup>4</sup> Sites SA030; SA032 - SHELAA Housing Land Report, Billingshurst, 2018

<sup>5</sup> 16 years @ 6dpa – excluding years 1- 3 to avoid double counting planning permissions



### **How should the Reg 18 Local Plan be changed?**

The strategic allocations (West and East of Billingshurst) and the proposed Adversane new town should be deleted from the Local Plan.

It is the Parish Council's preference to provide new housing to serve the needs of Billingshurst not through the creation of enormous strategic extensions to the village or a new settlement at Adversane but through the promotion of brownfield sites within the defined built up area and local-scale greenfield sites abutting the built up area boundary.

The Parish Council urge Horsham District Council and to work with them as part of an early review of the Billingshurst Neighbourhood Plan to jointly evolve an alternative strategy of a number of smaller scale allocations selected from the SHELAA, 2018.

Finally, the Parish Council seek a clear policy within the Local Plan which directs appropriate levels of growth to the most sustainable locations.

## Potential Housing Allocations

### Objection to Land West of Billingshurst

The site is included within the Site Assessment Report, 2020, as a potential large scale site for allocation for housing development of 800+ dwellings.

The Local Plan states:

*A number of parcels of land have been promoted for development to the west of Billingshurst. To the north, land is promoted for around 850 to 1000 dwellings. Land to the south has been identified for around 500 -750 homes.*

Nevertheless, a site immediately to the south of this proposed strategic allocation (SA409) is not identified as a potential housing allocation site within the Site Assessment Report, 2020.

Of site SA409, the Site Assessment Report, 2020 concludes:

*The site lies adjacent to land also promoted for development (SA744 and SA642), but has not been promoted as part of the wider strategic development west of Billingshurst.*

*The site lies within the countryside west of, and divided by, the A29 and a narrow field strip from the built up area boundary of Billingshurst... It is rural in nature, comprising of agricultural fields which gently slope down towards the south. The site lies within the Bat Sustainance Zone which means feeding habitats for bats need to be retained and has public rights of way running through the site... The potential of this site for development is considered to be hindered by its separation from the village of Billingshurst by the A29, notwithstanding the public rights of way from the north, middle and south of the site to the village....*

The Parish Council agrees with the conclusion for Site SA409 included in the Site Assessment Report, 2020, which states that the combined RAG Rating is *Very Negative Impacts (unlikely to be mitigated)* and that the site should not be identified for housing development. The Parish Council considers that the arguments applied to SA409 apply equally to the potential strategic allocation on Land West of Billingshurst. Indeed, there appears to be some inconsistency in the approach to the potential strategic allocation and the area considered unsuitable for development despite being in a comparable location and comprising very similar landscape, biodiversity, archaeology/ heritage etc.

### Impact on Landscape

The capacity of this potential allocation is stated in the Reg 18 Local Plan as 1350 – 1,750 dwellings (excluding the Platts Roundabout 'island' site). This is classified as Large Scale Housing Development within the Landscape Capacity Study, 2020 (Para 2.6). Indeed, even the two sites which make up this proposal would, individually, classify as Large Scale Housing Development. It should be noted that the Landscape Capacity Study does not even assess the western extent of the proposed strategic allocation – so extensive is the area now proposed for development that it even exceeds the areas contemplated in the Landscape Capacity Study.

The Landscape Capacity Study, 2020 sets part of the potential northern site within Local Landscape Character Area 51: Land North West of Billingshurst and the remainder of the site within Local Landscape Character Area 52: Land West of Billingshurst.

The Study concludes that both areas have only Low – Moderate capacity to accommodate large scale development even once mitigation is taken into account (Para 2.8). The Study explains that this means:

*The area only has potential to be able to accommodate development in limited locations without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation*

The site south of the A272 would be separated from Billingshurst by the A29 and two fields, creating a development in open countryside which does not abut the village boundary. Extensive development on this site would appear as a rather remote intrusion into this attractive landscape.

Land West of Billingshurst is an extensive area and, according to the District Council's own landscape evidence large scale housing development such as that proposed would have unacceptable adverse landscape and visual impacts even taking into account any mitigation measures.

In summarising the potential allocation's site suitability the Reg 18 Local Plan states *Although not designated as being of landscape importance, the landscape in this area is attractive and undulating. Although geographically close to Billingshurst, its separation from the village by the A272 limits its relationship with the existing built form, and this relative isolation contributes to the very strong rural character in this area...it is considered that the impact would be particularly high given the existing character and quality of the landscape.*

The landscape impact for this proposed large scale housing development shown in the Local Plan's Site Suitability Assessment is clearly incorrect based on the District Council's own evidence and therefore must be changed to Very Negative Impacts.

The proposed site is rural in character and the presence of the A29 limits the relationship of this landscape with the existing built form. The A29 severs the proposed site from the existing built up area and provides a recognisable and defensible boundary to large scale development. It is accepted that the small scale Platts Roundabout 'island' site already has consent for a petrol filling station, garage and convenience store and outline planning permission for flexible employment space (B1b/B1c/B2/B8). However, this site is small scale, sits within the junction of two A roads and would have a limited and contained impact on the landscape. Conversely, the proposed strategic development to the West of Billingshurst would significantly breach the existing recognisable and defensible boundary of the A29 and would not therefore comply with Reg 18 Local Plan Strategic Policy 3 (criterion 5).

## **Biodiversity**

In terms of biodiversity, the Local Plan already states:

*The site promoter of the northern half of the land west of Billingshurst has committed to providing biodiversity net gain, but this is not the case for all promoters of land in this area. It is noted that the river Arun is a Site of Special Scientific Interest (SSSI), and further*

*information is required to understand how damage to the quality of this habitat would be prevented because of the increased level and proximity of any development. The proposed site is also located in known flight paths of the Barbastelle bat, a protected species that roosts at the nearby Mens Woodland. This is designated as a Special Area of Conservation and is of international importance. Further work to understand the impact of this site on this protected species is required.*

There will clearly be an impact on the biodiversity of this extensive site and adjoining designated areas as well as protected species and the promoter of the southern portion of the site has not committed to net biodiversity gain. Under these circumstances it is not possible to conclude that the impact on biodiversity will be 'neutral' as shown in the Local Plan's Site Suitability Assessment.

### **Flooding/ Drainage**

The Local Plan already states:

*Although the site adjoins the river Arun, this area is not identified for development. Further work is however necessary to ensure no further risks are generated as a result of any development either on or offsite.*

With the impact of development currently unknown, it is not possible to evaluate the flooding impact as 'neutral' as shown in the Local Plan's Site Suitability Assessment.

### **Community Infrastructure (eg education, health, leisure)**

Despite assertions from developers, it is currently unclear whether promised community infrastructure is viable alongside affordable housing provision, transport infrastructure, landscape mitigation measures, high quality designs and materials and other planning requirements.

These separate sites which comprise this proposed strategic allocation are promoted by separate landowners/ developers without a coordinated approach to supporting community infrastructure.

For these reasons, it is not reasonable at this stage to assume that infrastructure promises will be delivered.

### **Transport**

The Parish Council contend that the arguments made by the District Council against Site SA409 apply to the proposed strategic allocation west of Billingshurst:

*The potential of this site for development is considered to be hindered by its separation from the village of Billingshurst by the A29, notwithstanding the public rights of way from the north, middle and south of the site to the village.*

Traffic generation from 1350 – 1,750 dwellings (excluding the Platts Roundabout site) would have a significant impact on Billingshurst. It would be necessary for pedestrians and cyclists to cross one or two A roads to access the village from this potential development site and, for this reason, it is likely to encourage more car-borne trips.

The southern site would be severed from Billingshurst by the A29 and two fields.

The distance from the western and southern parts of the proposed site to the village centre and services would be likely to encourage more car-borne trips.

The opportunities for sustainable transport options from this location are severely constrained by the existing road network.

Traffic generation from 1350 – 1,750 dwellings (excluding the Platts Roundabout site) would have a significant impact on traffic congestion, air quality and climate change. The A272 narrows across a Grade 2 listed bridge and would need to be widened to serve the proposed site in order to accommodate passing buses and larger vehicles.

The transport impact for this proposed large scale housing development shown in the Local Plan's Site Suitability Assessment is clearly not 'neutral' and should be changed to Very Negative Impacts unless there is conclusive traffic modelling, impact assessments and feasible/viable solutions to conclusively demonstrate otherwise.

### **Piecemeal Development**

Despite the fact that three sites are identified as part of a comprehensive strategic development west of Billingshurst, the area is promoted by three separate landowners as three separate schemes. With the exception of the small scale and contained Platts roundabout 'island' site, which, in large part, already has planning permission, development of the remaining large scale sites has the potential to bring forward a disjointed scheme which does not provide a comprehensive approach to landscape, biodiversity, transport, community infrastructure, flooding, affordable housing or design quality with a clear sense of place. In that sense, this option does not represent a comprehensive strategic development option for the Local Plan. For this reason alone, it should be rejected.

### **Conclusion**

As set out in other objections, this proposal represents large scale strategic housing development to which Billingshurst Parish Council strongly reject as disproportionate and inappropriate in relation to:

- recent growth of the settlement
- local housing need
- current local-scale housing capacity
- the scale and function of the settlement type
- infrastructure capacity, including the village centre
- development not being contained within an existing defensible boundary

In addition, due to the impacts of such an extensive development on the landscape, biodiversity, drainage/flooding, community infrastructure and transport as set out above, Billingshurst Parish Council strongly object to land West of Billingshurst as a strategic housing allocation.

Whilst the extensive sites may have been promoted by developers/ landowners, their availability does not mean that such a scale of development is an appropriate strategy for Billingshurst or the Plan area, taking into account the reasonable alternatives, and based on proportionate evidence.

### **How should the Reg 18 Local Plan be changed?**

It is the Parish Council's preference to provide new housing to serve the needs of Billingshurst not through the creation of enormous strategic extensions to the village or a new settlement at Adversane but through the promotion of brownfield sites within the defined built up area and local-scale greenfield sites abutting the built up area boundary. With the exception of the Platt's roundabout 'island' site which already has the benefit of planning permission, the large scale field pattern to the west of the A29 means that there are no opportunities for local-scale greenfield sites to the west of Billingshurst.

The Parish Council urge Horsham District Council to reject the proposed strategic extensions to Billingshurst of 1000+ dwellings and to work with them as part of an early review of the Billingshurst Neighbourhood Plan to jointly evolve an alternative strategy of a number of smaller scale allocations selected from the SHELAA, 2018.

The Sustainability Appraisal should be updated to take into account the issues raised in this objection.

## **Land East of Billingshurst**

### **Objection to Land East of Billingshurst**

The site is included within the Site Assessment Report, 2020, as a potential large scale site for allocation for housing development of 800+ dwellings.

The Local Plan states

*Land at this site has been proposed for up to 1,200 units as an urban extension of Billingshurst. The site promoters have indicated that the site could come forward in two phases-up to 800 north of the railway line and a further 400 to the south.*

### **Landscape**

The capacity of this potential strategic allocation is stated in the Reg 18 Local Plan as up to 1,200 units with up to 800 north of the railway line and a further 400 to the south. This is classified as Large Scale Housing Development within the Landscape Capacity Study, 2020 (Para 2.6). Indeed, the area to the north of the railway line alone would represent Large Scale Housing Development according to the Study. The Landscape Capacity Study, 2020 sets the area to the south of the railway line within Local Landscape Character Area 47: Land to the South East of Billingshurst. The area to the north of the railway line comprises almost the entirety of Local Landscape Character Area 48: Land East of Billingshurst.

The Landscape Capacity Study concludes that Land to the South East of Billingshurst has No/Low capacity to accommodate large or even medium scale development once mitigation is taken into account (Para 2.8). The Study explains that this means:

*The area is unable or only has very limited potential to be able to accommodate the specified type and scale of development without unacceptable adverse landscape and visual effects or compromising the values attached to it, taking account of any appropriate mitigation.*

The area south of the railway line should be firmly excluded from consideration as a strategic development site on landscape grounds, in accordance with the District Council's own evidence.

The Study concludes that Land East of Billingshurst to the north of the railway line has Moderate capacity to accommodate large scale development once mitigation is taken into account (Para 2.8). The Study explains that this means:

*This area has an ability to accommodate development in some parts without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation. There is a need for each proposal to be considered on its individual merits to ensure there are no unacceptable adverse impacts*

Land north of the railway line is an extensive area with a stated capacity for 800 dwellings. Nevertheless, according to the District Council's own evidence the area has capacity to accommodate large scale development only in some parts without unacceptable adverse landscape and visual impacts.

Whilst the character of the area to the north of the proposed strategic extension is changing because of the housing development currently under construction, the eventual developed area extends the existing built up boundary eastwards in a much more limited way than the proposed strategic housing allocation and cannot therefore be used as precedence for such an extensive area. Indeed, open space and sports fields are proposed in the south eastern extremity of the housing development currently under construction to avoid the built form projecting further into the countryside.

The 'neutral' landscape impact for this proposed large scale housing development shown in the Local Plan's Site Suitability Assessment is clearly incorrect based on the District Council's own evidence and therefore must be changed.

### **Biodiversity**

In terms of biodiversity, the Local Plan already states:

*The site promoter has not committed to providing biodiversity net gain, although they have indicated that existing key habitats and ancient woodland, including the Local Wildlife Site at Wilden's Meadow would continue to be protected. Further work to understand the impact of this site on the Barbastelle bat will be required. This is a protected species and roosts in the nearby Mens Woodland, which is designated as a Special Area of Conservation and is of international importance.*

There will clearly be an impact on the biodiversity of this extensive site and adjoining designated areas as well as protected species and the promoter of the site has not committed to net biodiversity gain.

### **Flooding/ Drainage**

The Local Plan already states:

*The land is not identified as being at specific risk from flooding, although any development that comes forward will need to ensure that no further risks are generated as a result of the development either on or offsite.*

There are records of flooding in the area with concerns raised by existing residents. The existing trees, extensive hedgerows and the fields throughout the proposed site make an important contribution towards flood prevention in East Billingshurst.

Penny Brook and Cedar Brook are part of the catchment area of the Par Brook, which is of vital importance to the surface water drainage of East Billingshurst.

In 2015 the Environment Agency provided CCTV footage of the three culverts which showed capacity concerns. In February 2015 written confirmation was received from the Environment Agency. It stated that the designer of the Billingshurst flood alleviation scheme in 1982 - after the flooding of 1981 – felt; "that it was coming to the end of its lifespan and consideration for development above the scheme needs to be addressed and considered".

The fields of the proposed site have clay sub-soils which naturally act as water meadows that help to protect against flooding elsewhere. If this extensive site was to be developed using the existing ditches to dispose of attenuated water, areas downstream of the ditches



are in danger of flooding. When culverts surcharge, areas upstream may also find that they flood.

Flooding has previously been recorded at a pinch point in the area of the Southern Rail culvert under the railway where floodwater has flooded property and commercial businesses in Daux Road and been very close to flooding the rail track.

With the proposed development of this site and the fields unable to act as water meadows, the likelihood of flooding reaching properties and the railway line with the resultant inevitable major disruption is significantly increased.

With the impact of this proposed extensive development likely to have some adverse consequences on local drainage and flooding, it is not possible to evaluate the flooding impact as 'neutral' as shown in the Local Plan's Site Suitability Assessment.

### **Community Infrastructure (eg education, health, leisure)**

Despite assertions from developers, it is currently unclear whether promised community infrastructure is viable alongside affordable housing provision, transport infrastructure, open space, landscape mitigation measures, high quality designs and materials and other planning requirements. For this reason, it is not reasonable at this stage to assume that infrastructure promises will be delivered.

The portion of the site south of the railway line is isolated from the land to the north and this would be likely to lead to a fragmented and disjointed provision of community infrastructure.

### **Transport**

Traffic generation from 1,200 dwellings would have a significant impact on the A272 and local roads connecting to the village centre and other services, including Broomfield Drive, Brookers Road, Daux Avenue and Daux Road. The proximity to the railway bridge and issues of road safety are identified as concerns in the Local Plan. A proposed access linking the A272 through the site to the village centre could create a 'rat run' from the A272 into and through the village and may erode the benefits of the new spine road that is designed to route through traffic around Billingshurst.

The distance from the central and eastern parts of the proposed site to the village centre and in particular would be likely to encourage more car-borne trips with consequent impacts on traffic congestion, air quality and climate change. The southern site would be severed from the northern site by the railway line.

The transport impact for this proposed large scale housing development shown in the Local Plan's Site Suitability Assessment is clearly not 'neutral' and should be changed to Very Negative Impacts unless there is conclusive traffic modelling, impact assessments and feasible/viable sustainable transport solutions to conclusively demonstrate otherwise.

### **Piecemeal Development**

The Local Plan accepts that

*The portion of the site south of the railway line is somewhat isolated from the land to the north and from the existing settlement: this may limit community cohesion in this section of the development.*

The large scale sites north and south of the railway line may emerge as a disjointed scheme which does not provide a comprehensive approach to landscape, biodiversity, transport, community infrastructure, flooding, affordable housing or design quality with a clear sense of place. In that sense, this option does not represent a comprehensive strategic development option for the Local Plan. For this reason, it should be rejected.

### **Loss of Informal recreation provision**

The Local Plan Site Assessment states:

*The development of this location could potentially lead to the loss of informal recreation land, although it is recognised open space provision would be incorporated into the proposals.*

The neighbourhoods to the west of the proposed strategic development could be significantly distanced from access to the countryside by this proposed extensive development. The nearest available alternative site, Jubilee Fields, is distant and requires crossing a bridge over the A29. This would represent a significant loss to the amenity of these areas.

### **Conclusion**

As set out in other objections, this proposal represents large scale strategic housing development which Billingshurst Parish Council strongly rejects as disproportionate and inappropriate in relation to:

- recent growth of the settlement
- local housing need
- current local-scale housing capacity
- the scale and function of the settlement type
- infrastructure capacity, including the village centre
- development not being contained within an existing defensible boundary

Whilst the extensive sites may have been promoted by developers/ landowners, their availability does not mean that such a scale of development is an appropriate strategy for Billingshurst or the Plan area, taking into account the reasonable alternatives, and based on proportionate evidence.

In addition, due to the impacts of such extensive development on the landscape, biodiversity, drainage/flooding, community infrastructure, transport and informal recreation provision set out above, Billingshurst Parish Council strongly object to land East of Billingshurst as a strategic housing allocation.

### **How should the Reg 18 Local Plan be changed?**

The area south of the railway line is already considered by the District Council's Site Suitability Assessment as *somewhat isolated from the land to the north and from the existing settlement*. It is also included by developers as a potential second phase of development. In accordance with the District Council's own evidence, this area south of the railway line should be firmly excluded from consideration as a strategic development site on landscape grounds.

The extensive area to the north of the railway line should also be deleted as a strategic housing allocation with a capacity for 800 dwellings.

It is the Parish Council's preference to provide new housing to serve the needs of Billingshurst not through the creation of enormous strategic extensions to the village or a new settlement at Adversane but through the promotion of brownfield sites within the defined built up area and local-scale greenfield sites abutting the built up area boundary.

The Parish Council urge Horsham District Council to reject the proposed strategic extensions to Billingshurst of 1000+ dwellings and to work with them as part of an early review of the Billingshurst Neighbourhood Plan to jointly evolve an alternative strategy of a number of smaller scale allocations selected from the SHELAA, 2018.

The Sustainability Appraisal should be updated to take into account the issues raised in this objection.

## **Objection to new settlement at Adversane**

The Local Plan states:

*Land at this site has been proposed as a strategic scale allocation for around 3,500 to 4000 units, of which approximately 2,000 could be delivered in the Plan period to 2036. T*

### **Impact on Billingshurst**

*Community Infrastructure (eg education, health, leisure)*

The Local Plan states:

*Further work is required to understand in more detail how the educational needs arising from this new development could be met, although it is recognised that this will to some extent depend on feedback from West Sussex County Council (WSSCC). The potential of this location to deliver district-wide leisure requirements is not yet known, and further work to understand this wider offer will be required.*

Despite assertions from developers, it is currently unclear whether promised community infrastructure is viable alongside affordable housing provision, transport infrastructure, public transport, waste water treatment works, open space, landscape mitigation measures, high quality designs and materials and other planning requirements.

It is also unclear whether the settlement will reach a critical mass to require on site community provision or whether these services would need to be provided in other settlements. How the need for services arising from the proposed new town such as adult education, youth facilities, library provision, family and social care services as well as primary health services (e.g. GPs) and the emergency services would be met will depend to a significant degree on the particular strategic model of provision of each public service and whether this necessitates a requirement for space at the proposed new town or not. It is likely that a number of these services such as secondary schools, libraries, family and social care services will be centred on established centres such as Billingshurst and Horsham generating additional journeys outside the new town and placing a significant pressure on existing resources.

In relation to some facilities such as shops and primary health services (e.g. GPs) it will be commercial decisions which determine whether the service will locate within the new town or not.

There is normally a threshold of population before the need for certain community infrastructure is triggered. This causes a lag in provision of facilities until a critical mass of dwellings has been reached. Thus, even if providers decide to provide their services in the proposed new town, there is likely to be pressure on services in the short to medium term in adjoining settlements such as Billingshurst where some services are already at capacity. This would be exacerbated if either or both proposed strategic extensions to Billingshurst added pressure from a further 2,550 – 2,950 dwellings.

For these reasons, it is not reasonable at this stage to assume that all the infrastructure promises will be delivered on site at the new town and that the community will ultimately be self sufficient in relation to community services.

### *Vitality and viability of Billingshurst centre*

There are two potential consequences of superimposing a new settlement on the existing settlement hierarchy.

First, the new settlement approximately 1.5km from Billingshurst could draw trade away from the established village centre which it is critical to retain to serve the existing community. This would have the impact of reducing the vitality and viability of the established village centre as a whole with severe adverse consequences on the sustainability of Billingshurst.

*The Local Plan states:*

*...there is a risk that development in this location may have an adverse impact on the vitality and viability of existing villages, including Billingshurst.*

Alternatively, the established village centre may prevent the investment in new commercial services in the new town. This means that the new population has to rely on the established centres of Billingshurst, Horsham or Crawley with the consequent impact on traffic, parking and air quality. This would be exacerbated if either or both proposed strategic extensions to Billingshurst added pressure from a further 2,550 – 2,950 dwellings on the village centre. This second alternative would also result in an unsustainable centre.

### *Transport and Parking*

*Local Plan states:*

*It is considered that development in this location would have some traffic impacts upon the A29 and B2133 and within Billingshurst, Pulborough, Adversane, West Chiltington and surrounding area and there is currently a lack of endorsement from Network Rail for the provision of a new bridge over the railway which forms part of the re-routing of the B2133 and may potentially prejudice the vibrancy of the proposed new High Street.*

The new settlement proposed at Adversane is located within approximately 2.0km of Billingshurst.

Whilst the proposed new town prospectus includes the potential for employment provision within the settlement, the North West Sussex Strategic Housing Market Assessment, 2019, clearly demonstrates that the greatest part of housing demand in this area is coming from larger towns such as Horsham, Crawley and London.

In terms of access to employment, the Sustainability Appraisal compares the proposed Adversane new town unfavourably with sites at Ifield and Rookwood where a significant positive effect has been identified given that these sites are located adjacent to the higher order town centres of Crawley and Horsham (Para 4.14). The significant positive score is reflective of the importance of these towns in terms of employment opportunities for the surrounding area.

It can be safely assumed therefore that any new town proposal not located close to one of the higher order centres will generate significant traffic on existing roads, including to the railway station at Billingshurst. Commuting patterns (based on 2011 census data) indicate

that the level of private car trips is above the national average in the areas adjacent to the proposed new settlements.

Without confirmation from the rail authorities that there is capacity within the network for a new train station or that this is a commercial prospect, the notion of a new rail station to serve this proposed new settlement is fanciful and undeliverable. Similarly, there is no commitment to other public transport enhancements in perpetuity.

As previously discussed, it is also likely that new residents of this proposed new town would have to access some services in more established, or higher order settlements even in the longer term. In the short to medium term this is certain to be the case to meet even every day needs prior to the delivery of any on site services.

The distance from the proposed new settlement from facilities in Billingshurst, the absence of attractive footpath and cycleway links and a lack of realistic and sustainable public transport options is likely to result in a high number of trips being made from the proposed 4,500-dwelling site by private vehicle, which will result in increased congestion and decreased air quality at Billingshurst as well as wider adverse impacts on climate change.

The Sustainability Appraisal confirms that the negative effect of traffic from Adversane is likely to be significant:

*The delivery of a high amount of development at the large sites has the potential to increase the overall traffic in the District and therefore negative effects have been identified for all sites...For the sites (at) Adversane (SA597) the relationship of the site with the existing strategic road network and/or the lack of accessibility to sustainable transport as well as access to existing services and facilities means that the negative effect is likely to be significant. (Para 4.36).*

Increased congestion will be experienced on the A29 and at both A272 junctions and additionally putting further pressure on the New Bridge bottleneck and other existing local roads such as Marringdean Road for access to Billingshurst railway station.

Reduced air quality is likely to be experienced on the A roads, the roads to key services such as schools and within the village centre.

Parking demand at Billingshurst railway station will increase significantly. There are already considerable parking issues around the station and on local roads and there is unlikely to be sufficient additional capacity around the station to mitigate this situation.

The transport impact for this proposed new town shown in the Local Plan's Site Suitability Assessment is clearly not 'neutral' and should be changed to Very Negative Impacts unless there is conclusive traffic modelling, impact assessments and feasible/viable sustainable transport solutions to conclusively demonstrate otherwise.

### *Landscape*

The capacity of this potential new town is stated in the Reg 18 Local Plan as approximately 3,500 to 4000 units. This is classified as Large Scale Housing Development within the Landscape Capacity Study, 2020 (Para 2.6). The Landscape Capacity Study, 2020 sets that

part of the new town site which is located in Billingshurst Parish within Local Landscape Character Area 46: Little Wood, Adversane to Gilmans Farm.

The Landscape Capacity Study concludes that within this part of the site there is No/Low capacity to accommodate large or even medium scale development once mitigation is taken into account (Para 2.8). The Study explains that this means:

*The area is unable or only has very limited potential to be able to accommodate the specified type and scale of development without unacceptable adverse landscape and visual effects or compromising the values attached to it, taking account of any appropriate mitigation.*

For this reason alone, that part of the proposed Adversane new town within Billingshurst Parish should be firmly excluded from consideration as part of a new settlement in accordance with the District Council's own evidence.

The remainder of the new town site is located within Local Landscape Character Area 45: Brinsbury College and surrounds. The Study concludes that this area has Moderate capacity to accommodate large scale development once mitigation is taken into account (Para 2.8). The Study explains that this means:

*This area has an ability to accommodate development in some parts without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation There is a need for each proposal to be considered on its individual merits to ensure there are no unacceptable adverse impacts*

The Adversane area outside of Billingshurst Parish is an extensive area with a stated capacity for several thousands of dwellings. Nevertheless, according to the District Council's own evidence the area has capacity to accommodate large scale development only in some parts without unacceptable adverse landscape and visual impacts.

The 'neutral' landscape impact for this proposed large scale housing development shown in the Local Plan's Site Suitability Assessment is clearly incorrect based on the District Council's own evidence and therefore must be changed.

#### *Adversane Conservation Area*

The old settlement of Adversane is located within Billingshurst Parish and is designated as a Conservation Area. It contains a number of listed buildings. The proposed new town site abuts the south eastern boundary of the Conservation Area. The Landscape Capacity Study, 2020 states that the landscape to the south east of Adversane which forms the setting of the Conservation Area has a high Combined Landscape Sensitivity and Moderate-High Landscape Value, Development within this area would have a significant adverse impact on the setting of Adversane Conservation Area and its associated listed buildings and should be firmly excluded from consideration as part of the proposed new town site given the significant adverse impact on heritage assets.

#### *Coalescence*

The Local Plan states:

*The potential for the coalescence of development between Billingshurst and Pulborough has been identified as a particular concern.*

The size of development will interrupt the green gap between Billingshurst and Pulborough. For those travelling along the A29 it will appear there is coalescence of settlements: Billingshurst - Adversane - (Kingswood) - North Heath - Codmore Hill - Pulborough. This would be contrary to proposed Policy 29 in the draft Local Plan.

## **Biodiversity**

In terms of biodiversity, the Local Plan already states:

*The site promoter has indicated that biodiversity gains could be provided on this site, and that existing key habitats and ancient woodland would be protected. The potential site at Adversane falls within the bat sustenance zone declared in relation to the Mens SAC. Further work to understand the impact of this site on the Barbastelle bat - a protected species that roosts in the Mens Woodland, a designated Special Area of Conservation (which is of international importance) will however be required.*

The proposed site is an important foraging area for Barbastelle bats from the Mens Woodland and was a significant factor in this site being rejected previously (see the Habitat Regulation Assessment from 2014)

Three areas of Ancient Woodland lie within the site boundary (Steepwood Copse and Beedings Copse) and DEFRA (Natural England) has identified various deciduous woodlands within the site on its priority habitat inventory. Whilst the woodlands could be retained within any development, their habitat viability will diminish as their interconnectedness and relationship with surrounding grassland is diminished and lost through vast areas of built development and the presence of human activity.

The Biodiversity Record Centre records the land as being habitat for up to 19 Red Data List species, 4 Amber List species and 6 species listed under NERC S41.

The land is targeted by DEFRA for the Brown Hairstreak butterfly and Lapwing as priority species; with development the land will not be available as habitat

There will clearly be an impact on the biodiversity of this extensive site and adjoining designated and protected areas.

## **Flooding/ Drainage**

The Local Plan already states:

*The land is not identified as being at specific risk from flooding, although any development that comes forward will need to ensure that no further risks are generated as a result of the development either on or offsite or in the surrounding area.*

DEFRA (Environment Agency) Surface Water Data records much of the proposed site as at 1:30 year risk of flooding and building over the land will prevent the land acting as a natural water meadow/ soakaway.



The capacity of the culverts beneath the A29 and the public bridleway off Black Gate Lane between Haybourne and Northwood Farm House to cope with the increased run off is unknown. In addition the capacity of the watercourse from site to the River Arun and the suitability of a drainage strategy for the site is unknown.

With the impact of this proposed extensive development likely to have some adverse consequences on local drainage and flooding, it is not possible to evaluate the flooding impact as 'neutral' as shown in the Local Plan's Site Suitability Assessment.

## **Conclusion**

Such an extensive development as this proposed new town will have a significant number of adverse impacts on Billingshurst Parish especially if combined with one or both proposed strategic extensions to the village. These include the adverse impacts on

- the existing community infrastructure,
- the vitality and viability of Billingshurst centre,
- existing roads and parking,
- the landscape, in particular within the Parish
- Adversane Conservation Area and its setting,
- the erosion of open countryside and increased coalescence, and
- the wider issues of biodiversity, and drainage/flooding.

For these reasons, Billingshurst Parish Council strongly object to the proposed new town at Adversane.

## **How should the Reg 18 Local Plan be changed?**

The area of the proposed Adversane new town within the Billingshurst Parish boundary should be firmly excluded from consideration as part of a new settlement on landscape grounds (in accordance with the District Council's own evidence) and because it would cause substantial harm to, or loss of, significance of the Adversane Conservation Area and its setting.

The extensive area to the south of the Parish boundary should be deleted as a proposed new town.

It is the Parish Council's preference to provide new housing to serve the needs of Billingshurst not through the creation of enormous strategic extensions to the village or a new settlement at Adversane but through the promotion of brownfield sites within the defined built up area and local-scale greenfield sites abutting the built up area boundary. This will provide the opportunity for more modest sustainable growth to Billingshurst.

The Parish Council urge Horsham District Council to reject the proposed strategic extensions to Billingshurst of 1000+ dwellings and to work with them as part of an early review of the Billingshurst Neighbourhood Plan to jointly evolve an alternative strategy of a number of smaller scale allocations selected from the SHELAA, 2018.

The Sustainability Appraisal should be updated to take into account the issues raised in this objection.