



Billingshurst Parish Council

Response to Horsham District Council Local Plan 2019-36 (Regulation 18)

Horsham District Council (HDC) opened a consultation on its draft Local Plan on 18 February 2020. The Consultation closes at 5pm on 30 March, a deadline that is not changing due to the COVID-19 pandemic.

A Local Plan is a very important planning document, setting out the policies future development proposals must conform to. It also identifies and will decide on various housing sites known as strategic development sites, being sites for 800+ homes; as well as smaller development sites. These site allocations, once decided, effectively give developers the green light to make detailed plans for each and submit planning application proposals in the usual way, knowing the site is available for development and, subject to conforming to the Local Plan's policies, is likely to be favourably received.

HDC is under considerable pressure to approve a Plan that guarantees to deliver a 5-year housing supply - this is a legal requirement without which any district will be susceptible to any and all development proposals, effectively unregulated development. HDC is constrained by requirements of the National Planning Policy Framework (NPPF) and other guidance set out by the Government, part of which requires housing numbers to be set according to a so-called Standard Method. Whatever is included in the eventual Plan, it must be considered legally sound or else it will fail and development will be unregulated.

Parish Councillors are aware of many parishioners' views from recent presentations and meetings, such as the Crest-Bellway presentation on 5 February 2020 and at a Planning Committee meeting on 20 February 2020. At that Planning Committee meeting it was agreed, due to the time constraints of the process, this Council would submit its own response and residents were encouraged to make their own individual representations.

To assist the Council, it was agreed a planning consultant, Tony Fullwood, would be appointed, to support a Working Party of Councillors on the housing issue. Working together a proposed response was approved at a meeting of the Parish Council on Monday 23 March 2020.

The response focusses on the housing element of the draft Local Plan and considers the proposed Policy 14, Options for Housing Growth, considering first the impact of the Plan across the district, then specifically considering the policy for Billingshurst parish.

HDC sets out 3 options for housing numbers - either 1,000, 1,200 or 1,400 homes per year across the district. It is proposed this Council objects to all three options for the following reasons:

1. inappropriate calculation of housing numbers (the 5% buffer);
2. not enough consideration has been given of the impact of Crawley as a settlement;

3. the Government's Standard Method of calculation, which there are already calls to revise, is predicated on inappropriate base data (i.e. 2014 figures over 2016 figures);
4. there would be unacceptable demand on greenfield land.

Objection is also proposed to the part of the policy identifying the contributing elements to satisfying any housing numbers - HDC has omitted to acknowledge outstanding planning permissions outside those selectively named, of which, for this parish, only 150 units on Land South of Billingshurst is identified.

HDC's proposed policy then considers where in the district development should be targeted. It is considering 3 sites with implications for Billingshurst parish - land West of Billingshurst (for up to 1,750 homes), land East of Billingshurst (for up to 1,200 homes), and a new settlement south-east of Adversane (for up to 4,000 homes)

It is proposed Billingshurst PC objects to all three sites for the following reasons:

1. there is no recognition of the contribution Billingshurst parish has already made to earlier HDC housing targets
2. there is no proposed policy directing growth to the most sustainable locations in the district
3. targeting Billingshurst for such numbers is disproportionate within the district
4. it would contradict HDC's own assessment of the village as a Small Town/ Larger Village and fail to satisfy Strategic Policy 3 set out in the draft Local Plan
5. the demand placed on existing infrastructure, including the village centre, will exceed capacity
6. that the sites are outside existing defensible boundaries.

It is suggested, therefore, and recognising that the demands on HDC are such for a level of development to be inevitable, that the parish council would support promotion of brownfield sites within the built up area boundary and use of some local-scale greenfield sites abutting the BUAB, with this being identified and agreed jointly as part of an early review of the Billingshurst Neighbourhood Plan.

Residents may make their own representations to HDC until 5pm on Monday 30 March 2020 via the following:-

Online : <https://www.horsham.gov.uk/planning/local-plan/regulation-18-consultation>

Email : strategic.planning@horsham.gov.uk

Letter : Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

**Cllr Jon Perks
Chairman
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