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SUPPORTING STATEMENT FOR MATTER 2

18 July 2006

Development Strategy and Level of Housing Provision (CP4 and CP9)

Guidance for reading this statement:

Each bullet point answer corresponds to the following questions given as guidance in the 'Notes of the Pre-Examination Meeting':

- a. What part of the DPD is unsound?
- b. Which test(s), set out in paragraphs 4.23 and 4.24 of PPS12, does it fail?
- c. Why does it fail?
- d. How can the DPD be made sound?
- e. What is the precise change/wording that you are seeking?

1.0 The justification for the 'roll forward' to 2018.

1.1 Ref: HDC/Matter 2 – CP4

- a. CP4 states that 'provision is made for the development of at least 10,575 homes and associated infrastructure in the District within the period 2001 – 2018.'
- b. 2.
- c. Both the Issues and Options and Preferred Options consultations were based on the period 2001 – 2016, not 2001 – 2018, making comparison of the housing numbers extremely difficult. PPS12 states in 4.1 that '*Key to the success of the new system is the early identification of all issues in the preparation of a development plan document*', and in 4.2 that '*key decisions on the spatial strategy should be taken at the earliest possible stage to allow for full community involvement and sustainability appraisal*'. This Council believes that HDC has not front loaded the consultation and has thus failed to adequately consult on the spatial strategy.
- d. It is our view that it cannot be made sound.
- e. HDC should re-consult from the Issues and Options stage to enable full consultation of the rolled forward timescale.

2.0 The overall level of housing provision

2.1 Ref: HDC/Matter 2 - CP4

- a. CP4 states *'the development of land west of Horsham for 2,000 homes'*.
- b. 2.
- c. Both the Issues and Options and Preferred Options consultations were based on a development of 1,250 homes on land west of Horsham, but this was raised to 2,000 houses at submissions stage. In particular, guidance from the Planning Inspectorate entitled, 'Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents' on page 31, bullet 2.4.5 states that raising issues at the submissions stage which have not been raised previously at the issues and options or the preferred options stage may present problems for the Inspector. The guide also states that the Inspector may decide to give limited consideration to proposals that have not been subject to proper procedures of community involvement. This Council therefore feels it has been denied its right to properly defend the overall level of housing provision in the Core Strategy, as we are effectively precluded from making any comments that we have not made at the issues and options or preferred options stage. The failure by HDC to specify the potential increase in housing numbers on land west of Horsham in the issues and options and preferred options stages makes the community involvement procedures for the Core Strategy deeply flawed. It is noted that bullet point A4.3.4 of HDC's Position Statement for matter 2, now suggests that the developers predict that 2,300 dwellings can be provided within the plan period, thus potentially increasing the overall level of housing provision yet further.
- d. It is our view that it cannot be made sound.
- e. HDC should either re-consult on the Core Strategy from the Issues and Options stage for 2,000 houses on land west of Horsham or reduce the number of houses at the strategic location west of Horsham to 1,000, in policy CP4 part v.

2.2 Ref: HDC/Matter 2 – CP4 Page 26, bullet 4.6

- a. Bullet 4.6 states *'The scale of proposed development west of Horsham up to 2018 is a reflection of the relationship between the physical characteristics of the area involved and the need for specific infrastructure, including community facilities, as an integral part of the development process.'*
- b. 2 & 3.
- c. This policy fails test of soundness number 2, as there has been no consultation on specific infrastructure needed or supporting evidence provided to justify the scale of the development to pay for the supposed supporting infrastructure required. In HDC's Position Statement for Matter 5, they state in 3.22 that *'...that there would be negative effects on the environment and resource objectives but that further work would be necessary on assessing the precise effects as details emerge as part of the preparation of the proposed masterplan SPD and in the Environmental Impact Assessment at the planning application stage.'*
- d. It is our view that it cannot be made sound.
- e. HDC to re-consult with the local community on the Core Strategy from submission stage on specific infrastructure required now, using the Planning Obligations Supplementary Planning Document to fully cost the necessary infrastructure for 2,000

houses, and explain how the scale of the development on land west of Horsham is a requirement for this infrastructure.

2.3 Ref: HDC/Matter 2 - Sustainability Appraisal, page 35 bullet point 4.11

a. The Sustainability Appraisal states *'The document also sets out the requirement for the District to accommodate 190,000m² of employment floorspace and 9,335 dwellings, of which 2,500 are to be accommodated west of Crawley and 1,000 west of Horsham.'*

b. 2 & 3.

c. The Sustainability Appraisal for the strategic location west of Horsham is based on a development of 1,000 houses in the West Sussex Structure Plan, yet the Core Strategy plans for a development of 2,000 houses on land west of Horsham. PPS12 states in 4.16 that the local authority should submit the final Sustainability Appraisal with the Development Plan Documents. In HDC's Position Statement for Matter 5, they state in 3.22 that *'...that there would be negative effects on the environment and resource objectives but that further work would be necessary on assessing the precise effects as details emerge as part of the preparation of the proposed masterplan SPD and in the Environmental Impact Assessment at the planning application stage.'*

This Council argues that further work is required to produce the final Sustainability Appraisal. Additionally, as in page 24 of PPS12, the final Sustainability Appraisal should *'take account any changes as a result of the public participation on preferred options.'* However as we believe the issues and options and preferred options consultation to be deeply flawed, we contend that the final resulting Sustainability Appraisal would be equally flawed as we have do not feel that we have been adequately consulted on the overall level of housing provision. It is also noted that bullet point A4.3.4 of HDC's Position Statement for matter 2, now suggests that the developers predict that 2,300 dwellings can be provided within the plan period which would make the Sustainability Appraisal even more unsound.

d. It is our view that it cannot be made sound.

e. HDC should either re-consult on the Sustainability Appraisal from the Issues and Options stage for 2,000 houses on land west of Horsham or reduce the number of houses at the strategic location west of Horsham to 1,000, in policy CP4 part v.

4.0 The justification for most new development being concentrated in two urban extensions at Crawley and Horsham.

4.1 Ref: HDC/Matter 2 - Core Strategy Page 42, Bullet Point 4.42

- a. Bullet point 4.42 states *'The potential role of further development at Billingshurst and Southwater has been examined but it has been concluded that they should not be considered as strategic locations for development at this stage, given the opportunities which exist for a sustainable 'urban extension' at the main town of Horsham'*.
- b. 7.
- c. Billingshurst and Southwater should have been considered, especially since Southwater has a newly opened £20 million village centre and it is within the Gatwick Area Sub Region specified in the South East Plan and this region is required to take the majority of the development for the Horsham district. HDC has admitted in para 3.14 of their Position Statement for Matter 2 that the overall level of small scale growth in other settlements in the Core Strategy is lower than that specified in the West Sussex Structure Plan. However they do say that the figures in the Structure Plan are indicative rather than prescriptive, thus enabling them to justify the shortfall of small scale growth but equally giving them the option to disperse the additional 1,000 houses amongst the larger villages in the District.
- d. HDC should examine the potential to disperse the additional 1,000 houses allocated for the strategic location west of Horsham amongst the larger villages in the District.
- e. HDC should conduct a Sustainability Appraisal on the viability of dispersing the additional 1,000 houses proposed for west of Horsham at Billingshurst and Southwater.

4.2 Ref: HDC/Matter 2 - Core Strategy Page 27 Bullet Point 4.7

- a. This point states that *'The potential for an improved interchange at Pulborough Station with redevelopment of land in the vicinity is one possible such case.'*
- b. 7.
- c. This Council asks why further work has not been done to research dispersal of the extra 1,000 houses allocated for the strategic location west of Horsham throughout the larger villages of the District. In particular, there seems to have been a missed opportunity at Pulborough especially with the possibility of an improved interchange at Pulborough Station and HDC has admitted in para 3.14 of their Position Statement for Matter 2 that the overall level of small scale growth in other settlements in the Core Strategy is lower than that specified in the West Sussex Structure Plan.
- d. HDC should investigate the possibility of dispersing the extra 1,000 houses allocated for the strategic location west of Horsham throughout the larger villages of this District.
- e. HDC should conduct a Sustainability Appraisal on the viability of dispersing the additional 1,000 houses proposed for west of Horsham at Pulborough or other large villages.

4.3 Ref: HDC/Matter 2 - Core Strategy Page 43 Bullet Point 4.42

- a. This point states that the re-development of the Rookwood Golf Course as an alternative is not considered appropriate on the basis of the Background Paper '*Land West of Horsham: Strategic Development*'.
- b. 7.
- c. There has not been a rigorous comparison of this land versus that proposed at Broadbridge Heath, and PPS12 states in para 4.2 that '*The preparation process should include consideration of all the alternative options derived from the development of the evidence base...*'
- d. It is our view that it cannot be made sound.
- e. HDC should undertake a Sustainability Appraisal for both locations to enable a clear comparison to be made.

4.4 Ref: HDC/Matter 2 - CP3 & CP7

- a. CP3 states that '*development will be expected to...complement the character and heritage of the District*', and CP7 states, '*the development should be integrated with Horsham and Broadbridge Heath.*'
- b. 3.
- c. The development of 2,000 houses at land west of Horsham will spoil the special character of Horsham as an historic market town, surrounded by character villages. A development of 2,000 houses will lead to the convergence of Broadbridge Heath into Horsham, creating an urban sprawl that will spoil the shape of this historic market town.
- d. HDC should take note of policy CP3 and alter policy CP4 to reduce the number of houses at the strategic location to 1,000. Take particular note of the West Sussex Structure Plan Panel Report para 6.54 which stated '*It may be possible to accommodate greater numbers than 1000 but we are not recommending this. There is no need or justification at present and in any event further assessments would be required to test its feasibility.*'
- e. Reduce the number of houses at the strategic location west of Horsham to 1,000, in policy CP4 part v.

4.5 Ref: HDC/Matter 2 - CP4

- a. CP4 states '*the development of land west of Horsham for 2,000 homes*'.
- b. 2.
- c. Both the Issues and Options and Preferred Options consultations were based on a development of 1,250 homes on land west of Horsham in accordance with the West Sussex Structure Plan, but the overall level of housing provision was raised to 2,000 houses at submissions stage. It is also noted that bullet point A4.3.4 of HDC's Position Statement for matter 2, now suggests that the developers predict that 2,300 dwellings can be provided within the plan period, thus potentially increasing the urban extension of Horsham thus further.
- d. It is our view that it cannot be made sound.
- e. HDC should reduce the number of houses at the strategic location west of Horsham to 1,000, in policy CP4 part v.

4.6 Ref: HDC/Matter 2 - CP7

- a. The area for development for the strategic location west of Horsham is identified as *'within the area west of Horsham bounded by the A264 to the north west, the River Arun to the south west and the railway to the south east.'*
- b. 3.
- c. Southern Water objected to this development at the Preferred Options stage because it is too close to the sewage works. The Panel Report on the adopted West Sussex Structure Plan in para 6.39 stated that *'Staying with the sewage works, it is cited by local groups as a major constraint because of smells. We agree that development would need to be kept well away from the facility but floodplains may dictate this in any event'*.
- d. HDC should reduce the number of houses at this strategic location to 1,000, so that the development does not need to be in such close proximity to the sewage works.
- e. Reduce the number of houses at the strategic location west of Horsham to 1,000, in policy CP4 part v.

4.7 Ref: HDC/Matter 2 - CP7

- a. CP7 states that *'Development will be programmed in order to enable the completion of 2,000 homes and other uses within the defined area by 2018.'*
- b. 7.
- c. The location is too rigid to cope with the unknown timescale for the improvements to the A24 Warnham to Capel, as the development should not proceed before the improvements have taken place. (West Sussex Structure Plan Panel Report - para 6.56)
- d. Rt. Hon. Douglas Alexander MP, Secretary of State for Transport, wrote to the Leader of SEERA on 06 July 2006 and confirmed that the A24 Horsham to Capel improvement scheme will not be funded in the first five years of the Regional Funding Allocations.
- e. HDC should look to extend the urban settlements at larger villages that would not be reliant on the central government making major improvements to the A24.

5.0 The overall level of small scale growth in other settlements.

5.1 Ref: HDC/Matter 2 - Core Strategy Page 42, Bullet Point 4.42

- a. Bullet point 4.42 states *‘The potential role of further development at Billingshurst and Southwater has been examined but it has been concluded that they should not be considered as strategic locations for development at this stage, given the opportunities which exist for a sustainable ‘urban extension’ at the main town of Horsham’.*
- b. 7.
- c. Billingshurst and Southwater should have been considered, especially since Southwater has a newly opened £20 million village centre and it is within the Gatwick Area Sub Region specified in the South East Plan and this region is required to take the majority of the development for the Horsham district. HDC has admitted in para 3.14 of their Position Statement for Matter 2 that the overall level of small scale growth in other settlements in the Core Strategy is lower than that specified in the West Sussex Structure Plan. However they do say that the figures in the Structure Plan are indicative rather than prescriptive, thus enabling them to justify the shortfall of small scale growth but equally giving them the option to disperse the additional 1,000 houses amongst the larger villages in the District.
- d. HDC should examine the potential to disperse the additional 1,000 houses amongst the larger villages in the District.
- e. HDC should conduct a Sustainability Appraisal on the viability of dispersing the additional 1,000 houses proposed for west of Horsham at Billingshurst and Southwater.

5.2 Ref: HDC/Matter 2 - Core Strategy Page 27 Bullet Point 4.7

- a. This point states that *‘The potential for an improved interchange at Pulborough Station with redevelopment of land in the vicinity is one possible such case.’*
- b. 7.
- c. There seems to have been a missed opportunity at Pulborough to disperse some of the extra 1,000 houses allocated for the strategic location west of Horsham, especially with the possibility of an improved interchange at Pulborough Station and HDC has admitted in para 3.14 of their Position Statement for Matter 2 that the overall level of small scale growth in other settlements in the Core Strategy is lower than that specified in the West Sussex Structure Plan.
- d. HDC should investigate the possibility of dispersing the extra 1,000 houses allocated for the strategic location west of Horsham throughout the larger villages of this District, including Pulborough.
- e. HDC should conduct a Sustainability Appraisal on the viability of dispersing the additional 1,000 houses proposed for west of Horsham at Pulborough or other large villages.

6.0 The achievement of the planned level of build rates.

6.1 Ref: HDC/Matter 2 - CP7

- a. CP7 states that *‘Development will be programmed in order to enable the completion of 2,000 homes and other uses within the defined area by 2018.’*
- b. 9.
- c. The land west of Horsham strategic location is too rigid to cope with the unknown timescale for the improvements to the A24 Warnham to Capel, as the development should not proceed before the improvements have taken place. (West Sussex Structure Plan Panel Report - para 6.56).
- d. Rt. Hon. Douglas Alexander MP, Secretary of State for Transport, wrote to the Leader of SEERA on 06 July 2006 and confirmed that the A24 Horsham to Capel and Ashington to Southwater improvement schemes will not be funded in the first five years of the Regional Funding Allocations.
- e. HDC should reduce the number of houses proposed for land west of Horsham to 1,000, in policy CP4 part v.