

Rusper Parish Council response to Horsham District Local Plan 2019-36 Public Consultation (Regulation 18)

28th March 2020

Overall Response

The words “growth” and “sustainable” are used throughout the document for all aspects of the plan including housing, employment, and biodiversity. Yet it still insists that environmental needs will be met and prioritised. It seems that there has been a failure to realise the real facts and use basic logic when creating this document. There is a finite amount of land in the district and all of these things cannot grow without consequential environmental impact.

Its fundamental objectives are unattainable in any real scenario and the plan fails to identify which aspects will be sacrificed when these real world constraints are applied.

We have some sympathy with Horsham District Council's position, as it is based on unachievable and conflicting government policies and a central government taking more control of local matters, especially housing numbers.

The document emphasises “growth” throughout, but this is obviously unattainable for all areas of the plan as the actual land area for the plan has actually been reduced by the establishment of the South Downs National Park, whose own plan now covers part of the area covered by earlier Horsham District plans.

All assertions for growth should be based on three main factors:

1. The ability of the environment to accommodate and support the growth
2. Likely predictions for investment and economic growth
3. Likely predictions for population growth

This plan fails on all three counts. Again we sympathise with Horsham District Council, as national government has failed to identify these factors and has imposed unachievable objectives on the planning authority.

However, that is no excuse to produce a plan that fails to clarify the consequences of government targets. Local communities need to be clear that the environment is being sacrificed to meet unrealistic government housing and economic growth figures. At least then they will know what they are actually voting for and not this veil of policies that suggest that everything is possible. It is dishonest to imply that the environment can be protected, let alone enhanced, in these circumstances.

Two primary factors have been neglected in this plan:

The first is the global environmental emergency, which the UK government formally recognised in May 2019. This should focus attention on protecting all green field land and ensuring it remains green for agricultural, forestry, recreation or the natural ecology. Any additional housing need must be met by brownfield development, or intensification of already allocated sites.

The second critical factor is one that could not have been predicted, at least not against any timescale, and this is the Coronavirus pandemic. This has led to a catastrophic economic collapse, greater than anything we have seen in a generation. It throws all previous economic growth

assumptions out of the window. Its impact on death rates is still to be seen, but a significant reduction in elderly population figures is highly likely.

Finally, as with previous plans, this is a development led document and not a plan led proposal. The plan should first identify how the overall infrastructure needs such as basic services, schools, hospitals, doctors surgeries, public transport etc will be met. Those should be scheduled and in place before development starts. The build it and they will come approach in this plan is wholly inadequate for what is supposed to be an advanced society.

Summary

In summary, the plan is flawed as it fails to clearly identify the inevitable environmental impact that the increased housing numbers across strategic green field sites will cause.

It fails to challenge conflicting government policies and identify the consequences of these to the local population in terms of their environment and health.

Responses for specific sections of the plan

Chapter 3: Spatial Vision and Objectives

The general principles are what we would support, except that the presumption of growth of land use for economic and housing doesn't match with the more important principles of environmental quality and climate change or those of preserving the natural environment and district character. We would suggest that the word growth is removed, especially as the actual land area for the plan is reduced with the creation of the South Downs National Park. A broader principle of intensified land use for economic and housing purposes would be supported.

We would also support HDC using this land for Council house building wherever possible.

Account for the recent Coronavirus pandemic also needs to be reflected in the Economy section as this has caused the greatest financial slump in living memory.

Chapter 4: Policies for Growth and Change

Again, the use of the word "Growth" is misleading as the available land has actually decreased and this needs to be addressed more specifically. The plan is completely flawed if it assumes that the environment can improve when more land is devoted to the very things that are causing environmental collapse.

The need for a step change in housing growth in the area is not substantiated. The last HDPF was based on a local housing need of around 350 houses per annum for the plan period and for the final plan this had been increased to 900 per annum! At the 900 level it was already unsustainable in the long term, without completely destroying the local environment. Those increases were to account for extra housing provision for Crawley, Brighton, London and other local areas that could not meet their housing need. It seems that those extra numbers are being added in again, without any justification.

The housing market in the Horsham district is already at capacity with the existing allocated sites and developers are struggling to sell the units they are already building. Any increase in the previous HDPF allocation of housing cannot be justified in economic or sustainability grounds and will be disastrous for the environment.

The concept of "Sustainable development" within the NPPF seems fundamentally flawed. At a time of climate emergency especially, any development that leads to a loss of green environment is clearly not sustainable. It will lead to increased pollution and CO2 emissions whilst removing the

green infrastructure that helps to deal with that. It is contrary to the policies set out in the government's climate emergency declaration of May 2019.

Chapter 5: Economic Development

In the light of the recent economic collapse, the emphasis needs to be on rebuilding and supporting the local economy, rather than that word "growth" again. The emphasis clearly needs to be on encouraging businesses that reflect future needs, rather than propping up and encouraging the type of business models that are creating more pollution and claiming more of our local environment for profit rather than local needs.

Extra focus on education and training is important, to ensure that we have the skills locally to meet the needs of the evolving workplace.

Specifically, the sites in Langhurstwood Road would be suitable for intensification of use, but any expansion of these sites would be bad for the environment as it would lead to a loss of green space and wildlife habitat and a spread of the pollution impacts.

Any new commercial units should be required to provide electric vehicle charging points for the expected number of car spaces for staff and clients.

Chapter 6: Housing

Housing assessment at time of original HDPF in 2015 was for 750 homes per annum, to meet the needs of Horsham Planning District, Gatwick Diamond/Northern West Sussex housing, plus an allowance for the Coastal housing market area deficit.

Why are we seeing a growth of at least 450 per annum (to 1200) or more than 60% over 5 years, when these figures were supposed to represent the need through to 2031 and population growth rates are falling in the UK?

The government needs to be challenged on its housing projections. There are a number of contradictions in the method they use and the broader government policies for environment and public health.

It is still not clear how a figure of over 1,000 homes per year for HDC has been reached.

The government says that the house figures pushed onto planning authorities is based on the Household projections for England from the Office for National Statistics. However, looking at their latest figures (see

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/2016basedhouseholdprojectionsinengland/2016based>) it is clear that the government expects a 23% increase in house numbers up to 2041. So for Horsham with around 59,000 homes currently this would mean an annual increase of 646 units, or less than the current HDPF is delivering. Even with the originally proposed 150 extra for Crawley and 100 for the London effects, this would still only be the 900 per annum that is already being delivered. So there seems to be no justification for any extra, unless someone is double counting numbers somewhere.

Thus Strategic Policy 14 needs to be changed, ideally to reflect the 646 units that the government statistics suggest, and certainly no more than the 900 of the current HDPF.

Even given this, the government documents go on to point out that:

"The number of households is projected to increase because of increases in older households without children"

"The number of households with dependent children is projected to remain broadly similar between 2016 and 2041, with around a quarter of households having dependent children by 2041."

"Almost all the projected increase in households by 2041 will be among one-person and multiple adult households without dependent children."

This suggests that there is no need for significant extra general housing stock, but more a need for

specific focus on single occupancy units like flats, which provide a much better housing concentration and that there is no need to increase the existing HDPF land space allocation for housing. More than that, the housing policy should specifically reflect the need for all developments to be predominantly low occupancy units.

Whilst we understand that allocating all of the current HDPF sites to this type of unit is not desirable in terms of housing distribution and community structure, it does suggest that these sites should still have a balance skewed to single occupancy units. Where other sites in lower density areas are redeveloped, they should be entirely units of this type.

Potential Housing Allocations

In terms of Potential Housing Allocations, given the information above from government figures and the government's declared global environmental emergency, which the UK government formally recognised in May 2019, we would suggest that no more sites should be allocated than those already recognised in the existing HDPF.

Any extra capacity in terms of housing units should be met by an increase in housing density with more smaller units being produced in line with the government's own conclusions.

In response to the specific proposed allocations within or around Rusper Parish, we would make the following comments:

Land West of Crawley, Rusper

Rusper Parish Council STRONGLY OBJECTS to this proposal.

The site description states that this is “adjacent to the busy road network”, but in fact this area is not connected to any A or B roads and any exits from this site would be onto unclassified neighbourhood roads in Crawley, or narrow country lanes in Rusper.

A more valid description of the proposed site would be:

This is an area of open countryside and farmland with ancient hedgerows and woods. A principle part of the site is an existing golf course, which provides recreation and exercise amenity to the local people. The rest of the site provides important flood protection for areas further downstream on the River Mole, in addition to the farming use for food production and green space to improve the quality of the environment.

The land shown in red on the plan is only a part of the overall proposal from Homes England, so this proposal is highly misleading. It has been suggested that the area shown would provide around 3,000 houses and that Homes England would only provide the infrastructure requirements to support the development if the larger area through to Faygate and Lambs Green was included and 10,000 houses built. This would be equivalent to destroying almost half of the countryside in Rusper Parish!

The area is shown as amber for biodiversity, but it is unclear how this can be anything but red. The current area along Ifield Brook and the golf course provides a rich wildlife habitat with much diversity. The farm land is not intensively managed, so the fields and hedgerows are also a rich wildlife habitat with as wide a range of flora and fauna that could be expected for this area. It is unclear how building 3,000 houses on the area shown on the plan could be anything short of an environmental disaster for this area and would significantly reduce biodiversity. The area also has many ancient hedgerows and ancient woodland and development on this scale will have a major impact on the wildlife that is dependent on these.

Ifield Golf Course would form the start of this development, with the consequential loss of an important local amenity. This area not only provides a space for people to exercise while playing golf, but also for local residents to walk and enjoy the rural setting. Add to that the value of this open and maintained environment for wildlife, and the overall impact for existing local

communities is significant.

The viability section states *“At this stage, it is considered that there is potential for the development on this site to be viable”*, but the latest HDC SHELAA 2018 Housing Report shows all evaluated sites in this area as *“Not Currently Developable”*. It is not clear how the conclusions of these detailed studies have changed. We would refer HDC to its own SHELAA reports where, when considering this proposal, it states *“There are a number of constraints which impact the suitability and achievability of development on this site. This includes impacts on flooding, and the setting of Ifield Conservation area. The northern part of the site is within the Gatwick Airport Safeguarding area and noise contours. There are also a number of infrastructure issues which would need to be addressed, including sewerage and impacts on the existing road infrastructure”* and it is contrary to policies 1, 4 and 26 of the HDPF.

The proposal states the the development quality provides *“A clear vision for the site has been identified, based on Garden Community Design Principles”*. However, this is completely untrue, as only a rough outline of the area, with no densities or facilities, has been provided. There is no clear indication of how traffic will be managed and the suggested relief road, is currently a road to nowhere with no identified exit point onto the wider major road network.

There is no justification for a development of this scale anywhere in the district and the government's own growth figures and housing requirements prove that this development should not be considered.

This proposed site would break every policy in the Rusper Neighbourhood Plan and render that plan useless and make a mockery of the Governments localism policies.

Land at Kingsfold, Warnham (North West Horsham)

Rusper Parish Council STRONGLY OBJECTS to this proposal.

Again the implication that this site is deliverable and viable are misleading. The improvements to the A24 indicated are only around Kingsfold and the issue of the rest of the A24 between Horsham and Capel being a single carriageway are not addressed. This would mean that traffic from this site would be adding to the already significant problems along this stretch of road.

The concept of developing to the east of the railway line is beyond comprehension on any planning grounds and to suggest this, without a major rail crossing, is against all planning policy. Traffic accessing this side of the site would be onto single track country lanes, which could not possibly support the traffic associated with this many houses. It is impossible to see how a development of this size would support the necessary road improvements needed for both the A24 and the country lanes on the Rusper side. Also, part of Friday Street is designated as a “Notable Road and Verge” so development of this road is even less viable.

There is no indication of how secondary education would be managed. Secondary school provision to the west of Horsham is already inadequate and the new school proposed in North Horsham will struggle to meet existing demand.

Given the nature of the infrastructure requirements, added to the problems and cost associated with building on this type of blue clay soil, it is unclear how development in this area could be financially viable, unless Horsham is again going to relinquish CIL requirements and force the infrastructure costs on the existing rate payers.

In addition, given Gatwick's insistence on its need to expand, the potential impact of additional air traffic on noise and air pollution in this area needs to be carefully considered. That, along with the approved incinerator plant right next to this site, means that in terms of air quality this site should not be permitted. This area also fall within SSSI Impact Risk Zone 29316 for infrastructure and air pollution concerns.

The environmental impact has not addressed, with much of this area having ancient hedgerows and an ancient woodland at Old Barn Gill.

All of the area to the east of the railway would fall into Rusper Parish and development in this part

of the parish would be contrary to the policies of the Rusper Neighbourhood Plan.

Land at Rookwood, Horsham

Rusper Parish Council STRONGLY OBJECTS to this proposal.

Although not within the Rusper Parish, any further development along this stretch of the A24/A24 will increase the road traffic in the area and the road network is not capable of supporting it. This would inevitably lead to increased rat running through the country lanes of Rusper parish which are not capable of safely handling any increase.

Also, the impact on the nature reserve next to this proposed site does not seem to have been given sufficient weight and thus the biodiversity rating of amber is questioned. The idea that developing a green field site and isolating an important nature reserve can provide a biodiversity net gain calls into question all biodiversity assessments and their scientific validity.

In addition, the fact that the Education rating is shown as green when there is no indication of any additional educational provision as part of this development needs review. This is especially true for the west of Horsham where Secondary Education provision is already inadequate.

Smaller Scale Development

In terms of smaller scale development proposals, Rusper Parish Council strongly feels that no new sites should be allocated that are not already identified with the existing HDPF or Neighbourhood Plans or it is on a brown field site.

Any further housing requirement should be met by increasing the density of proposed developments and any further green field development should be avoided at all costs. This would be in line with government policy on the type of housing required and to align with the objectives of the climate emergency declaration.

Strategic Policy 15

Point 1: This should include access to public transport as a requirement for any strategic site development.

Point 5: “*Deliver high-quality mixed-use communities that provide a range of housing types and tenures,*” should be “*Deliver high-quality mixed-use communities that provide a range of housing types and tenures, with an emphasis on high density single and low occupancy units*”

Point 6: This should include a requirement for all units to include solar energy capture specifically.

Chapter 7: Conserving and Enhancing the Natural Environmental

The policies here are generally accepted by Rusper Parish Council. However, much of the rest of the plan is in contradiction to these policies, so it seems that they are not being given the priority they warrant, especially given the government declared state of climate emergency.

Chapter 8: Development Quality, Design and Heritage

This is an area that could be much more aligned with the environmental aspirations of the plan. It would be better to impose the highest standards of insulation and energy efficiency at the time of building houses, to align with the government's climate emergency proposals, than to try to retro-fit these later when we find that carbon levels are not being met.

Chapter 9: Climate Change and Flooding

This should be Chapter 3 of the plan to emphasise its importance and to set the reference point for

all other sections of the plan. If the government is to have any chance of achieving the ambition of becoming net carbon zero by 2050, then the policies here must form the basis of all other policies. If the effects of climate change are not to lead to an increase in the extreme weather conditions which we are starting to see as regular occurrences, and make a significant financial impact, then real action needs to start now.

We must impose the highest standards for insulation and energy efficiency on all new buildings.

We must stop all building on land used for food production or forestry.

We must provide the highest standards of infrastructure.

We must enforce solar energy capture for all new roof structures.

We must provide electric charging points at all new developments.

All of these are simple and obvious, but are not forming part of the policies in any enforceable way.

With regards to flooding, it needs to be accepted that any green field development increases the flood risk. This is two fold: firstly, by removing the green plants that absorb carbon dioxide and secondly, by covering land that would otherwise act as at least a temporary sponge during times of heavy rain. On site mitigation merely increases the risks further downstream in the water network.

Chapter 10: Infrastructure, Transport and Healthy Communities

It is unclear how any of the strategic sites within this plan could go ahead given the current infrastructure problems throughout the district. There is a shortage of Secondary Schools, Doctors, Hospitals, services such as sewage and water and the public transport system is highly inadequate. Despite this, there is no overall plan for how these problems will be resolved **BEFORE** any development starts. For any proper plan led development, all of these things should be in place before any housing or commercial development starts.

There is insufficient emphasis on public transport and how this can be achieved. It should be a requirement for any new development, that it will not be permitted unless a regular public transport system is within walking distance of all houses on the development. For any new development, this will require commitment from an accredited public transport provider that this will be the case.