



Horsham
District
Council

Horsham District Local Plan

Regulation 19 Summary of Representations

July 2024

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Introduction

Context

- 1.1 Horsham District Council is preparing a new Local Plan, that will be used to guide development in the District between 2023 and 2040. As part of the production of its Local Plan, the Council has undertaken two rounds of consultation on what the Local Plan ought to contain, in accordance with the Council's adopted Statement of Community Involvement¹.
- 1.2 In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (hereafter referred to in this report as 'Regulation 18'), between 6 April and 26 May 2018, the Council consulted on the Issues and Options for Employment, Tourism and Sustainable Rural Development document. A summary of the responses made during the consultation and the proposed next steps have been published online².
- 1.3 Between 17 February and 30 March 2020, the Council consulted on a partial draft version of its Local Plan, also in accordance with Regulation 18. This included draft policy options and presented different options for site allocations. A Consultation Report was published³ that describes how that consultation was publicised and provides a summary of the responses received and how such comments were taken into account by the Council.

Regulation 19 Local Plan

- 1.4 The Horsham District Local Plan 2023-2040 was published for a six-week period between 19 January and 1 March 2024. It was published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (hereafter referred to in this report as 'Regulation 19'). This Regulation 19 Report describes the methods to publicise the representation period and a summary of the main issues raised during the publication period.
- 1.5 Regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Council to describe how the Regulation 18 periods were undertaken, a summary of representations made and how they were taken into account. The same regulations also require the Council to provide the amount of representations made during the Regulation 19 period and a summary of the main issues raised in the representations. Taken together, the two Regulation 18 Consultation Reports and this Regulation 19 Report satisfy the requirements of Regulation 22 (c).

Publicising the Regulation 19 Horsham District Local Plan

- 1.6 The Council sought to publicise the representation period by a variety of means in order to maximise awareness to ensure a wide range of views were obtained on the Regulation 19 Horsham District Local Plan.

Website

- 1.7 The draft Local Plan and all supporting documents were placed online. A guidance document and FAQs were on the Council's webpages to guide users as to how representations could be made. A link of the Council's website directed users to the Local Plan's consultation portal, that allowed people to register on the portal (if they had not already done so) and make representations.

¹ https://www.horsham.gov.uk/data/assets/pdf_file/0011/89471/Statement-of-Community-Involvement-approved-September-2020.pdf

² https://www.horsham.gov.uk/data/assets/pdf_file/0008/70955/Summary-of-Representations-Issues-and-Options-2018.pdf

³ https://www.horsham.gov.uk/data/assets/pdf_file/0012/132420/Regulation-18-Consultation-Report-January-2024.pdf

- 1.8 The consultation portal allowed users to complete a representation form to submit comments to the Council. A version of the form was made available on the website to download, which allowed users to complete in a word processing package and email their representations if they preferred.

Notifications

- 1.9 Statutory consultees, such as West Sussex County Council, neighbouring local planning authorities, national environmental bodies (Environment Agency, Natural England and Historic England), the District's Parish and Neighbourhood Councils and infrastructure providers (e.g. Network Rail, National Highways, Southern Water etc.) were notified by email of the consultation.
- 1.10 Those who had registered on the consultation portal were emailed both prior to the start of consultation, as the consultation period began and during the consultation.

Libraries

- 1.11 Copies of the Local Plan, Policies Maps, Sustainability Appraisal, Habitat Regulations Assessment, Statement of Community Involvement and other relevant supporting documents were delivered to each of the 7 libraries⁴ within the District, as well as Crawley Library. The libraries were given posters to advertise the representation period and paper copies of the representation form.

Advertising

- 1.12 Adverts were placed in community magazines and West Sussex County Times at the start of the consultation period and press releases were made and carried in local media publications.

Social Media

- 1.13 The Council's Facebook, Instagram, LinkedIn and Twitter (now 'X') accounts were used to advertise the publication of the Regulation 19 Horsham District Local Plan, with reminders issued throughout the representation period to prompt as many responses as possible.

Representations

- 1.14 A total of 1,636 representations were received, made by 1,038 different respondents – reflecting that some of those that responded submitted multiple representations. Respondents included individual members of the public, representative bodies including Parish Councils and community groups, those representing the development industry such as landowners and site promoters, as well as statutory bodies such as the Environment Agency and neighbouring local authorities.
- 1.15 The majority of comments were submitted online through the Council's Inovem web portal, with 262 submitted by email and 49 by post.

Processing Representations

- 1.16 All comments received were initially electronically sorted (known as 'tagging'), classifying the content of the comment against the part or parts of the Local Plan to which they related. Comments were categorised as to whether they objected, supported, or made an observation (commenting on a policy but neither objecting or supporting a particular viewpoint). The process allowed multiple tags for each representation – for instance if someone objected to one policy but supported another, the representation could be registered against both policies.

⁴ During part of this period, Storrington Library was closed. Material was placed in Chanctonbury Leisure Centre during this closure.

- 1.17 A number of duplicate representations were submitted, for instance with identical comments from the same respondent being submitted via both the Inovem portal and email. In such circumstance comments were counted once and duplicates were removed.

Consultation Summaries

- 1.18 After comments were processed in the manner described above the comments were reviewed on a policy-by-policy basis, and the issues raised summarised. Summary tables are presented in Appendix 1.
- 1.19 The summaries are a reflection of the issues raised during the consultation. They do not record every single comment or view that was made during the consultation. Full representations have been published online⁵.
- 1.20 As comments were able to be tagged multiple times against different areas of the Local Plan, the total of comments for each individual summary combined exceeds the number of comments received and is not an error. This reflects that many representations covered numerous issues in their submission.
- 1.21 Several comments were submitted on the evidence base documents produced to support different elements of the Local Plan. Where relevant they are recorded in the summaries of related policies. For instance, it was common for those objecting to sites not being included in the Local Plan to refer to the Sustainability Appraisal and/or Site Assessment work and seeking to make amendments to appraisals/assessments. Individual summary tables for evidence documents are therefore not shown. Similarly, suggested changes to the Policies Maps were captured with regard to relevant policies and allocations. A number of representations were received which commented on the representation process. A summary table has been produced to capture such views.
- 1.22 It was common for representations to express that a particular allocation was inconsistent with a particular policy. In such instances, this was recorded as an objection against an allocation rather than a support/observation against a particular policy.

Themes from consultation

Housing

- 1.23 As was the case in the preceding Regulation 18 consultation, housing (both in terms of amount and location) was the focus for many of the respondents.
- 1.24 Typically the development industry felt that the amount of housing proposed was too low and not justified, while many residents and community groups felt that development had been and/or would be too high. Many commented on the impact that new housing was causing and/or would cause to existing communities and settlements.
- 1.25 With regards to specific sites, all of the three strategic allocations (HA2: West of Ifield, HA3: North West of Southwater, and HA4: East of Billingshurst) had greater amounts of opposition than support, with HA2: West of Ifield attracting the greatest number of representations. It was also generally true that the smaller sites attracted opposition rather than support, with conflict with Neighbourhood Plans being a common theme. The amount of objection varied throughout the district, with sites in Storrington (particularly STO1: North of Melton Drive/South of Northlands Lane) receiving high numbers of representations.
- 1.26 A number of those representing sites not included within the Local Plan, put forward a view that their site(s) should be allocated in preference or in addition to the proposed allocations. A list of such

⁵ https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/consultationHome

sites are included in the 'Omitted Sites' summary table. Reasons for each site varied, but it was common for representations to express that the Local Plan should plan for a greater amount of development and that their site could assist in this regard.

Other Policies

- 1.27 Strategic Policy 9: Water Neutrality received the most representations, aside from some proposed allocations. Comments received differed depending on types of respondent. It was common for the development industry to view water neutrality and/or the policy as imposing constraints that would impact on development activity. Comments from residents and community groups often thought that the approach was not precautionary enough and/or that measures taken to reduce water use in new development would be ineffective.
- 1.28 Strategic Policy 17: Green Infrastructure and Biodiversity also attracted large volumes of interest. In general, comments from the community were of the view that the Local Plan would cause harm to biodiversity rather than improve it, while some in the development industry did not support a Biodiversity Net Gain requirement that went further than the nationally set requirement.