



**Horsham
District
Council**

Representation Form

Southwater Neighbourhood Plan 2019-2031

The Neighbourhood Planning (General) Regulations 2012 (as amended) - Regulation 16

Southwater Parish Council has prepared a Neighbourhood Development Plan (SNP). The Plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. In accordance with Regulation 16 of the Neighbourhood Planning Regulations 2012 (as amended), the SNP and associated documents will go out to consultation (**Friday 7 June to Friday 19 July 2019**) for 6 weeks inviting representations on the draft submission plan, basic conditions statement, consultation statement and the Strategic Environmental Assessment (SEA).

Copies of the Southwater Neighbourhood Plan and supporting documents are available to view on the Horsham District Council's website:

<https://www.horsham.gov.uk/planningpolicy/planning-policy/currentconsultations>

Hard copies of the documentation are available upon prior request for inspection at **Horsham District Council offices**; Parkside, Chart Way, North Street, Horsham, RH12 1RL between 9am and 5pm Monday to Friday. Please see Public Notice for other locations and opening times.

All comments must be received by 5:00pm on Friday 19 July 2019

There are a number of ways to make your comments:

1. Please use the above web address above to make your representation online ; or
2. Complete this form and email it to: neighbourhood.planning@horsham.gov.uk ; or
3. Print this form and post it to: Neighbourhood Planning Officer, Horsham Council, Parkside, Chart Way, North Street, Horsham, RH12 1RL

All comments will be publicly available, and identifiable by name and (where applicable) organisation. Please note that any other personal information provided will be processed by Horsham District Council in line the Data Protection Act 1998 and General Data Protection Regulations. Horsham District Council will process your details in relation to this preparation of this document only. For further information please see the Council's privacy policy: <https://www.horsham.gov.uk/privacy-policy>

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

PART A	Your Details
Full Name	
Address	
Postcode	
Telephone	
Email	
Organisation (if applicable)	
Position (if applicable)	
Date	19/7/2019

PART B

To which part in the plan does your representation relate?

Paragraph Number:	4.1 – 4.16	Policy Reference:	SNP2
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support Support with modifications Oppose Have Comments

<p>Please give details of your reasons for support/opposition, or make other comments here:</p> <p>The HDPF provides that at least 1500 new homes will be required across the District in addition to those allocated to specific ‘strategic development’ sites, but nowhere sets out a housing requirement figure for individual parishes (as strategic-level plans elsewhere have done), stating merely that the additional new homes will be allocated through neighbourhood planning ‘in accordance with the settlement hierarchy’ (# Policy 15.4). Recognising that Southwater Parish will need to accommodate a proportion of these 1500 additional new homes, the Plan (# 4.4) appears however to have unquestioningly accepted the figure of ‘at least’ 422 units suggested in the AECOM housing-needs report, on the grounds that this is an ‘appropriate share’ for Southwater as a ‘second tier’ settlement in the hierarchy established by HDPF Policy 3. This conclusion ignores the fact that, not only has Southwater village already received over 800 new dwellings in less than a decade (cumulatively at the Martindales, Broadacres, Roman Lane and Centenary Road sites), but that other ‘second tier’ settlements with Neighbourhood Plans in the making have not sought to accommodate anything like as many of the 1500 (eg. Upper Beeding, Storrington: HRA Screening Report, p. 10). Although in justification of the AECOM figure it is claimed that, though ‘Southwater has expanded rapidly in recent years, nevertheless there is still a housing shortage’ (# 4.1), no explanation is given at this point as to what kind of shortfall exists or in relation to whom, ie. whether in the provision of “affordable” (social etc) housing arising from the identified need of local people, or in open-market “executive” homes resulting from the (potentially unlimited) demand of buyers from outside the District wishing to out-commute from here. It is moreover admitted that ‘the evidence that sits alongside this Plan... has flagged a number of matters that need to be addressed to make the level of development proposed acceptable’ (# 4.9), which presumably refers to the matters identified in the development pre-conditions listed in Policy SNP2.2, but no assurance is provided that these will actually be addressed in development proposals as eventually approved. It is similarly stated that ‘When providing additional homes it is important to consider the impact new residents would have on existing and planned infrastructure’ (# 4.10), but again no assurance is given that the impacts of a thousand additional residents can in practise be successfully mitigated or accommodated in terms for example of highways and sewage-disposal capacity. The updated SA/SEA claims that ‘The plan gives rise to very few cross-border effects’ (# 8.9), whilst admitting that ‘The exception to this being the allocation of land for a minimum of 422 new homes [which] is likely to give rise to additional pressure on the highway network and existing infrastructure and facilities’ (# 8.10). Although schools are cited as an example of such infrastructure no mention is made of sewage-treatment facilities which are likely to come under increased pressure also, at a time when Southern Water has been shown to have difficulty in coping even with existing sewage flows in West Sussex with serious consequences for watercourse quality (as recently reported by Ofwat). The SA/SEA further asserts that ‘this plan has sought to ensure that cross-border effects are minimised by requiring that required highway infrastructure is provided... and accessibility to Christs Hospital</p>
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Railway Station is improved' (# 8.10) - even though the Plan itself makes no proposals as to how vehicular Station access or highway capacity can be improved further - given existing physical constraints - without major new roadbuilding that developers are unlikely to fund.

Although the Plan claims that the housing allocation site identified in Policy SNP2.1 will 'Minimise harmful impacts on landscape compared to other options' (# 4.11), it is questionable whether it would in fact do so, given the way in which it would extend suburban development well beyond the existing settlement boundary into the surrounding countryside and, not being thus 'contained within an existing defensible boundary', whether it would satisfy all of the HDPF conditions for settlement expansion (cf. Strategic Policy 4.5). It is moreover admitted that in the case of the proposed site 'there are a number of constraints present (including a Listed Building, Ancient Woodland and a Local Wildlife Site) which constrain the developable area' (# 4.12), despite which it is still considered capable of accommodating up to 450 new dwellings, notwithstanding the negative impacts upon the noted heritage and natural assets resulting from their proximity to them. Thus as regards the Courtland Wood Ancient Woodland and Local Wildlife Site, the SA/SEA admits that 'careful planning would therefore be required to ensure negative impacts are avoided' (pp. 33-34), in respect of which Policy SNP2.2(b) stipulates that development proposals 'should provide the requisite buffer around' - though experience indicates that woodland located close to new housing is likely to suffer long-term deterioration as a result of increased human access and wildlife losses from pet depredation. As regards listed buildings, the SA/SEA admits that the site 'forms the setting of Great House Farmhouse... and [so it] would be hard to avoid negative impacts' (p. 35), but Policy SNP 2.2(h) proposes only to 'conserve elements of its setting that contribute to the significance' of the Farmhouse, principally by retaining as open land 'Parcels of land to the north and south of the listed building', whereas the most important perspective of its setting from which the significance of the Farmhouse is currently appreciated is surely from Worthing Road to the east. It is therefore to be doubted whether Policy SP2 yet satisfies NPPF requirements that 'Any harm to, or loss of, the significance of a designated heritage asset (from... development within its setting), should require clear and convincing justification' (para. 194), and that plans should 'safeguard... locally-designated sites of importance for biodiversity... and areas identified by national and local partnerships for habitat management' (para. 174(a)).

What improvements or modifications would you suggest?

It is not explained why, in order to be in 'general conformity' with the strategic policies of the HDPF (# 4.7), the Plan must adopt the housing figure produced by a single consultancy (which may also act on behalf of housing developers); and therefore a further report should have been commissioned from an independent source in order to corroborate the findings of the first, not only in order to determine whether a different level of development would be feasible but also a different distribution (eg. to smaller sites within existing settlement boundaries).

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

Do you wish to be notified of the local planning authority's decision under Regulation 19 of the Neighbourhood Plan (General) Regulations 2012 (as amended) in relation to the Southwater Neighbourhood Development plan?

Please tick here if you wish to be notified: