



**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](mailto: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.

<b>PART A</b>	<b>Your Details</b>
Full Name	
Address	
Postcode	
Telephone	
Email	
Organisation (if applicable)	
Position (if applicable)	
Date	2/7/2019

## PART B

To which part in the plan does your representation relate?

Paragraph Number:	Sustainability Appraisal Southwater Landscape Sensitivity and Capacity Study Site Assessments Built Up Area Review	Policy Reference:	SNP1 SNP2 SNP4
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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><b>Please give details of your reasons for support/opposition, or make other comments here:</b></p> <p><b>SNP1 – Core Principles</b></p> <p>One of the Core Principles is that the Parish will remain a single centre and that any development of 10 or more units should be within 15 minutes' walk of Lintot Square. This is not considered to be a sustainable approach as Southwater does not have sufficient services and business opportunities to realistically support the existing settlement as well as the growth forecasted over coming years. It is not reasonable to consider that Southwater centre will fully provide for the needs of the future residents, particularly in light of the lack of a train station. Many residents will rely on Horsham for business opportunities, access to shops and services as well as Horsham Station or Christ's Hospital's station to access employment and facilities elsewhere. Focusing all the development for the Neighbourhood Plan period next to Southwater, rather than nearer Horsham is therefore not considered to be sustainable.</p> <p>Another Core Principle states that Southwater will only grow outside its settlement boundary in accordance with policies in the Development Plan. This fails to acknowledge that Horsham District Council are currently considering new settlement boundaries across the District as part of the Issues and Options stage of the Local Plan review. One of the proposed new settlement boundaries is at Tower Hill, defining it as a 'Secondary Settlement'. It is noted that Southwater Parish Council objected to Tower Hill becoming a secondary settlement in the consultation process, however the overwhelming majority of consultation responses were in favour of a secondary settlement at Tower Hill. The Issues and Options assessment recommends that Tower Hill is adopted as a Secondary Settlement. The assessment acknowledges that the location, just 1.4km outside Horsham's town centre (i.e. closer than North Horsham is to the town centre) and access to strong transport networks make it a suitable location for some growth. It states 'Tower Hill is located to the west of the Worthing Road between Horsham and Southwater. Both of these settlements contain a range of services and facilities. Horsham being the main town within the district, thereby providing strategic level facilities together with a range of employment opportunities. Although a low-density development, the form of the settlement contributes to a sense of place.' This indicates that the Council's</p>
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long-term strategy is likely to include an element of growth in Tower Hill but this is not addressed in the Neighbourhood Plan. In light of Southwater's lack of train station, this appears to be short-sighted in terms of sustainable transport links.

#### **SNP2 – Allocation for Residential Development**

SNP2 allocates land to the west of Southwater to provide 422 - 450 residential units and concludes that development of this area will have the least negative impacts on the Parish itself. One of the requirements of the development is it must improve/upgraded pedestrian and cycle routes to Christ's Hospital Railway Station. Christ's Hospital School is the main employer in the Parish and the Christ's Hospital Railway Station is the nearest station to the centre of Southwater. The proposed allocation is however a significant distance from Christ's Hospital and it is therefore likely that there will continue to be a heavy reliance on private cars to access the station and the school. It is recognised that the proposed site is a suitable location for a large portion of the proposed development in the Parish, however it is not considered that a site so detached from a train station should be the sole location of housing provision in the Neighbourhood Plan. The land at sites 9 and 13 could provide the opportunity for a pedestrian flyover to provide safe crossing over the A24. This would mean residents could access Christ's Hospital station on foot in approximately 10 minutes which would be much quicker than travelling from Southwater centre.

There are also concerns regarding a single development being relied upon to bring forward all the housing requirements of the Neighbourhood Plan. The housing requirements for this Neighbourhood Plan are relatively high and a single site is therefore considered inappropriate. If the site is slow to deliver, or fails to deliver altogether then there is no considered alternative, meaning the Plan lacks flexibility and has a higher change of failing to meet housing targets than if a range of sites were allocated. Having all the development in a single location, combined with the already allocated Local Plan site, means there will be significant pressures on the immediate highway network. The highway implications could be severe and therefore fail to meet the requirements set out in the NPPF. This is further exaggerated by the lack of a nearby train station to offer an alternative model of transport. Extensive infrastructure upgrades are required as part of the housing delivery in this location and therefore there is likely to be a significant delay before the development will be deliverable. This will mean delivery is backloaded to the later part of the Plan resulting in a potential housing shortfall in the interim.

#### **SNP4 – Keeping Our Roads Moving**

SNP4 addresses roads and traffic. It states that where major development is proposed it must be demonstrated that it will not result in an unacceptable increase in road congestion at peak hours, particularly around the two roundabouts on the A24 within the parish. The main allocation is however on a site which is very much detached from any train station. This significantly limits the ability to avoid the use of a private vehicle for commuting purposes for anyone working outside the immediate area. Having a single location for the entire allocation also means that vehicle movements at peak times will be heavily concentrated. Sites near to Tower Hill (just outside of Horsham) and Christ's Hospital have however oddly been considered unsuitable for development, despite their access to a wider range of services in Horsham and their proximity to a train station. The access to the Christ's Hospital train station for all residents of Tower Hill could be significantly enhanced by a pedestrian flyover allowing safe passage across the A24 on foot to the station and also benefit the many pupils of Christ's Hospital School, when walking into Horsham town centre.

This is not just an issue for those in education and employment, but also the older population. Circa 72 C2 units are proposed in the Neighbourhood Plan, demonstrating the need for care facilities for the elderly. These should be located in areas that have good transport links, particularly to a train network to allow for quality care workers to commute to work in a sustainable manner and to encourage visitors to avoid travelling by private car.

#### **Sustainability Appraisal**

Option 3 of the Draft Sustainability Appraisal reviews the option of the expansion of Tower Hill, however it only included sites 1 and 2. It discounted this option as it stated that these sites could not deliver the full housing requirement of 460 units however this fails to recognise that in total 7 sites were submitted in the Tower Hill area which would be more than sufficient to meet the OAN.

### **Southwater Landscape Sensitivity and Capacity Study**

The assessment of this area, which incorporates Sites 9 and 13, concludes that landscape value is 'medium', as it only provides a local value. It also states that landscape susceptibility and sensitivity are both 'medium', meaning some development could be achieved without a damaging impact. It states that the area is well enclosed and that some limited development opportunities may exist where visual effects would be minimal. We would agree with these comments but consider that in light of the enclosed nature of the area with mature wooded boundaries that development in this location could be more substantial without causing significant landscape harm. Sites 9 and 13 cannot be seen from any adjacent public roads and this should be given great weight when assessing landscape sensitivity.

### **Site Assessments – Sites 9 and 13**

The assessment accepts that site 9 is sustainable in terms of location in accordance with the NPPF due to the proximity to Horsham. It does however state that it is not well related to the existing urban area and would be fairly isolated. Given the close proximity to both Horsham, Christ's Hospital and Southwater, as well as the existing development in Tower Hill itself, it is not considered appropriate that this site be determined as isolated. This assessment also fails to acknowledge that Tower Hill is likely to have its own settlement boundary shortly, based on the proposal in the Horsham Issues and Options Local Plan document which suggests Tower Hill should be a 'secondary settlement' with its own built up area boundary. Based on the positive consultation comments on this matter there is a good chance that this proposal will be retained in the emerging Local Plan. This would therefore mean that the site is not poorly related to existing boundaries and would not be isolated.

In relation to pedestrian access it states that access would only be onto Two Mile Ash Road but that there are no pavements on this road. There is however a pavement from the entrance of site 9 north to Horsham. Further, the site has been promoted in association with adjoining land to the south known as Griggs, Tower Hill, site 13. An indicative layout has been prepared and submitted to the Neighbourhood Plan as part of the original consultation to demonstrate how the joined-up development could work. This would therefore mean that Site 9 in addition to the footpath along its northern boundary and the bridleway along its western boundary, would also benefit from access to the footpath accessible from site 13, which leads to Christ's Hospital Station and which could provide the opportunity for a pedestrian flyover to provide safe crossing over the A24. This would mean residents of Tower Hill could access Christ's Hospital station on foot in approximately 10 minutes which would be much quicker than travelling from the centre of Southwater.

The assessment reviews the site in respect of the relevant LCA from the Southwater Landscape Sensitivity and Capacity and states that the site is well enclosed and that some limited development opportunities may exist where visual effects would be minimal. We would agree with these comments but consider that in light of the lay of the land and enclosed nature of the site with mature wooded boundaries that development in this location could be more substantial. Sites 9 and 13 cannot be seen from any adjacent public roads and this should be given great weight when assessing landscape sensitivity.

The heritage assessment states that development in this location could have a detrimental impact of Sawyerland, a Grade II listed building. Sawyerland is physically detached from the proposed site and perceived impact to the setting could easily be mitigated. The proposed allocation site also has a listed building and impact has been suggested to be mitigated through a 100m landscape buffer. This would also be achievable in the location of site 9 to resolve concerns about any impact on the heritage asset.

The assessment accepts that site 13 is sustainable in terms of location in accordance with the NPPF due to the proximity to Horsham. It does however state that it is not well related to the existing urban area and

would be fairly isolated. Given the close proximity to both Horsham, Christ's Hospital and Southwater, as well as the existing development in Tower Hill itself, it is not considered appropriate that this site be determined as isolated. This assessment also fails to acknowledge that Tower Hill is likely to have its own settlement boundary shortly, based on proposal in the Horsham Issues and Options Local Plan document which suggests Tower Hill should be a 'secondary settlement' with its own built up area boundary. Based on the positive consultation comments on this matter there is a good chance that this proposal will be retained in the emerging Local Plan. This would therefore mean that the site is not poorly related to existing boundaries and would not be isolated.

In relation to pedestrian access the assessment states that the site benefits from a footpath and bridleway but that these do not connect directly to the main highway network, limiting their usefulness. It states footways would need to be provided to connect the site to the wider network. Existing public footpaths that have been disconnected by the A24 could be reconnected using this land. This would benefit the existing Tower Hill residents as well as new residents resulting from the new development. The requirements of the proposed allocated site require significant upgrades to existing pedestrian networks in order to be acceptable. It is therefore considered that such upgrades could equally be applied to site 13 and 9 to meet this requirement. In addition to the footpath along site 9's northern boundary and the bridleway along its western boundary, the footpath accessible from site 13, which leads to Christ's Hospital Station could provide the opportunity for a pedestrian flyover to provide safe crossing over the A24. This would mean residents of Tower Hill could access Christ's Hospital station on foot in approximately 10 minutes which would be much quicker than travelling from the centre of Southwater.

The assessment states that the site is not achievable due to access being required through the neighbour's land, however the owners of sites 9 and 13 have worked together since the first stages of the Neighbourhood Plan to jointly promote the sites and have submitted a comprehensive layout incorporating both sites. It is therefore considered that development in this location is achievable.

**Built- Up Area review**

The document does not consider the review, ie. introduction, of a built-up area boundary in Tower Hill. This is considered most unusual in light of the recent positive consultation on the proposed introduction of a built-up area boundary at Tower Hill in the Horsham Issues and Options Local Plan document. This document appears to overlook this proposal from the Council.

**What improvements or modifications would you suggest?**

As above

(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: