



**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:	1.9	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

Please give details of your reasons for support/opposition, or make other comments here:
<p>It is my contention that the Neighbourhood Plan as submitted does not meet certain of the ‘basic conditions’ stated at paragraph 1.9 (contrary to the claims of the accompanying Basic Conditions Statement).</p> <p>Firstly, the Plan does not have regard to national policies and advice contained in guidance issued by the Secretary of State, which not only includes the National Planning Policy Framework (NPPF), but also Planning Practise Guidance (PPG). Although the NPPF does not explicitly reserve to local planning authorities (LPAs) responsibility for such ‘strategic policies’ as those concerned with housing development distribution (cf. para. 20(a)), that it in fact does so may be inferred from its Glossary (Annex 2) whereby LPAs alone are described as ‘strategic policy-making authorities’ responsible for producing strategic policies (including site allocations). That the NPPF does not envisage that neighbourhood plans should make housing allocations on the scale proposed by Plan Policy SNP2 may also be inferred from its stipulation that ‘Neighbourhood planning groups should [like LPAs] consider the opportunities for allocating small and medium-sized sites ([no larger than one hectare]) suitable for housing in their area’ (para. 69). Further guidance is provided by PPG paragraph 101, which provides that: ‘in setting out requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or assets of particular importance (as set out in NPPF para. 11 fn. 6), which may restrict the scale, type or distribution of development in a neighbourhood plan area’; in the case of Southwater, such assets and areas would clearly comprise the Grade II* Listed Great House Farmhouse and the Courtland Wood SCNI/LWS, which otherwise stand to be negatively impacted by Policy SNP2. It cannot therefore be claimed that the Plan is in conformity with NPPF provisions that require plans to ‘safeguard... locally-designated sites of importance for biodiversity... and areas identified by national and local partnerships for habitat management’ (para. 174(a)), or stipulate 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’ such that ‘Substantial harm to... assets of the highest significance, notably... grade I and II* listed buildings... should be wholly exceptional’ (para. 194).</p> <p>Secondly, the Plan does not contribute to the achievement of genuinely sustainable development, in that whilst it may well contribute to what the NPPF describes (# 8) as the three ‘overarching objectives’ of the planning system, these are stated as comprising economic and social as well as environmental objectives (in that order), whereas the universally-accepted UN definition cited (# 7) requires development to be environmentally sustainable. Consonant however with an approach that seeks to ‘secure net gains across each of the different objectives’ (ie. trade off</p>

economic benefits against environmental costs), UK Government guidance allows the Strategic Environmental Assessments required by EU law to be incorporated in Sustainability Appraisals that similarly “balance” economic and social factors against the required environmental considerations; hence it is a simple matter for the Basic Conditions Statement to confidently claim (# 3.5) that ‘the SA/SEA demonstrates that the Plan will positively contribute towards sustainable development’.

Thirdly, the Plan is not in general conformity with the strategic policies contained in the existing development plan for the area, principally the Horsham District Planning Framework (HDPF - the local plan), Appendix A of which defines a ‘Strategic Site Allocation’ to be a ‘location for development of around 200 homes or more’, adding that ‘Site specific details are specified within policies in the... Framework’. The single site proposed by Plan Policy SNP2 for 420-plus homes thus clearly falls within the HDPF definition of a strategic housing development, but is not contained in any of the HDPF strategic policies that specify the sites for such developments - in particular (as regards Southwater) Strategic Policy SD10. Whereas the Basic Conditions Statement sweepingly asserts (# 4.6) that Plan Policy SNP2 achieves ‘complete conformity’ with several HDPF strategic policies (‘1, 2, 3, 4, 12, 13, 15, 16, 18, 32, 39, 42’), its only reference to SD10 simply states that ‘The SNP does not impact this allocation made at the strategic level’ (# 4.5). Moreover, though denying that the size of the Policy SNP2 allocation makes it ‘strategic’, the Statement does not explain why ‘this is not the case’ (# 2.5), and does not therefore answer my contention that what SNP2 proposes is essentially a strategic housing allocation that should properly be determined at District-level in accordance with both the local plan and national planning policy guidance.

What improvements or modifications would you suggest?

The scale of the housing allocation proposed for the single site identified in Plan Policy SNP2 should be reduced in order to bring it below the threshold for a Strategic Site Allocation under the HDPF, and also to reduce the negative impact of additional new housing on both the ecology of Courtland Wood and the setting of Great House Farmhouse; it is submitted that this reduction could be achieved by making use of smaller sites within the existing settlement boundaries of Southwater and Christ's Hospital, as indeed is stated to be a priority by the HDPF itself (# 4.8).

(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 to be notified: