



Horsham District Council

8th June 2011

To: Councillors:

John Bailey; Malcolm Curnock; Brian Donnelly; David Holmes; David Jenkins;
Elizabeth Kitchen; Gordon Lindsay; Sheila Matthews; Godfery Newman;
Claire Vickers

Strategic Planning Advisory Group
14th June 2011, 5.30pm, Council Chamber

You are invited to attend the Strategic Planning Advisory Group meeting to consider the items set out below.

If you are unable to attend the meetings please advise Natasha Robinson by email or on (01403) 215398 so that your apologies may be recorded.

All Members of the Council are invited to attend these meetings; those wishing to speak may do so by prior agreement with the Cabinet Member for Living and working Communities.

The purpose of this meeting will be for Members to have an update on the consultation responses to the Draft Interim Statement and revised Statement of Community Involvement, also on other work being undertaken on the Local Development Framework.

Ian Howard
Cabinet Member for Living and Working Communities

Strategic Planning Advisory Group – 5.30pm

Agenda

1. Apologies for absence
2. Notes of previous meeting: 8th February 2011 SPAG (attached)
3. Draft Interim Statement: Managing Development in Horsham District and Draft Statement of Community Involvement - consultation feedback (report attached).
4. Revised Statement of Community Involvement - consultation feedback (report attached).
5. Planning for Traveller Sites consultation – report attached.
6. Local Development Framework work update (oral presentation)
 - Localism Bill Proposed Changes
 - The Future Prosperity of Horsham Project - Draft Town Centre SPD - oral update
 - Relaxation of planning rules for change of use from commercial to residential' consultation - oral update
7. Dates of Next Meetings:
 - 26th July 2011
 - 27th September 2011
 - 8th November 2011
 - 31st January 2012
 - 13th March 2012
8. Any other items of business that the Cabinet Member for Living and Working Communities wishes to raise.

Strategic Planning Advisory Group
Notes from
22nd March 2011, 5.30pm, Council Chamber

Attendees: John Bailey; Leonard Crosbie; David Holmes; Ian Howard; Gordon Lindsay; Sheila Matthews; Claire Vickers; Leonard Warner

Jonathan Chowen; George Cockman; Sheila Van Den Bergh; Christian Mitchell

1) Apologies for Absence: Sheila Dale

2) Notes of previous meetings: 8th February 2011 (attached to agenda)
Agreed

3) Draft Interim Statement: Managing Development in Horsham District and Draft Statement of Community Involvement Consultation update (oral update)

The Draft Interim Statement was published on the 21st January 2011 for an eight week period of consultation that closed on the 18th March 2011. Currently there are approximately 240 representations online, with a further 50 letters that Officers need to enter onto the consultation website. Several of the comments received relate to aspects of the Sustainability Appraisal/Strategic Environmental Assessment of the Draft Interim Statement.

The 'What are your priorities' leaflets were delivered to all dwellings within the Southwater and Billingshurst Parishes on the weekend of the 22nd January. To date Officers have input 1300 questionnaire responses from Southwater and 300 responses from Billingshurst. There are currently an additional 200 questionnaires, which contain a mixture of Southwater and Billingshurst, that remain to be inputted.

There were six exhibitions in total; two at Billingshurst Village Hall, two at Southwater Parish Offices and two at the District Council Offices. Approximately 200 people attended each of the Billingshurst exhibitions; there were in excess of 300 people to the Southwater exhibitions; and, several attendees to each of the exhibitions at the Council Offices.

Councillor David Jenkins, Cabinet Member for Strategic Planning and Barbara Childs, Spatial Planning Manager also attended one of the Southwater Parish Council meetings along with representatives of Keep Southwater Green, Southwater Community Partnership and Berkeley Homes. There were approximately 150 members of public at the meeting, which consisted of two hours of questions after a short presentation from each representative. Councillor Claire Vickers thanked David and Barbara for attending the Parish Meeting.

A full analysis of representations received will be reported to Members at the next Strategic Planning Advisory Group on the 14th June 2011.

4) Southwater Parish Design Statement (report attached to agenda)

The Southwater Parish Design Statement sets out a vision for the future of Southwater and provides guidelines to assist developers, planners, architects and members of the public wishing to build or renovate properties. The aim is to encourage high quality design whether for a small house extension or a large housing or commercial development.

The Design Statement has undergone an extensive period of local public consultation. The document has been agreed by the Parish Council and formally submitted to Horsham District Council on 1st December 2010. Horsham District Council subsequently sent the document out for a six week consultation which ended the 25th February 2011.

Members were asked to consider the content of this report to enable them to make comments and approve the Parish Design Statement before it is presented to Cabinet on the 24th March 2011. If agreed by Cabinet, the Supplementary Planning Document will be formally adopted and published by Council on the 8th April 2011, and will form part of the Local Development Framework.

Local Councillors were pleased to see the document come together with the involvement of so many different groups from the Parish; it was very good to see the community working together. However, Members also raised concerns in relation to the content of Design Statements; Forest Neighbourhood Council felt that they were given different guidance and advice when writing their Design Statement. Members asked and assurance was given that the Strategic Planning Team treat all Design Statements in the same way and provide clear advice to the Parish and Neighbourhood Councils. Officers advised that many of the current Design Statements are several years old; Parish and Neighbourhood Council's are welcome to contact the Strategic Planning Team if they feel their Design Statement needs to be reviewed.

Councillors queried if the Planning Inspectorate take Design Statements into account when dealing with an appeal. It was confirmed that Design Statements are adopted as Supplementary Planning Documents and as such do hold some weight at appeal. Officers also advised that Design Statements will play a far more vital role with the implementation of the Localism Bill. The preparation of Parish Plans and Design Statements are one way in which the communities get involved with Local Authorities and the planning process.

5) The Future Prosperity of Horsham: Town Framework Report (presentation)

Officers gave a PowerPoint presentation at the meeting providing Members with an update in to The Future Prosperity of Horsham report. Copies of the presentation are available on request from the Strategic Planning Team. A full copy of the final report is available to view on the Local development Framework website.

Consultants, Urban Practitioners were commissioned in Summer 2010 to undertake a study with a view to producing an overarching framework for the town to guide and pro-actively encourage future retail, commercial and leisure development. The study focuses on three areas of the town; Horsham Town Centre, Broadbridge Heath Quadrant and Hurst Road (including the station goods yard). The content of the report will be fed into a Supplementary Planning Document (SPD).

The Future Prosperity of Horsham project is a Council led initiative to build on the strengths of Horsham Town into the future. It is a cross-cutting project involving a wide range of Officers and partner organisations with the aim to steer future development for the continued benefit of residents and visitors alike. The Town Framework Report is a background document to the Core Strategy Review and will be included in the Local Development Framework evidence base. However, it should be noted that the report itself is not policy and only sets out potential opportunities to aid the production of planning guidance documents that will be produced as part of the ongoing Future Prosperity of Horsham Project.

It is proposed that the Horsham Town Plan, which will draw out important principles of development for the town centre, will be subject to public consultation in Summer 2011. The Broadbridge Heath Quadrant guidance document will be produced later this year.

Overall Members felt that the Town Framework Report was a good document and stated that they are looking forward to the Horsham Town Plan. However, Members were concerned that Officers were aiming to consult on the Town Plan so soon after the Elections in May. It was felt that the timescale would be too short for Officers to complete the document and also that there would be very limited time for elected Members to consider the document if it were to be discussed at the next SPAG in June. Officers advised that the term 'Summer' was seasonal and therefore it may be appropriate to discuss the document at a later SPAG meeting. It was also explained that due to the content of the Town Framework Report, Officers are able to move forward with the production of this Supplementary Planning Document which will be reported to SPAG for discussion before it is published for consultation.

Councillor David Jenkins, Cabinet Member for Strategic Planning recommended that a Working Group be set up which will consider the Future Prosperities work, separate to the Strategic Planning Advisory Group. Members were advised that Chris Carey, Strategic Land & Property Manager will lead all future work in relation to the Future Prosperity of Horsham project. Members agreed, but did raise concerns, due to the importance of the project, that it was being moved to a separate Department from the Strategic Planning Team, the work so far the Members had been very happy with. Councillors requested that the Working Group look at ways to improve the 'Gateways' to the town; it is important that people entering Horsham town start with a good impression. Officer noted Members request.

6) Local Development Framework Update (oral update)

The Draft Statement of Community Involvement (SCI) has been discussed with Members at previous SPAG meetings. The document has been subject to a public consultation which ran from 21st January 2011 and closed on the 18th March, alongside the Draft Interim Statement; only a handful of comments have been received in relation to the SCI. In order to target hard to reach groups Officers attended various meetings such as the Older Persons Council and HYPER. Officers advised Members that the Government has stated it is looking to merge certain Local Development Framework documents such as the Local Development Scheme (LDS), Annual Monitoring Report (AMR) and SCI considering the contents of the Localism Bill. Officers will update SPAG once further information is received.

7) Dates of Next Meeting:

14th June 2011

26th July 2011

27th September 2011

8th November 2011

31st January 2012

13th March 2012

Noted

8) Any other items of business that the Cabinet Member for Strategic Planning wishes to raise

Due to the future Elections in May, Councillor David Jenkins, Cabinet Member for Strategic Planning thanked Members for attending all of the Strategic Planning Advisory Group's to date.

Councillor Holmes advised that he had been in contact with a Member of Parliament in relation to the recent Government statement that empty employment buildings should be considered as being suitable for housing. The response received was that each Local Authority will have to define what the communities would like to do in the production of Neighbourhood Plans. Councillors felt that there was great uncertainty in relation to this issue; some sites may be suitable, however, it should not be considered a 'free for all' as many sites are valuable employment space. Officers confirmed that the adopted Local Development Framework documents protect sites of employment. However, they also provide some flexibility to Change of Use applications.

Strategic Planning Advisory Group

14th June 2011

Agenda Item 3

Draft Interim Statement: Managing Development in Horsham District

1. Introduction

1.1 The Draft Interim Statement was prepared for consultation, following consideration at the Strategic Planning Advisory Group on 27th July 2010, to address the short term delivery of housing in Horsham District. The Draft Interim Statement and the approach it encompasses, seeks to address the short term delivery of housing in Horsham District. It was considered by the Strategic Planning Advisory Group on 23rd November 2010 before being recommended to Council to be approved for consultation in early 2011 for an 8 week period.

1.2 The consultation enabled the wider community as well as stakeholders to consider and comment on the Draft Interim Statement over the 8 week period from the 21st January to the 18th March. These comments have been considered and are contained within this report for your consideration before any further decisions are taken on the document and the way forward.

2. Background

2.1 As set out previously and in the Draft Interim Statement itself, for a number of reasons, housing has not come forward to meet required needs in recent years. This together with recent national political change has affected the work on and delivery of policy documents, and led to a need to re-consider the Council's position - particularly on housing supply. The Draft Interim Statement was recommended for consultation in order to address the short term delivery of housing and maintain a plan-led approach to delivery of housing and associated infrastructure in the District.

2.2 Unlike other Councils that have stopped work on their Local Development Frameworks, it was considered that the Council should maintain control of development proposals in order to not only understand the needs of the community but ensure that they are properly addressed. This would help to

ensure that the most suitable development takes place in the most sustainable locations in the District, bringing forward community facilities and the necessary infrastructure to benefit the existing as well as the new community. It was therefore considered necessary to prepare the document in discussion with local communities and other interested parties, embracing the 'localism' agenda. Wider consultation would then enable the Council to better understand needs and aspirations of the community.

3. Draft Interim Statement

3.1 The Interim Statement approach, as set out in the consultation document, seeks to ensure that ad-hoc housing proposals deemed unsuitable by the Council could as far as possible be refused and the communities across the District consequently having greater certainty as to when and where development would come forward.

3.2 The Draft Interim Statement was prepared on the basis of the housing requirements of the South East Plan and the vision, objectives and development strategy of the adopted Core Strategy (2007), which focuses on development in or adjacent to the most sustainable settlements. It also refers to more recent work on housing needs in a way that seeks to minimise the environmental impact of development and provide the necessary infrastructure.

3.3 The Draft Interim Statement was accompanied by a number of Appendices which provided detail on specific areas, including options for development in Billingshurst and Southwater. The Draft Interim Statement and Appendices also referred to a number of background documents which could also be viewed on the Council website. The Draft Sustainability Appraisal of the Draft Interim Statement was also consulted on, alongside the Draft Interim Statement, which identifies the impacts the document may have on a range of environmental, economic and social issues, and makes recommendations as to how these impacts could be prevented or minimised.

3.4 The Council identified land through the Draft Interim Statement for homes to bridge the gap between those allocated in the Core Strategy (2007) and the Core Strategy Review. This document set out three options for consultation. The implications, risks and opportunities of these options were set out for consideration. The three options can be summarised as follows;

Option One: No Planned Growth

- This does not mean 'no development'. In this option the Council would need to respond to ad-hoc housing proposals submitted by developers, over several years. If not enough sites are given permission by the Council, sites will be lost through appeal against Council and community wishes in order to meet the minimum of five year supply of housing land under the South East Plan requirements or the Core Strategy.

Option Two: Limited Planned Growth

- The second option is to bring forward development through an Interim Statement approach of c500 homes and associated development on two separate sites, one in Billingshurst and one in Southwater. This would contribute towards meeting the District's housing requirements for the shorter term but would mean that the Council would have to respond to ad-hoc development proposals across the District in addition to this planned growth. The option two proposals would bring limited facilities to these settlements, as set out in Appendices 4 and 5 of the Draft Interim Statement as well as further sites, possibly elsewhere in these towns and across the District. The settlements would also need to be reconsidered as part of the work on the Core Strategy Review.

Option Three: Notably Planned Growth

- The third option is to bring forward development of c1000 homes, necessary infrastructure and community facilities on two separate sites, one in Billingshurst and one Southwater. This would bring opportunities to meet identified community needs and aspirations alongside homes (set out in Appendices 4 and 5 of the Draft Interim Statement). This option would endeavour to ensure that development is planned for in the District with only a small number of additional sites needing to be granted planning permission in the shorter term in order to meet fully the requirements of the South East Plan. It is envisaged that a scheme of c500 units would facilitate the safeguarding of the larger sites in the two settlements for a period of time.

- 3.5 The Draft Interim Statement set out the full background and reasons for producing the document for consultation. Appendix One of the Draft Interim Statement details the housing land supply position for the District and explained how the different options identified in the document would contribute towards the housing requirements for the District considering the current position and longer term programme for the production of the Core Strategy Review.
- 3.6 The South East Plan sets the housing requirements for the District, but the Council also monitors the housing targets contained in the adopted Core Strategy (2007). The position against both the South East Plan and adopted Core Strategy are reported through the Annual Monitoring Report which is published in December each year. The housing monitoring is based on the requirement for the Council, inline with requirements set out in National Policy Statements, to report on the five year supply of housing land. Inspectors are continually reviewing this information when determining applications and applying the tests in the *Planning Policy Statement 3: Housing* if the local authority is lacking in this requirement.
- 3.7 With the revised timetable for the Core Strategy Review, the Interim Statement was designed to offer increased certainty and help to meet the need for housing between the Core Strategy (2007) and the Review. The Interim Statement would contribute not only to the short term, but also to the medium term transitional period between the Core Strategy and Review, balancing the necessary flexibility, as required by the Inspectors Report, with the increased certainty provided by a plan-led approach and the benefits that such an approach delivers.
- 3.8 Appendix One of the Draft Interim Statement set out that housing monitoring up to the production of the Draft Interim Statement indicated that the five year supply of housing, against the South East Plan, was 73% or 1218 dwellings below the requirement. At the time of the production of the draft document, monitoring against the Core Strategy (2007) indicated that the Council had a five year supply of housing land. However over the period until the Core Strategy Review would be in place and delivering homes, there would be a shortfall of 111 dwellings. Both these figures have no flexibility for delivery changes to those expected as set out in the Annual Monitoring Report.
- 3.9 One of the main reasons for producing the Draft Interim Statement was to provide flexibility over the short term, but also to indicate the Council's position in respect

of preferred locations of development to contribute towards housing requirements during the transitional period between the Core Strategy (2007) and the Core Strategy Review. The South East Plan targets are currently still in place, but the Government has reiterated its intention to abolish Regional Strategies. The Interim Statement Option 3, whilst requiring some additional sites, was consulted upon as it has the potential to make a significant contribution towards the housing requirements contained within the South East Plan. In the longer term, the Government aims to allow Local Authorities to determine what level of housing provision is appropriate for their area, but this must be justified and capable of being defended during the Local Development Framework examination process. Work on this continues and will inform the production of the Core Strategy Review, programmed for adoption in 2013. The emerging evidence indicates a level that is not excessively dissimilar to the South East Plan. Discussion with communities through the Core Strategy Review, along with consideration of background evidence on employment, infrastructure, community and other needs as well as potential sites to meet delivery, social, economic and environmental impacts from housing requirement delivery will all be considered in setting the District's requirements for the longer term strategy.

3.10 At the time of its publication, it was considered that the Interim Statement would help the Council to proactively address housing requirements; including at whatever level they may be set in the future. An Interim Statement, looking to pro-actively address housing requirements, was considered to be the best planned approach and would help to offer a degree of certainty covering the transitional period until the Core Strategy (2007) is replaced by the Core Strategy Review. Whilst additional sites would still be required against the South East Plan requirements, against the Core Strategy (2007) an Interim Statement would offer the increased flexibility required by the Inspectors report, giving certainty to the community over a longer period of time.

3.11 It was made clear in the Draft Interim Statement that comprehensive development would bring forward as much community benefit as possible, which would be worked up in partnership with the community. A further requirement of the document was to ensure any scheme is feasible and viable and that the developer is committed to bringing forward the site in the shorter term.

4. Consultation and Comments Received

4.1 In order to maximise the response to the consultation on the Interim Statement.

The Draft Interim Statement was out for consultation at the same time as the Revised Statement of Community Involvement. A number of initiatives were used to gain the public's interest in the consultation and invite comments to be made. An advertisement, outlining the consultation, was placed in the West Sussex County Times and news items and links to documents were placed on the Council's website and the dedicated Local Development Framework website for the duration of the consultation period. Press releases were also sent out to a variety of local media sources including other local papers and radio stations. Press briefings and questions were requested throughout the consultation.

4.2 Posters as well as large banners, outlining the consultation, were distributed to Billingshurst and Southwater Parish Council's to display as they wished around their settlements.

4.3 The Draft Interim Statement consultation ran for a total period of eight weeks beginning Friday 21st January 2011 and ending Friday 18th March 2011. The above period of consultation exceeded the length of time set out under any formal or informal consultation for Local Development Framework documents in the adopted Statement of Community Involvement 2007. The documents were made readily available to the public and stakeholders through the website, at libraries and help points, Parish Council offices as well as at the consultation events and the Council's main office in Horsham.

4.4 Letters or e-mails were sent to all those on the Local Development Framework database informing them of the consultation on the Draft Interim Statement. Similar letters and, where appropriate, documents, were also sent to all statutory consultees, as well as all Council Members, internal departments and officers; as well as the District Libraries and Help Points.

4.5 A Draft Interim Statement summary leaflet and questionnaire was developed in partnership with community organisations through the Reference Groups¹ for Billingshurst and Southwater. This was carried out in response to a suggestion at

1. These groups comprise representatives of each relevant Parish Council, local action groups, each Community Partnership, local Members and the Cabinet Member for Living and Working Communities. They discuss and consider the background work on sites and development proposals as part of the Core Strategy Review.

the Reference Groups as an additional method of capturing the Districts resident's views on the proposals. The leaflet and questionnaire was designed to provide an overview of the proposals together with information where further details could be obtained, including details of the public consultation events / exhibitions being held and how to make more detailed comments online through the consultation website. The questionnaire also sought to gain an understanding of public opinion on the proposals.

4.6 One leaflet was delivered to every household within the potentially affected Parishes of Billingshurst and Southwater, mostly by hand, over the first weekend of the consultation. Approximately 3,600 households within the Parish of Billingshurst and 3,900 households within the Parish of Southwater were sent a leaflet, with additional copies available from the Parish Councils, at the consultation events and the Council offices. The leaflet was also available to view and complete online through the Council's website.

4.7 In addition to the above, approximately 170 and 650 leaflets were sent out via Castlewood Primary School, Southwater and Billingshurst Primary School, Billingshurst, respectively. The Weald Community School and Sixth Form sent the leaflet through their electronic system to parents, staff and governors.

4.8 Consultation exhibitions were held in Billingshurst (2), Southwater (2) and in Horsham (2). Each event was led and represented by the Strategic Planning Team; however members of the Reference Groups were invited to be present at these events. The two events held in Billingshurst had representatives from Billingshurst Parish Council. The two events held in Southwater had representatives from Southwater Parish Council the local action group 'Keep Southwater Green' and Berkeley Homes. The two events held in Horsham had representatives from Southwater Parish Council and 'Keep Southwater Green'.

4.9 A further public event was held during the consultation period, arranged by Southwater Parish Council, and was attended by the Cabinet Member for Strategic Planning and the Spatial Planning Manager, as well as the other members of the Reference Group. At this event presentations were given and questions asked by the public audience were answered.

4.10 A number of methods of commenting on the Interim Statement were equally accepted, these were:

1. online through the consultation website; (Comments were particularly encouraged in this format)
2. on a comments form related to the document;
3. via an e-mail;
4. by letter, and/or
5. by completing the questionnaire.

4.11 More details on the consultation, advertising, consultation methods and availability of documents can be seen in the full consultation statement in Appendix 1.

Comments received during the consultation on the Draft Interim Statement

4.12 To encourage people to comment, particularly using the Council's online consultation website, various guidance documents were produced and made readily available. These included a Frequently Asked Questions paper which answered questions such as 'What is an Interim Statement?' A postcard was produced with the aim of promoting the making of comments through the consultation website, rather than using other methods. Finally, a step by step guide to registering on and then commenting through the consultation website was produced.

4.13 Comments received via the consultation website and by letter on the Draft Interim Statement are summarised in Appendix 2a, 2b and 3 attached to this report, and the results of the leaflet questionnaire can be seen in Appendix 4a and 4b also attached. The Consultation Statement, seen in Appendix 1, gives the full details the numbers of responses received on the Draft Interim Statement through the various forms of response. However to summarise, there were 277 representations submitted in total through the Council's consultation website, however 7 of these comments were inadmissible (eg duplicate comment) and 3 representations submitted directly related to the Sustainability Appraisal.

4.14 In addition to the representations made through the Council's consultation website, 286 letters were received. 42 of these letters have been uploaded onto the Council's online consultation website as permission has been granted to make the representations public. 15 have not been uploaded onto the Council's online

consultation website as permission to make the representations public was not given. The remaining 229 letters have also not been uploaded onto the Council's online consultation website as we have not received a response as to whether the representation can be made public. However when reviewing these letters, there are no further substantive comments which have not been previously raised by other letters received, as set out in Appendix 2a, 2b and 3. The majority of letters received related to Billingshurst and it is important to note that these mainly comprised a number of standard letters which had been signed and returned to the Council.

4.15 The total number of leaflet questionnaire responses received for Billingshurst was 303, following delivery of approximately 3600 leaflets to households in the Parish, further availability of the leaflet as set out previously and the ability to complete the questionnaire online. Of these responses 281 were received from people living within Billingshurst Parish and 22 from people living outside the Parish. This was a response rate of 8% of the leaflets delivered, or 3.4% of those living within the Parish based on West Sussex County Council population projections 2011 of 8,114 residents in the Parish.

4.16 The total number of leaflet questionnaire responses received for Southwater was 1,646, following delivery of approximately 3900 leaflets to households in the Parish, further availability of the leaflet as set out previously and the ability to complete the questionnaire online. Of these responses 1,494 were received from people living within Southwater Parish and 152 from people living outside the Parish. This was a response rate of 38% of the leaflets delivered, or 13.9% of those living within the Parish based on West Sussex County Council population projections 2011 of 10,698 residents in the Parish.

4.17 Only three comments were received that directly related to the Sustainability Appraisal of the Draft Interim Statement. In addition to these comments, a few additional representations were made on the sections of the Interim Statement that related to the findings of the Sustainability Appraisal. A total of 7 comments have been analysed and, if an Interim Statement is taken forward, will feed back into the production of the final Sustainability Appraisal.

4.18 Other comments attached in the online consultation website to other sections of the document were also analysed, the majority of these related directly to

Billingshurst and Southwater and so are summarised in Appendices 2a, 2b and 3. When reviewing these letters, there were some additional comments to those set out in the appendices, such as some detailed comments regarding the Locally Generated Needs Study which will be considered, comments on infrastructure needs and 'tipping points' of villages and delivery of facilities across the District, that housing requirements are a minimum not maximum requirement, several other sites being suggested for development as well as some support for the Interim Statement approach. However, no further substantive comments which have not already been raised by other letters received, as set out in Appendix 2a, 2b and 3.

5 Conclusions and Next Steps

- 5.1 Whilst the response rate to the consultation was very low in both settlements, particularly considering an advertisement in the form of a summary leaflet was sent to every household in the Parish, the overriding view of those people who did respond is that the Council should not plan for growth in the two villages of Billingshurst and Southwater but move forward with Option one as set out in the Draft Interim Statement. This would entail dealing with planning applications as they arise in these settlements and across the District.
- 5.2 Nevertheless there were a number of groups and organisations who responded expressing support for growth of these villages and the facilities that could be provided as a result of development, recognising the need for further development in the coming years. Members should note that comments from these groups represent a number of people who are members of that organisation.
- 5.3 It is intended that Members of SPAG consider the comments received during the consultation period on the Draft Interim Statement and the approaches open to the Council to manage development over the period from now until the Core Strategy Review is adopted, currently estimated in 2013.
- 5.4 Despite the low response rate to the consultation, it is considered that there are two options the Council could pursue; Option A would be to move forward to adopt an Interim Statement, taking into account the aspirations and issues from the comments received during the consultation including the questionnaire responses, planning short term development in the District proactively either at a

level identified in option two or option three as set out in the Draft Interim Statement.

5.5 Option B would be for the Council not to pursue an Interim Statement approach, (Option one in the Draft Interim Statement) and deal with planning applications as and when they are submitted. This would include applications for around 500 at both Billingshurst and Southwater following the developers consultations earlier this year with those communities, as well as other applications which may be received across the District.

5.6 Work will need to continue on the Core Strategy Review, and if option B is pursued it will be imperative for this work to move forward quickly due to the position the District would be placed in regarding housing land supply. As part of this work consultation will take place on setting the housing requirements for the District considering the Locally Generated Housing Needs Study and other evidence base work being undertaken.

5.7 Due to changes in Government and the background work needed to produce the Core Strategy Review, it is expected that the strategy will not be adopted until 2013. This will follow several stages of production including consultation.

5.8 Whichever option is recommended by the Member for Living and Working Communities having been informed by discussions at his Advisory Group, it is considered that despite the low rate of responses to the consultation (taking into account both the leaflet and other letters received) the leaflet will help give a clear steer on the aspirations of the community if development does come forward in the villages whether planned or unplanned.

Strategic Planning Advisory Group 14th June 2001
Agenda Item 3, Appendix 1

Draft Interim Statement: Managing Development in Horsham District and
Draft Statement of Community Involvement Consultation Statement

Introduction

Horsham District Council prepared a Draft Interim Statement: Managing Development in Horsham District hereafter referred to as Draft Interim Statement, for consultation to address the short term delivery of housing in Horsham District. Alongside this, Horsham District Council prepared a Revised Statement of Community Involvement (SCI), for consultation.

The Draft Interim Statement is being produced as a non-statutory document, outside the formal regime of the Planning and Compulsory Purchase Act 2004. As such it will not attract the statutory status of being part of the Development Plan and will not benefit from the terms of s.38 (6) of the 2004 Act.

The Revised SCI, however, is being produced as a statutory document and has, therefore, been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 (and updated 2008 and 2009).

Notwithstanding the above, this Consultation Statement indicates the consultation and involvement Horsham District Council has undertaken for both the Draft Interim Statement and the Revised SCI, which has far exceeded the minimum requirements for the early consultation process on Local Development Framework (LDF) Documents and the SCI.

Although not part of the formal consultation stage, during the preparation of the Draft Interim Statement and Revised SCI, a number of internal consultations took place to inform the content of the documents. Reference Groups were also set up in the two potentially affected communities of proposals in the Draft Interim Statement of Billingshurst and Southwater. These groups were chaired by the Cabinet Member for Strategic Planning, Officers from the Council and representatives from the Parish Council, local Action Group and other specific local groups such as the community partnership if agreed by the group.

Consultation

The Draft Interim Statement and Revised SCI consultation ran for a total period of eight weeks beginning Friday 21st January 2011 and ending Friday 18th March 2011. The above period of consultation exceeded the length of time set out under any formal or informal consultation for LDF documents in the adopted SCI 2007.

1. Availability of consultation material

The documents and associated material, including the Sustainability Appraisal / Strategic Environmental Assessment (SA / SEA) and guidance for making comments, were available on the Council website www.horshamdistrictldf.info , at the District's Parish Council Offices and at the following locations for the duration of the consultation:

Horsham District Council Offices	North, North Street, Horsham West Sussex, RH12 1RL	8.45am to 5.20pm Monday to Thursday and 8.45am to 4.20pm Fridays
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Also in the following libraries / help points:

Billingshurst Library	Mill Lane, Billingshurst	Monday to Friday 10am to 5pm, Saturday 10am to 2pm
Henfield Library	Off High Street, Henfield	Monday to Friday 10am to 5pm, Saturday 10am to 2pm
Horsham Library and Help Point	Lower Tanbridge Way, Horsham	Monday to Friday 9am to 9pm, Saturday 9am to 5pm
Pulborough Library	Brooks Way, Pulborough	Monday to Wednesday 1pm to 5pm, Thursday to Saturday 9am to 1pm
Southwater Library	Lintot Square, Southwater	Monday to Wednesday 1pm to 5pm, Thursday to Saturday 9am to 1pm
Steyning Library	Church Street, Steyning	Monday to Friday 10am to 5pm, Saturday 10am to 2pm
Storrington Library and Help Point	Ryecroft Lane, Storrington	Monday to Friday 9.30am to 5.30pm, Saturday 10am to 4pm

In addition to the above, the documents were made available at each of the public consultation events, outlined later in the statement. The availability of documents meets the requirements set out in the adopted SCI 2007.

2. Consultation and involvement methods

Letters

Approximately 3500 letters, outlining the consultation, were sent out to those Horsham District residents who are held on the Local Development Framework (LDF) database, as they have either commented previously on a LDF consultation or have requested to be added to the LDF database in order to be kept informed of future consultations. Similar letters and, where

appropriate, documents, were also sent to all statutory consultees who are set out in Appendix 3 of the Revised SCI, as well as all Council Members, internal departments and officers; as well as the District Libraries and Help Points. The above meets the requirements set out in the adopted SCI 2007.

Draft Interim Statement summary leaflet and questionnaire

A Draft Interim Statement summary leaflet and questionnaire was developed in partnership with community organisations through the Reference Groups for Billingshurst and Southwater. This was following a suggestion at the Reference Groups as an additional method of capturing the Districts resident's views on the proposals. The questionnaire was designed to provide an overview of public opinion, with encouragement to find out further information, visit one of our public consultation events / exhibitions being held and make more detailed comments online through the consultation website.

One leaflet was delivered to every household within the potentially affected Parishes of Billingshurst and Southwater. Leaflets to the urban areas of both Billingshurst and Southwater Parishes were delivered by hand over the weekend of the 22nd and 23rd January 2011. Leaflets delivered to the rural areas of both Billingshurst and Southwater Parishes, were delivered by post over the week before and the week after the above weekend.

Billingshurst: - There are approximately 3600 households within the Parish of Billingshurst, and approximately 3000 leaflets were hand delivered to the urban area of Billingshurst Parish (defined by Policy CP5 – Built Up Areas, of the Core Strategy 2007) and approximately 600 leaflets were posted to the rural areas.

Southwater: - There are approximately 3900 households within the Parish of Southwater, and approximately 3300 leaflets were hand delivered to the urban area of Southwater Parish (defined by Policy CP5 – Built Up Areas, of the Core Strategy 2007) and approximately 600 leaflets were posted to the rural areas.

In addition to the above, approximately 170 and 650 leaflets were sent out through Castlewood Primary School, Southwater and Billingshurst Primary School, Billingshurst, respectively. The Weald Community School and Sixth Form sent the leaflet through their electronic system to parents, staff and governors.

Both Billingshurst Parish Council and Southwater Parish Council were given a batch of leaflets to make readily available at their Parish Council Offices, with additional requests also provided for.

This leaflet and questionnaire, as well as its distribution, was a new form of consultation and was in addition to the consultation methods set out in the adopted SCI 2007.

Public consultation events / exhibitions

Horsham District Council ran six public consultation events / exhibitions during the eight week consultation period, with focus being on the potentially affected Parishes of Billingshurst and Southwater as set out below:

Billingshurst Village Hall	Wednesday 26 th January	15:30 – 20:00
Billingshurst Village Hall	Saturday 29 th January	9:00 – 12:30
Horsham District Council Offices	Wednesday 2 nd February	15:30 – 20:00
Southwater, Beeson House	Thursday 10 th February	15:30 – 20:00
Southwater, Beeson House	Saturday 19 th February	9:00 – 12:30
Horsham District Council Offices	Tuesday 22 nd February	15:30 – 20:00

Each event was led and represented by Horsham District Council's Strategic Planning Team; however the members of the Reference Groups were also invited to be present at these events. The two events held in Billingshurst had representatives from Billingshurst Parish Council. The two events held in Southwater had representatives from Southwater Parish Council, the local action group 'Keep Southwater Green' and Berkeley Homes. The two events held in Horsham had representatives from Southwater Parish Council and 'Keep Southwater Green'.

A further public event during the consultation period, arranged by Southwater Parish Council, was attended by the Cabinet Member for Strategic Planning and the Spatial Planning Manager, as well as the other members of the Reference Group. At this event presentations were given and questions answered from the public audience.

It was considered that targeted consultation of more 'seldom heard' groups would be most effective, in addition to the public consultation events / exhibitions for the Draft Interim Statement and Revised SCI. Groups were therefore attended for the Senior Persons Council, HYPER (Horsham Youth Council) and the Equalities Forum.

These forms of consultation were considered to be the most appropriate way to engage with the local community on the two documents and these public consultation events / exhibitions and meetings exceed the requirements set out in the adopted SCI 2007.

Advertising

An advertisement, outlining the consultation, was placed in the West Sussex County Times on the Thursday 20th January and news items and links to the

documents were placed on the Council's website and the dedicated LDF website for the duration of the consultation period. Press releases were also sent out to a variety of local media sources including other local papers and radio stations. Press briefings and questions were requested throughout the consultation.

Posters as well as large banners, outlining the consultation, were distributed to Billingshurst and Southwater Parish Council's to display as they wished around the settlement.

These meet the requirements set out in the adopted SCI 2007, with large banners being a new additional form of local advertising.

Guidance material

To encourage people to comment, particularly using the Council's online consultation website, various guidance documents were produced and made readily available. These included a Frequently Asked Questions paper which answered questions such as 'What is an Interim Statement?' A postcard was produced with the aim of promoting making comments through the consultation website, rather than using other methods. Finally, a step by step guide to registering on and then commenting through the consultation website was produced.

Commenting on the Draft Interim Statement or Draft Statement of Community Involvement

Although the Council encourages people to comment online through the consultation website, other methods of commenting are equally accepted. During the consultation, there were 5 ways of commenting, these were:

1. Online through the consultation website;
2. on a comments form related to the document;
3. via an email;
4. by letter; and or
5. by completing the questionnaire.

Results of the consultation

Representations submitted online

Draft Interim Statement

There were 277 representations submitted in total (excluding the 40 letters we received that have been uploaded, reported separately below) to the Council through the online consultation website, Objective Online; however, 7 of these comments were inadmissible. These representations were against the various chapters and appendices of the Draft Interim Statement.

Draft Interim Statement Sustainability Appraisal

There were 3 representations submitted to the Council through the online consultation website, Objective Online.

Draft Statement of Community Involvement 2011

There were 7 representation submitted to the Council through the online consultation website, Objective Online.

Summary Leaflet and Questionnaire

Billingshurst

The total number of questionnaire responses received is 303. Of this total, 281 were received from people living within Billingshurst Parish and 22 were received from people living outside Billingshurst Parish. This equates to a response rate of 3.4% of those within Billingshurst Parish.

Southwater

The total number of questionnaire responses received is 1,646. Of this total, 1,494 were received from people living within Southwater Parish and 152 were received from people living outside Southwater Parish. This equates to a response rate of 13.9 % of those within Southwater Parish.

Letters

In addition to the representations made through the Council's consultation website, Objective Online and the questionnaire responses we received, 286 letters were received. 42 of these letters have been uploaded onto the Councils online consultation website as permission has been granted to make the representations public. 15 of these letters have not been uploaded onto the Councils online consultation website as permission to make the representations public has not been given. The remaining 229 letters have also not been uploaded onto the Councils online consultation website as we have not received a response as to whether the representation can be made public or not.

Late Reps

17 representations were received after the closing date of the consultation, the 18th March 2011. 15 of these representations were responses to the questionnaire and 2 of these responses were letters.

Strategic Planning Advisory Group 14th June 2001
Agenda Item 3, Appendix 2a

Billingshurst Analysis of Draft Interim Statement

Horsham District Council consulted on the Draft Interim Statement *Managing Development in Horsham District* between 21 January 2011 and 18 March 2011. The Draft Interim Statement considered possible development at two locations; Southwater and Billingshurst. Whilst the overall document discusses the reasons and proposals in relation to both sites, the Draft Interim Statement includes a separate appendix specifically for Billingshurst and another for Southwater. This analysis focuses on the comments made directly in response to the Billingshurst section. There are also comments which have been linked to the whole document and refer to general issues and or both potential sites, where appropriate, these have also been incorporated into the following analysis.

A total of 74 comments were recorded against *Appendix 4: Billingshurst Development Options*, from 51 different respondents. Of the comments 62 were objections, 6 were supporting and 6 were observations.

Representations Received

There was an overall feeling that local opinion had been ignored; a view upheld by Billingshurst Parish Council. Most felt that Billingshurst residents had made it clear that they didn't want large scale development; 804 representations to the Core Strategy Review, a petition of 3,300 opposing development and a Parish Council meeting attended by 180 people giving a mandate to the parish council to object. The continual round of consultation is considered by many to be a form of 'bullying'; in that people no longer see the value in responding feeling their views have previously been ignored. Alongside this, it is considered that the Localism Bill and the Government's intention to abolish the Regional Spatial Strategy should be taken into account as part of any overall strategy. The emphasis of the Bill being on consultation with neighbourhoods and giving communities the right to decide what is best for them.

There is concern about building on greenfield sites, the loss of countryside and the impact on the landscape and ecology. There is reference to 'misleading' statements which suggest that the 500 option will have less environmental impact. Overall, the 500 dwelling option is considered too large. There is a general feeling that development should be spread around the District; and this applies to affordable housing too. The Parish Council make the point that the numbers of affordable housing need to be supported by the results from the Local Housing Needs Survey. Others commented that the Locally Generated Housing Needs Survey carried out as background work to the Core Strategy Review was in their view 'flawed', particularly since the decision not to go ahead with a second runway at Gatwick; and decisions shouldn't be taken in light of it.

A number expressed concern that a relief road would have an adverse impact on the village centre, taking people away rather than encouraging them in. Some pointed out that this was the effect of the previous by-pass. West Sussex County Council supports a relief road between the A272 and A29 as an essential element of any major housing development to the east of the village. In its view, this would have the effect of removing through traffic (particularly HGV's) from the centre of Billingshurst

thereby allowing the downgrading of the High Street to make it a much more pleasant environment for shoppers.

There are two continuing themes relating to the provision of a new school and doctors surgery. Firstly, it is considered without the development neither would be needed, therefore they cannot be considered a 'benefit'. Secondly, the developer consortium has only committed to provide the land. There is no guarantee that the facilities will get built. It is noted here that this second argument runs through the objections with much concern that the scheme will not provide sufficient necessary infrastructure, including water supply and waste water treatment, or benefits, such as community facilities. In relation to education, West Sussex County Council makes it clear that to fully fund a new secondary and primary in Southwater, build a new primary and expand The Weald in Billingshurst, would require a greater number of houses than either of the options outlined in the Interim Statement; though acknowledges that both Options 2 and 3 allow for more robust planning of school places.

Several objectors make the point that the proposals make no provision for employment and that occupiers of new dwellings which have to look outside of the village for work. This questions the logic of large scale development and any sustainability arguments.

There were 3 clear representations of support for Option 3; considering it well thought out and an opportunity to bring the heart back to the village. A third 'supporter' was happy with Option 3 but only providing the infrastructure, including the station car park, education and shopping provision, requirements were guaranteed.

Summary of Key Stakeholder Comments

West Sussex County Council

Transport

WSSCC's main concerns were with regards to transport policy as they would like HDC to consult LTP3 for guidance on ways to keep the Strategic Road Network (SRN) moving, thereby helping to deliver major improvements along the A24 Ashington to Southwater corridor. In light of this they would expect any development along this route to contribute to delivering this aim and should proposals create a negative impact upon journey times along the SRN, solutions must be provided as to how the impact would be mitigated.

With respect to the above, WSSCC's most favourable development option would be Option 3: Notably Planned Growth as this would allow for the clear planning and delivery of solutions. It is stated that unplanned growth would lead to a fragmented approach that is likely to result in a negative impact upon the policies of the LTP and mean that strategic solutions would be almost impossible to deliver.

Further points which were detailed in the comments included the fact that development proposals should address any potential rat-running issues and ensure that sustainable travel is encouraged - namely there were specific concerns from rural communities about the need to extend further the frequency and coverage of public transport routes including bus access to the Arun Valley Line. Development proposals should also seek to ensure that the need to travel is reduced.

WSSCC is of the view that the provision of a north-eastern relief road between the A272 and A29 must be an essential element of any major housing development to

the east of Billingshurst. This would have the effect of removing through traffic (particularly HGV's) from the centre of the village thereby allowing the downgrading of the High Street to make it a much more pleasant environment for shoppers. The new relief road should skirt the eastern boundary of the development rather than passing through it as the latter would create a barrier between different parts of the new community and lead to an increase in journey times due to delays generated by the need for a lower speed limit and a number of controlled crossing points. Having a new road pass through the development rather than around it together with a new roundabout on the A272 where it crosses, may still encourage traffic to go through Billingshurst rather than use the relief road. The new relief road should therefore ideally connect in to the existing A29 roundabout at the northern end of the village and into the A272 to the east of the village where there is an opportunity to realign the A272 to straighten out a sharp bend.

Existing bus services serving the village would need to be extended and enhanced to ensure they serve new development and provide the necessary link to Billingshurst railway station and local community facilities in the village such as shops, schools, the medical centre and library. Bus services between Billingshurst and larger towns and employment centres, such as Horsham, should also be enhanced where possible. It is also essential that new/improved safe and convenient cycle and pedestrian links are provided between the new development and local community facilities to reduce dependence on the private car. Indeed, the roads around the existing schools in the village are often congested at school dropping off/picking up times which creates potential dangers for schoolchildren and obstructions for other highway users.

It is noted that the Interim Statement refers to 12 carriage rail platform extensions at Billingshurst station, but this is actually an 8 carriage platform extension and has recently been completed. This means that northbound 8 carriage trains no longer block the level crossing, therefore road crossing delays should be reduced. However, there is a need to provide additional parking spaces at the station to cope with increasing demand as the existing car park is often filled to capacity.

Education

Option 1 – Unplanned Growth

Smaller sites coming forward in an ad hoc manner across the District creates difficulties for school place planning and can put pressure on local schools that cannot be easily expanded. Larger strategic development affords opportunities to develop a coherent pattern of both primary and secondary school sites as well as facilities for pre-school children and youth services at nil or minimal cost to the Authority. Strategic development also allows these sites to be identified in locations where pupil demand is forecast to be high and avoids the site restrictions of existing schools.

Option 2 – Limited planned growth

Both Options 2 and 3 allow for more robust planning of school places in line with previous submissions to the Horsham District Core Strategy. However it should be noted that to fully fund a new primary and secondary school in Southwater, build a new primary and expand The Weald in Billingshurst, would require a greater number of houses than either of the options outlined in the Interim Statement. WSCC would wish to secure sites at the earliest opportunity in order to accommodate the suggested increase in housing numbers and also with a longer timeframe in mind where further land may be brought forward along the lines of the earlier Core Strategy Issues and Options consultation.

Option 3 – Notably planned growth

In addition to the comments on Option 2, they would wish to seek provision for pre-school children and also youth services where developments are 500 units or more. There is more pressure to secure primary school sites for both developments for differing reasons

Libraries

WSCC considers the statements on libraries to be correct and reflect its current approach of seeing libraries as part of community facilities. The current libraries provision at Billingshurst and Southwater could cope with some increase in use.

Minerals Safeguarding

The proposed site to the east of Billingshurst identified in the draft Interim Statement falls within the brick clay MSA (weald clay type). Due to the extent of the weald clay, the County Council is likely to take a pragmatic approach, preferring to safeguard areas around existing clay pits. Therefore there is unlikely to be an objection on mineral safeguarding grounds to development in these locations.

Potential Waste Sites

The identification of potential development sites should consider the integration of waste management facilities to serve the development. Such waste uses could include the potential to use energy derived from biomass waste, thermal treatment and anaerobic digestion.

Existing Waste Sites

It is also important to ensure that existing sites are not lost to other forms of development unless there are overriding reasons for their redevelopment.

Wastewater Treatment

The requirement for new or extended waste water treatment works is closely linked to new development proposals. Joint working is required between the Districts and statutory sewerage undertakers in order to identify likely future requirements and in particular, if new sites will need to be identified through the MWDF. Southern Water has identified that additional WwTW capacity may be required to accommodate the additional growth in Horsham District.

Fire and Rescue

The Fire and Rescue Service is a statutory consultee and has a duty to profile and assess emergency response times for this reason road structure and supporting networks ensuring emergency service access to property or incident is a service priority. The provision of suitable water supplies via hydrants attached to a main suitable for fire fighting will be required to be provided and fully funded by the developer.

English Heritage

Unfortunately, resources are such that they are unable to comment in detail on non-statutory consultations.

They concur with the view that planned development provides better opportunities to manage and mitigate risks to the historic and built environment and that the development plan policy framework provides a means to achieving this.

They note the several statutory listed buildings in Billingshurst referred to in para. 4.8 and urge that the progress of proposals on these sites be informed by a broad

understanding of the heritage assets present, including, for example, locally important heritage features. In order to minimise the risk to the significance of heritage assets, the Council's conservation adviser should be consulted as work on the Interim Statement progresses.

Environment Agency

In general the Environment Agency are supportive of the document and of the proactive and managed approach to the delivery of sustainable development within Horsham.

DEFRA is currently devising a policy on the 'no deterioration' element of the Water Framework Directive (WFD). The aim of WFD is for all waterbodies to achieve Good status, in addition, deterioration of a water body is not allowed. Currently the EA do not know the outcome of the policy, however it is possible that under certain circumstances, headroom may be taken back from wastewater treatment works, where allowing growth would result in a deterioration in the waterbody class. The EA will update Horsham District Council once the 'no deterioration' policy is published.

Sport England

General comments were made about sports provision, the role of the planning system and Sport England. Their main consideration is that the Interim Statement makes adequate provision for new open space, sport and recreation facilities and seeks to protect existing playing field stock being lost to development.

Sport England will oppose proposals which would result in the unjustified or avoidable loss of sport unless an equivalent replacement in terms of quality, quantity and accessibility if the loss of a facility is unavoidable or unless it can be proved that the facility is genuinely redundant and there is no demand for a replacement based on thorough local assessment. Therefore, if a site including a sports facility is put forward for development in the future the applicant will need to provide an equivalent replacement or provide evidence that the facility is redundant and there is no demand for a replacement. This constraint should be included within the policy allocation for this site.

Natural England

Natural England has no comments to make on these documents.

Southern Water

Southern Water's view on the three proposed options relates to the company's investment planning process. Investment is planned through five yearly price reviews undertaken by Ofwat, the water industry's economic regulator. Planning documents, such as Horsham's Interim Statement, informs Southern Water's investment planning. Adopted documents provide the planning certainty they require to support investment proposals to Ofwat.

Investment required to wastewater infrastructure is highly dependent on the specific location of new development. This is because the location determines which wastewater treatment works will receive the wastewater, which to a large extent is drained by gravity. Knowledge of specific development sites is therefore imperative in order to assess the works that will receive the flow. Southern Water are unable to plan investment to meet demand from new development unless development plan documents identify where development will take place.

They therefore support paragraph 4.33 of the Interim Statement, which recognises that planned development provides a better opportunity than unplanned development to meet the demand arising from it in a timely manner.

On this basis, Southern Water would prefer either Option 2 or 3 over Option 1 on the basis that a planned approach would enable better forward planning by the planning authority, which in turn would inform Southern Water's investment proposals.

At Billingshurst WwTW the existing hydraulic capacity is approximately 500 homes. If development in the catchment (including extant planning permissions) exceeds this number, a new or amended environmental permit would be required from the EA to increase the volume that can be discharged. Southern Water are not aware of any environmental constraints in the area, and anticipate that the EA would permit such increases.

At both Southwater and Billingshurst, the existing capacity in the sewerage system (the network of underground pipes that convey wastewater to the works for treatment) is insufficient to meet the anticipated demand.

Billingshurst Parish Council

The Parish Council believes that Billingshurst's rapid growth in the last ten years has already brought the village up to its 'natural' boundaries in the landscape and beyond the capacity of its infrastructure.

The Parish Council gave the following reasons for objecting:

Housing – It is believed that Billingshurst should be allowed to absorb the growth it has taken in the last ten years and not be asked to absorb yet more.

Employment - The Parish Council would prefer to see employment rather than residential development coming forward enabling the village to become more self-contained.

Transport Links – It is believed that house building in Billingshurst can only swell the number of out-commuters adding to further pressure on the local road network.

Education Provision – The Parish Council note that there are severe limitations to the enlargement of the Weald School on its current site.

Acute Healthcare - The parish of Billingshurst sits on the extremity of the catchment area for Acute Healthcare available only in Worthing, Chichester and the East Surrey Hospitals. All of these hospitals are more than 20 miles away from the parish and until improvements are made bringing Acute Healthcare closer to the parish, it is considered unwise to place greater strain on the community responder volunteers.

Doctors Surgery – It is noted that the surgery is operating at near capacity now and the current site is constrained for expansion.

Dentists - The only dentist in the village is not accepting new NHS patients.

Flood Risk - There is a history of flooding, including business and community premises in the High Street, associated with the Par and Cedar Brooks. It is believed that development in the vicinity of these watercourses can only add to the risk of further flooding.

Water Supply – It was noted that the proposals would require reinforcement of the water infrastructure. The landscape and ecological impact of implementing this investment would also need to be assessed.

Sewerage - There is currently no surplus foul sewer capacity to accommodate development. The full implications of addressing this capacity shortfall have not been exposed and evaluated.

Landscape Character - A number of studies have confirmed that the landscape to the east of Billingshurst is of rural, undeveloped and historic character with high sensitivity to change.

Biodiversity - The overall carrying capacity of valuable wildlife habitats to the east of the village will diminish as a result of development and, in consequence, biodiversity across the area will decline significantly.

Cemetery Provision - St Mary's Churchyard in Billingshurst has been closed for burials since 18 March 1969. There is currently no provision for burials or cremation plots for existing residents. The nearest cemetery is the Hills Cemetery in Horsham.

West Sussex Fire and Rescue Service - The parish of Billingshurst is served by one part time retained Fire crew.

Sussex Police - The parish of Billingshurst is served by Sussex Police based at Pulborough Police Station. This is not a 24 hour manned Police Station, the nearest of which is Crawley or Brighton.

Core Strategy Review

The Parish Council feel their views were ignored because development at Billingshurst has continued to be promoted despite opposition. The Parish Council would therefore like to see justification for the reason for including land east of Billingshurst in the Interim Statement and its reasons for excluding the other Category one sites. It also feels that other strategic site options relate better to the employment opportunities at Horsham, Crawley, Gatwick and on the south coast, as they are better connected to the strategic road and rail network.

The Parish Council feel the Draft Sustainability Appraisal fails to explain why the Billingshurst site should now be promoted for development when its release had been rejected on previous occasions. The Parish Council believes that if a full Appraisal had been completed it would have shown that the release of land for development adjacent to Horsham and between Horsham and Crawley continues to offer the most sustainable pattern of growth for the District and that because Billingshurst is relatively remote from the concentration of public transport, utilities and community infrastructure in the Gatwick Triangle growth area, its expansion would give rise to a disproportionately high percentage of journeys by private transport in fundamental conflict with national and local policy imperatives.

Five Year Housing Land Supply

The Parish Council feel that the origins of the shortfall in the five year housing land supply do not lie within the Parish of Billingshurst. Therefore its residents should not be asked to sacrifice their quality of life in consequence.

Adopted Core Strategy

The Parish Council note that the 2007 Core Strategy stated *No provision before 2018 for any further large scale development at Billingshurst but recognition that this may need to be reviewed in the future, particularly with regard to the need to relocate*

businesses and re-develop some of the existing industrial areas as part of a comprehensive planning strategy.'

West of Horsham and West of Crawley

The Parish Council wish to receive more feedback on the delay surrounding the strategic locations at west of Horsham and west of Crawley and question why these two sites have been slow in coming forward meaning the District Council has failed to manage its five year housing land supply.

District Housing Needs and Economic Expansion Study

The Parish Council questioned whether link between the provision of new housing at Billingshurst and growth of the District's economy had been proved in Locally-Generated Housing Needs Study, April 2010.

New Homes Bonus and Community Infrastructure Levy

The Parish Council state it is important to separate out infrastructure requirements necessary to enable new houses to be occupied and those necessary to enable the successful integration of new and existing communities without an unreasonable strain on community facilities.

The Parish Council would like to see the benefits of the New Homes Bonus and Community Infrastructure Levy clearly detailed, providing detail on the ability of developers, utility companies or public agencies to fund the necessary investment programme.

Reference Groups

The Parish Council wishes to refute the false impression given by the following statements.

'Proposals for a fraction of the development previously put forward, around 500 homes at Billingshurst (previously 1,750) and 500 at Southwater (previously 2,750) are being considered by Councillors at Horsham District Council's Council meeting on 13 October. These proposals have been worked up with representatives of Billingshurst and Southwater communities and would provide local homes for local people as well as necessary infrastructure and a significant amount of community facilities.' (Press Release on the Interim Statement, 2010)

'The Draft Interim Statement sets out options for development in order to address this Council's short term housing requirements, including options for large scale residential development at Billingshurst together with infrastructure provision and the provision of community facilities. This document has been prepared with representatives of the local community.' (Page 4, para 3, DM report on planning application DC/10/0939, land south of Gilmans)

The Parish Council has not helped to shape any of the policies in this Interim Statement consultation.

Elections

The Parish Council state their unhappiness that due to a number of delays, the Interim Statement consultation was run prior to the pre-election period and that the District Council is unlikely to consider the results of this consultation and determine its policy until after the District Council elections in May 2011.

Local Housing Needs Survey

Parish Council contends it is premature to determine housing policy for Billingshurst without the results of the Local Housing Needs Survey which is still awaited.

Interim Statement Consultation Results

The Parish Council note their unwillingness to submit a response to the Interim Statement Consultation differing from its current stance of vehement objection without seeing the results of the HDC consultation.

The Parish Council would like to see the following information:

- A convincing argument addressing all the Parish Council's original objections to the expansion of Billingshurst;
- A demonstration of the ability of large-scale housing development in Billingshurst to stimulate sustainable economic growth in the District as a whole;
- Evidence of a commitment by the District Council to stimulate development in the Areas of Opportunity east of Horsham and Crawley;
- HDC Interim Statement questionnaire results;
- Local Housing Needs Survey results;
- Details of a credible (fully-funded) investment programme necessary to enable the development to be occupied and its impact on local transportation, utility and community infrastructure to be mitigated; and
- Details of the funding available for additional community infrastructure through the New Homes Bonus and Community Infrastructure Levy.

Billingshurst Chamber of Commerce

Billingshurst Chamber of Commerce gathered information from multiple sources including HDC, the relevant property developers, and the 'Save Billingshurst' movement. They also consulted with all members, each of whom were encouraged to visit the HDC exhibitions and to attend a presentation to the Chamber by the developers.

The BCC are keen to see Billingshurst prosper and acknowledge that a larger population can lead to a more robust business/retail sector. They note that a 'master plan' is needed for Billingshurst that would integrate the planning for additional housing, with the provision for improvements in and the maximisation of community, business and retail services, and additional employment.

The Chamber therefore supports Option 3, with the following constructive provisos:

- A commitment to the identified additional community and business benefits for Billingshurst must be enshrined in the scheme and guaranteed;
- A cogent plan for Jengers Mead and Billingshurst retail must be given high priority;
- Village centre parking, additional office space and an industrial park review;
- Specific plans for additional employment;

The BCC intends to be constructive and to vote for the Option that will provide Billingshurst with the greatest number of added opportunities and benefits that the village might not otherwise gain. It states that benefits to the business sector thus employment and the community, must be an integral part of any plan.

Members would prefer to see planned housing development in a defined area, PLUS the associated benefits and infrastructure that will enhance the prosperity of Billingshurst, as referred to in the HDC publications and presentation, rather than unplanned, disparate development with no guaranteed support services and/or infrastructure. The additional benefits must be guaranteed, and the BCC wishes to be involved in this process.

BCC supports Option 3 in the context of the factors below:

- Billingshurst is a service centre and has good road and rail links. Thus it is a logical place for expansion and has the basic necessities to flourish, given the resources and opportunity;
- People are living longer and are staying in their own home for longer. The consequence of which is that there is a reducing number of properties coming onto the market for local people;
- There is a shortage of houses at affordable prices without which residents are being forced to move away, which is damaging for the village; and
- Billingshurst must move forward or it will be left behind, socially and economically.

BCC supports Option 3 with the following wider provisos:

- They wish to be involved in the allocation of Section 106 and other monies mentioned and/or alluded to in the HDC presentation of the proposed outline schemes for Billingshurst;
- They wish to ensure that the maximum number of community benefits (schools, bypass, sewerage and drains, cemetery etc) employment and benefits for the business community noted elsewhere in this paper are guaranteed for Billingshurst by the developers and/or HDC;
- They wish to support a maximum effort made by HDC, in conjunction with all other interested parties, to address the redevelopment/remodelling of Jengers Mead as a key part of a Billingshurst 'master plan'. Jengers Mead is currently a blight in the centre of the village and little or no improvement can, or will, be made to the retail environment generally until this has been addressed.
- The additional housing proposed in Option 3 would bring negligible economic benefit to Billingshurst unless the 'High Street' area and Jengers Mead retail environment is addressed in lockstep with the proposed new housing development, village parking and employment;
- The provision of more office space is essential so that the new housing does not become dormitory space.
- An overall review of Billingshurst's industrial parks and their provisioning should be part of the programme.

Strategic Planning Advisory Group 14th June 2001
Agenda Item 3, Appendix 2b
Southwater Analysis of Draft Interim Statement

Horsham District Council consulted on the Draft Interim Statement *Managing Development in Horsham District* between 21 January 2011 and 18 March 2011. The Draft Interim Statement considered possible development at two locations; Southwater and Billingshurst. Whilst the overall document discusses the reasons and proposals in relation to both sites, the Draft Interim Statement includes a separate appendix specifically for Southwater and another for Billingshurst. This analysis focuses on the comments made directly in response to the Southwater section. There are also comments which have been linked to the whole document and refer to general issues and or both potential sites, therefore, where appropriate, these have also been incorporated into the analysis for Southwater.

A total of 29 comments were recorded against Appendix 5: *Southwater Development Options*. Of these: 25 objections, 2 support, 2 observations.

Representations Received

There are numerous comments relating to transport, specifically traffic congestion within Southwater if additional homes were to be built. Comments were focused on the school provision, both existing and proposed, and how this would significantly contribute to traffic congestion as they are, or proposed to be, located close together. Also linked to the proposed secondary school was the issue of busses entering Southwater and further adding to congestion. There were comments about the poor maintenance of roads when there was snow and how this problem would be exacerbated if further housing was built. Whilst it was recognised that Lintot Square offered facilities for the village, concern was raised over adequate car parking. In addition, public transport was also raised and better links between bus and rail connections along with inadequate parking at Christ Hospital station and Horsham station.

There was concern that the proposed development would represent a spur into the countryside and that there was no defined boundary to the west. This would be a loss of agricultural farmland and countryside. Sustainability was raised due to the amount of CO₂ likely to be produced by the new development and therefore a more suitable location should be proposed. It was felt that the existing nature within the area (including hedgerows, woodlands, footpaths, landscape and biodiversity) were undervalued and questions were asked about what was a 'Countryside Enhancement Area'. Flooding was also a concern, both existing and likely to get worse if developed occurred.

Comments were received relating to the lack of jobs and employment in the area (both within Southwater and the wider area). It was considered there was a lack of detail regarding the cost of the proposed benefits and if they would actually be delivered. A wider comment related to the whole District and suggested a hospital facility should be considered as a priority for the area as the existing hospital was too far and further development would make this situation worse for response times. Lack of policing and an increase in anti-social behaviour was also a concern.

There were comments stating that Southwater already had enough development and that requirements should be spread throughout the District. This might also offer the

opportunity to secure a higher percentage of affordable housing. It was considered that the Southwater proposal was premature and that the South East Plan was not a material consideration; therefore the proposals should be withdrawn until the Localism Bill. Proposals should go through the normal planning process, rather than the Interim Statement. In addition, the need for the development was questioned - why are people moving into the District counted as our need? It was felt that there was a lack of detail on the proposals and that they had been rejected previously and should be again.

Other comments related to the lack of a sustainable water supply and upgrades necessary for the waste water treatment works. Also mentioned was a lack of consideration for faith facilities considered under wider community infrastructure. Comments were also received relating to the protection of Listed Buildings and that archaeological surveys should be undertaken on the site.

Key Stakeholder Comments

West Sussex County Council

Transport

Local Transport Plan 3 (LTP) has just been approved and adopted as County Council policy. The key drivers are to improve the economy of the County, whilst also improving the quality of life. In the Draft Interim Statement, WSCC would expect the local planning authority to look at the LTP for guidance. The LTP is committed to keeping the Strategic Road Network (SRN) moving. It clearly states that to do this it will help deliver major improvements along the A24 Ashington to Southwater corridor, and would expect any development along this route to contribute in delivering this aim; with spare capacity. Any proposals which would create negative impact upon journey times along the SRN must provide solutions as to how it plans to mitigate its impact. Development proposals should address any potential rat-running issues, ensure that sustainable travel is encouraged and that the need to travel is reduced.

Option 1 - Unplanned Growth

This option would lead to a fragmented approach that is likely to result in a negative impact upon the policies of the LTP. Any fragmented development may be able to provide small scale improvements at specific locations, but the uncertainty of which sites may come forward means that strategic solutions would be almost impossible to deliver, resulting in more congestion being experienced on the SRN (specifically the A24 & A29), more instances of community severance, and a fall in the number of trips undertaken via sustainable means.

Option 2 - Limited Planned Growth

This would be a more preferable option to WSCC in terms of LTP delivery.

Option 3 - Notably Planned Growth

This would be the most favourable option to WSCC in terms of LTP delivery as it would allow for clear planning and delivery of solutions.

The capacity of the A24 Hop Oast roundabout to the north of the village is a constraint on the level of development that can be accommodated at Southwater. Although there may be a relatively low-cost design solution for this junction (in the form of a northbound slip lane from Southwater onto the A24) to mitigate the increase in traffic generated by the level of development suggested in the Interim Statement, if further development was to come forward that exceeded a certain level then this is

likely to require the grade-separation of the junction and therefore substantial investment.

It is essential that the development offers an appropriate package of sustainable transport improvements providing good access to local community facilities in the village and to Horsham town itself with its wider range of shopping and employment opportunities. As there are already issues of parking problems at Christ's Hospital station, public transport links to Horsham station should be improved together with the provision of a grade-separated cycle/pedestrian bridge across the A24 south of Hop Oast roundabout. WSCC considers that a cycle/pedestrian bridge should be provided at an early stage of the development as the lack of a safe crossing over the A24 discourages people from cycling and walking to and from Horsham. The Southwater Cycling Strategy also sets out a number of other key improvements needed to encourage more people to cycle in the village.

Address the issue of speeding traffic by the introduction of a speed reduction scheme in Worthing Road between (and including) Church Lane to the south and Cedar Drive to the north. This is likely to result in a more design led approach in terms of materials and features and the removal of the existing two chicanes. The car parking arrangements for the two schools also need to be improved as the areas set aside for this purpose in front of the schools are congested at school picking up and dropping off times.

The proposed enhancement of the Downs Link between the village centre and the development is welcome, but there is a security problem with part of the route immediately to the west of Worthing Road as this is not overlooked. An alternative safe and convenient route is therefore needed as many people may be uncomfortable about using the Downs Link at night.

Education

Option 1 – Unplanned Growth

Smaller sites coming forward in an ad hoc manner across the District creates difficulties for school place planning and can put pressure on local schools that cannot be easily expanded. Larger strategic development affords opportunities to develop a coherent pattern of both primary and secondary school sites as well as facilities for pre-school children and youth services at nil or minimal cost to the Authority. Strategic development also allows these sites to be identified in locations where pupil demand is forecast to be high and avoids the site restrictions of existing schools.

Option 2 – Limited planned growth

Both Options 2 and 3 allow for more robust planning of school places in line with previous submissions to the Horsham District Core Strategy. However it should be noted that to fully fund a new secondary and primary in Southwater, build a new primary and expand The Weald in Billingshurst, would require a greater number of houses than either of the options outlined in the Interim Statement. We however wish to secure sites at the earliest opportunity in order to accommodate the suggested increase in housing numbers and also with a longer timeframe in mind where further land may be brought forward along the lines of the earlier Core Strategy Issues and Options consultation.

Option 3 – Notably planned growth

In addition to the comments on Option 2, we would wish to seek provision for pre-school children and also youth services where developments are 500 units or more.

There is more pressure to secure primary school sites for both developments for differing reasons.

In Southwater there are currently 3 schools covering the primary phase, Castlewood Primary and Southwater Infant and Southwater Junior. The latter two schools are seeking to become academies outside of Local Authority control and directly funded by central government. Once they take on this status it may be less easy for the Authority to expand these schools and negotiations will have to take place with the schools and the Department for Education. Securing a new primary school site would be helpful to ensure there are sufficient places in the area.

Southwater development options: Generally there is no mention of facilities for pre-school children, whether nurseries or play groups schemes which require dedicated space, and there is no mention of youth facilities.

Libraries

WSCC considers the statements on libraries to be correct and reflect its current approach of seeing libraries as part of community facilities. The current libraries provision at Billingshurst and Southwater could cope with some increase in use.

Minerals Safeguarding

The proposed sites to the east of Billingshurst and to the west of Southwater that are identified in the draft Interim Statement fall within the brick clay Mineral Safeguarding Areas (MSA) (weald clay type). Due to the extent of the weald clay, the County Council is likely to take a pragmatic approach, preferring to safeguard areas around existing clay pits. Therefore there is unlikely to be an objection on mineral safeguarding grounds to development in these locations.

Potential Waste Sites

The identification of potential development sites should consider the integration of waste management facilities to serve the development. Such waste uses could include the potential to use energy derived from biomass waste, thermal treatment and anaerobic digestion.

Existing Waste Sites

It is also important to ensure that existing sites are not lost to other forms of development unless there are overriding reasons for their redevelopment.

Waste Water Treatment

The requirement for new or extended waste water treatment works is closely linked to new development proposals. Joint working is required between the Districts and statutory sewerage undertakers in order to identify likely future requirements and in particular, if new sites will need to be identified through the MWDF. Southern Water has identified that additional WwTW capacity may be required to accommodate the additional growth in Horsham District.

Fire and Rescue

The Fire and Rescue Service is a statutory consultee and has a duty to profile and assess emergency response times for this reason road structure and supporting networks ensuring emergency service access to property or incident is a service priority. The provision of suitable water supplies via hydrants attached to a main suitable for fire fighting will be required to be provided and fully funded by the developer.

English Heritage

Unfortunately, resources are such that they are unable to comment in detail on non-statutory consultations.

They concur with the view that planned development provides better opportunities to manage and mitigate risks to the historic and built environment and that the development plan policy framework provides a means to achieving this.

They note that the Southwater site is limited by constraints including listed buildings. We urge that the progress of proposals on these sites be informed by a broad understanding of heritage assets. In order to minimise the risk to the significance of heritage assets, the Council's conservation adviser should be consulted as work on the Interim Statement progresses.

Environment Agency

In general the Environment Agency are supportive of the document and of the proactive and managed approach to the delivery of sustainable development within Horsham.

DEFRA is currently devising a policy on the 'no deterioration' element of the Water Framework Directive (WFD). The aim of WFD is for all waterbodies to achieve Good status, in addition, deterioration of a water body is not allowed. Currently we do not know the outcome of the policy, however it is possible that under certain circumstances, headroom may be taken back from wastewater treatment works, where allowing growth would result in a deterioration in the waterbody class. We will update Horsham District Council once the 'no deterioration' policy is published.

Also comments made concerning the Sustainable Drainage System and surface run-off, with minor alterations to the document text recommended.

Sport England

General comments were made about sports provision, the role of the planning system and Sport England. Their main consideration is that the Interim Statement makes adequate provision for new open space, sport and recreation facilities and seeks to protect existing playing field stock being lost to development.

Sport England will oppose proposals which would result in the unjustified or avoidable loss of sport unless an equivalent replacement in terms of quality, quantity and accessibility if the loss of a facility is unavoidable or unless it can be proved that the facility is genuinely redundant and there is no demand for a replacement based on thorough local assessment. Therefore, if a site including a sports facility is put forward for development in the future the applicant will need to provide an equivalent replacement or provide evidence that the facility is redundant and there is no demand for a replacement. This constraint should be included within the policy allocation for this site.

Natural England

Natural England had no comments to make on the documents.

Southern Water

Southern Water's view on the three proposed options relates to the company's investment planning process. Investment is planned through five yearly price reviews undertaken by Ofwat, the water industry's economic regulator. Planning documents, such as Horsham's Interim Statement, informs Southern Water's investment planning. Adopted documents provide the planning certainty we require to support investment proposals to Ofwat.

Investment required to wastewater infrastructure is highly dependent on the specific location of new development. This is because the location determines which wastewater treatment works will receive the wastewater, which to a large extent is drained by gravity. Knowledge of specific development sites is therefore imperative in order to assess the works that will receive the flow. Southern Water are unable to plan investment to meet demand from new development unless development plan documents identify where development will take place.

They therefore support paragraph 4.33 of the Interim Statement, which recognises that planned development provides a better opportunity than unplanned development to meet the demand arising from it in a timely manner.

On this basis, Southern Water would prefer either option 2 or 3 over option 1 on the basis that a planned approach would enable better forward planning by the planning authority, which in turn would inform Southern Water's investment proposals.

Development in Southwater drains to Horsham Wastewater Treatment Works (WwTW), where environmental constraints have been identified by the Environment Agency (EA). This could limit the level of new development that can be connected to the works. The precise level that can be accommodated will depend on the standards Southern Water will be required to meet, which are currently uncertain. At both Southwater and Billingshurst, the existing capacity in the sewerage system (the network of underground pipes that convey wastewater to the works for treatment) is insufficient to meet the anticipated demand.

Southwater Sports Club

Southwater Sports Clubs feel that if housing development is going to come to Southwater we would prefer to support Horsham DC's option 3 (relating to 500 houses or so) because such a development would provide the necessary funds for the enlargement / relocation proposals for the Sports Clubs to go forward, while there would be no funds available for this purpose if either option 1 or 2 took place.

The members appreciated the advantages for the future of the Southwater Sports Clubs which are broadly:

- a) The relocation proposals would involve the Clubs obtaining a land area of 13 acres compared to the total of about 8 acres that it occupies at present.
- b) The playing areas for both cricket and football would be significantly increased / enhanced
- c) The new Pavilion would be more modern and suitable than our existing Pavilion; it would be designed to ensure that our improved facilities in the Pavilion include a ladies changing room (which we don't have at the moment) and that the new Pavilion will be designed to Sport England standards.

The Fletcher Trustees have agreed (if the option 3 development proposals go forward) and if the relocation proposals would qualify for 'open space requirements'

to grant 99 year leases which would secure the future of the Sports Clubs at Southwater for a long time to come. This means that the Sports Clubs will be able to continue to play (what we believe to be) an important role for the people of Southwater and, in particular, the new facilities will enable us to increase our future membership which we (obviously) hope to do when more people come to live in Southwater as a result of the development proposals.

Southwater Community Partnership - Southwater Action Team (SWAT)

As a Community Partnership the stated concern is to deliver our mission which is to work together and with others on issues and projects of interest and concern to Southwater Parish in order to ensure that any change best preserves the special identity of Southwater village and the local environment and fosters a socially inclusive and caring community. We are not against change. Already we see 200 houses planned for Southwater Parish in various locations and expect other development to come in the Christ's Hospital area of the parish. Until we see the detailed plans that Berkeley Homes will be show casing on 1st and 2nd April it is difficult to say much more, except to ask our partners in the Horsham District Council to afford us the opportunity to do so.

Strategic Planning Advisory Group 14th June 2001
Agenda Item 3, Appendix 3

Sustainability Appraisal Analysis of Draft Interim Statement

Only three comments were received that directly related to the Sustainability Appraisal of the Draft Interim Statement. In addition to these comments, a few additional representations were made on the sections of the Interim Statement that related to the findings of the Sustainability Appraisal. A total of 7 comments have been analysed and, if an Interim Statement is taken forward, will feed back into the production of the final Sustainability Appraisal.

Some of the comments made on the Sustainability Appraisal were very detailed in nature, for example highlighting additional background documents that should be taken into account or the need to ensure greater levels of consideration of certain aspects of the community in the report. However, three of the comments were more substantive in nature and questioned the results of the Sustainability Appraisal. In particular, it was queried whether unplanned growth would be less sustainable than planned growth. For example, it was stated that smaller scale development in villages and towns can help to keep village schools open. It was also pointed out that all developments would still generate developer contributions towards affordable housing / local services and facilities.

Whilst it is accepted that development in smaller settlements can be beneficial in retaining local services and facilities, and that all developments would generate some financial contributions towards local services and facilities, it is still considered that planned development is the more sustainable approach. One reason that unplanned growth is considered the least sustainable option is the fact that it will result in significant increases in car journeys. Recent studies show that people generally use services that are closest to them, and development in settlements with fewer services and facilities will result in increased journeys to other settlements in order to go shopping, visit the doctor, library or access leisure services. Therefore, unplanned development in smaller more rural settlements which have poor public transport will increase the number and distance of car journeys when compared with planned developments which are located close to a range of existing or new facilities which are within walking or cycling distance.

A further reason that it is considered that unplanned development is the least sustainable option is that in the event that development occurs, the numbers and location of development cannot be easily controlled by the Council. It could result in several developments coming forward in one village, whereas planned development could result in a smaller number of developments in a village coming forward and bringing more community facilities as comprehensive rather than piecemeal development. Development may also occur in a location where the local environment presents more constraints such as greater levels of flood risk or drainage issues. These problems can then limit the amount of money available for other community benefits. Development may also be at such a scale whereby pressure on existing services are increased, but is not large enough for the provision of new or increased level of services to be viable.

Appendix 4a **Billingshurst questionnaire analysis**

The Council delivered one questionnaire to each household within Billingshurst Parish, the number of which was approximately 3600. The leaflet, however, was also made available on the Council website, through the local schools, through the Parish Council and was also free to be photocopied by residents if more than one person per household wished to comment. Therefore, the questionnaires were made freely available and all had the opportunity to comment.

Although the Council endeavoured to make the questionnaire simple to complete, to encourage as many people as possible to complete it and have their say, many questionnaires received were only partially completed or had been completed in a way we had not anticipated. Therefore, the results may not always match the overall total.

The Council recognised the need to distinguish responses to the questionnaire from those within and outside the Parish. Therefore, a filter has been enabled which allows for filtering the responses by the postcodes RH14 9, which is specific to Billingshurst Parish, and those postcodes which are not specific to Billingshurst Parish. As this was also recognised by the Parish Council, this report focuses on the responses made by people who live at a household with this postcodes specific to Billingshurst Parish. Those responses to the questionnaire received from those outside Billingshurst Parish, have been taken into account, but reported separately.

The total number of Billingshurst questionnaire responses received was 303. Of this total, 281 were from people living within the Parish (postcodes RH14 9) and this is the figure that has been used for the analysis of the three questions. The number of questionnaires received from people living outside Billingshurst Parish (without an RH14 9) was 22.

Area of response	Number of responses
Within the Parish	281
Outside the Parish	22
Total	303

This consultation was open to everyone to express their views, as there was no age limit enforced through this consultation method. Of the 8,114 residents in Billingshurst Parish (West Sussex County Council population projections 2011), there was a response rate of 3.4%.

Of the 281 responses we received from people within the Parish of Billingshurst, the age breakdown of responses is as follows:

Age range	Number of responses
Under 16's	15

16-21	5
22-44	51
45-65	127
66+	83
Total	281

The largest proportion of responses we received came from those aged between 45 and 65, totalling 127.

Question 1: What concerns you about further development at Bilingshurst?

The top three concerns to this question were loss of countryside, lack of parking in the village centre and traffic congestion. For all of the top three concerns, the majority of the responses were from people aged between 45 and 65.

The next top three concerns to this question were poor drainage facilities, poor shopping facilities and capacity of the Weald Secondary School. Again, for all three of these concerns, the majority of the responses were from people aged between 45 and 65.

The bottom three concerns to this question were lack of market housing (for sale on the open market), lack of sports pitches and lack of burial places. Again, for all three of the bottom concerns, the majority of responses were from people aged between 45 and 65.

The table below shows the full results of the response to this question.

Concerns in order of importance	Total number of responses
Loss of countryside	200
Lack of parking in the village centre	170
Traffic congestion	161
Poor drainage facilities	150
Poor shopping facilities	148
Capacity of the Weald Secondary School	129
Lack of parking at the railway station	115
Capacity of the primary school	106
Poor access to the countryside	106
Waiting for doctors' appointments	104
Lack of employment provision	100
Lack of safe places to play close to where you live	76
Lack of affordable housing (rented / shared ownership housing)	67
Lack of pre-school places	61
Lack of burial places	54

Lack of sports pitches	36
Lack of market housing (for sale on the open market)	31

Question 2: Please rank the facilities below in order of importance.

Through looking at the data produced for question 2, it can be identified that the overall priorities for the residents of Billingshurst Parish are funding for a study to look at parking and shopping at Jengers Mead, community facilities, a new station car park and an eastern relief road.

However, if you look further into the data produced, it is evident that priorities differ for the different age groups. For those aged under 16 the priorities are community facilities, open space for sport and recreation and improvements to public footpaths. For those aged between 16 and 21 the priority is a re-built and improved doctors' surgery. For those aged between 22 and 44 the priorities are an eastern relief road, community facilities and open space for sport and recreation. For those aged between 45 and 65 and also aged 66 and above the priorities are funding for a study to look at parking and shopping at Jengers Mead, an eastern relief road and community facilities.

Question 3: Having considered the level of community benefits, alongside your concerns of further development, which option do you consider most appropriate for the future of Billingshurst?

The total number of respondents to this questionnaire living within the Parish was 281. Of these 281, 4 did not respond to this question, 180 respondents feel that Option 1 (unplanned growth, reacting to developers' planning applications) is most appropriate for the future of Billingshurst, 24 respondents feel that Option 2 (approx 250 homes plus planning applications that will come forward) is most appropriate for the future of Billingshurst and 73 respondents feel that Option 3 (approx 500 homes) is most appropriate for the future of Billingshurst. There is therefore a large overall majority in favour of Option 1 – unplanned growth and reacting to developers planning applications.

Option	Totals
Option 1: Unplanned Growth	180
Option 2: approx. 250 homes	24
Option 3: approx. 500 homes	73

Conclusion

In conclusion to the overall questionnaire what concerns residents most about further development at Billingshurst is loss of countryside, lack of parking in the village centre and traffic congestion. If development were to go ahead, the top priorities for the residents of Billingshurst are funding for a study to look at parking and shopping at Jengers Mead, community facilities, a new station car park and an eastern relief road. Notwithstanding the above, there

is a large overall majority in favour of Option 1 – unplanned growth and reacting to developers planning applications.

Notwithstanding the above, there is a large overall majority in favour of Option 1 – unplanned growth and reacting to developers planning applications.

Question 1 responses within Parish

Analysis.: What concerns you about further development at Billingshu...

Break.....: Age:

Filter.....: Postcode="RH14 9"

Cells.....: Absolute, Respondents

	Base	Missing	Age:				
		No reply	Under 16	16-21	22-44	45-65	66+
Base	281	-	15	5	51	127	83
Missing							
No reply	24	-	2	-	4	9	9
What concerns you about further development at Billingshu...							
Traffic congestion	161	-	9	5	31	79	37
Lack of burial places	54	-	1	1	5	28	19
Lack of pre-school places	61	-	3	1	10	31	16
Lack of sports pitches	36	-	7	2	6	16	5
Lack of safe places to play close to where you live	76	-	7	2	13	39	15
Waiting for doctors' appointments	104	-	6	1	22	49	26
Poor access to the countryside	106	-	10	4	21	48	23
Loss of countryside	200	-	13	5	39	94	49
Poor shopping facilities	148	-	4	1	22	69	52
Lack of parking in the village centre	170	-	6	1	25	79	59
Capacity of the primary school	106	-	6	2	24	45	29
Capacity of the Weald Secondary School	129	-	7	2	27	57	36
Lack of parking at the railway station	115	-	5	1	12	56	41
Poor drainage facilities	150	-	7	3	21	76	43
Lack of employment provision	100	-	1	1	11	54	33
Lack of affordable housing (rented / shared ownership housing)	67	-	-	1	7	31	28
Lack of market housing (for sale on the open market)	31	-	-	1	1	21	8

Question 2 response - Under 16 (Parish)

Analysis...: Q2a to Q2k
 Filter.....: Postcode="RH14 9" AND Age=1
 Cells.....: Absolute, Respondents

	Base	Missing											
		No reply	1	2	3	4	5	6	7	8	9	10	11
Base	165	125	8	5	3	3	3	3	3	3	3	3	3
Funding for a study to look at parking and shopping at Jengers Mead	15	11	1	-	-	-	1	1	-	1	-	-	-
Eastern relief road	15	12	-	1	-	1	-	1	-	-	-	-	-
Community facilities	15	10	2	-	3	-	-	-	-	-	-	-	-
Open space for sport and recreation	15	9	2	4	-	-	-	-	-	-	-	-	-
Re-built and improved doctors' surgery	15	12	-	-	-	-	1	-	-	1	1	-	-
A new primary school	15	12	-	-	-	-	-	1	-	-	1	1	-
Improvements to public footpaths	15	12	2	-	-	1	-	-	-	-	-	-	-
New station car park	15	11	1	-	-	-	1	-	-	-	1	-	1
Affordable housing (rented / shared ownership housing)	15	12	-	-	-	-	-	-	-	1	-	1	1
Market housing (for sale on the open market)	15	12	-	-	-	-	-	-	1	-	-	1	1
Cemetery	15	12	-	-	-	1	-	-	2	-	-	-	-

Question 2 response - 16-21 (Parish)

Analysis...: Q2a to Q2k
 Filter.....: Postcode="RH14 9" AND Age=2
 Cells.....: Absolute, Respondents

	Base	Missing											
		No reply	1	2	3	4	5	6	7	8	9	10	11
Base	55	22	1	1	1	1	1	1	1	1	1	1	23
Funding for a study to look at parking and shopping at Jengers Mead	5	2	-	-	-	-	-	-	-	-	1	-	2
Eastern relief road	5	2	-	-	-	-	-	1	-	-	-	-	2
Community facilities	5	2	-	-	-	-	-	-	1	-	-	-	2
Open space for sport and recreation	5	2	-	-	-	-	1	-	-	-	-	-	2
Re-built and improved doctors' surgery	5	2	1	-	-	-	-	-	-	-	-	-	2
A new primary school	5	2	-	1	-	-	-	-	-	-	-	-	2
Improvements to public footpaths	5	2	-	-	-	1	-	-	-	-	-	-	2
New station car park	5	2	-	-	1	-	-	-	-	-	-	-	2
Affordable housing (rented / shared ownership housing)	5	2	-	-	-	-	-	-	-	-	-	-	3
Market housing (for sale on the open market)	5	2	-	-	-	-	-	-	-	-	1	-	2
Cemetery	5	2	-	-	-	-	-	-	-	-	-	1	2

Question 2 response - 22-44 (Parish)

Analysis...: Q2a to Q2k
 Filter.....: Postcode="RH14 9" AND Age=3
 Cells.....: Absolute, Respondents

	Base	Missing											
		No reply	1	2	3	4	5	6	7	8	9	10	11
Base	561	144	39	39	35	34	35	32	34	32	34	30	73
Funding for a study to look at parking and shopping at Jengers Mead	51	13	5	6	2	6	2	4	3	1	1	2	6
Eastern relief road	51	13	7	1	4	2	3	2	3	7	4	1	4
Community facilities	51	12	7	9	6	6	1	1	3	1	-	-	5
Open space for sport and recreation	51	12	7	6	4	3	9	2	2	2	1	-	3
Re-built and improved doctors' surgery	51	13	3	3	4	3	5	5	3	3	2	2	5
A new primary school	51	13	3	7	2	3	5	2	4	4	1	1	6
Improvements to public footpaths	51	14	2	2	4	5	5	4	2	3	2	3	5
New station car park	51	13	-	3	3	3	2	1	6	5	7	1	7
Affordable housing (rented / shared ownership housing)	51	14	3	-	2	1	-	3	2	4	2	6	14
Market housing (for sale on the open market)	51	13	2	1	1	2	2	3	5	1	6	9	6
Cemetery	51	14	-	1	3	-	1	5	1	1	8	5	12

Question 2 response - 45-65 (Parish)

Analysis...: Q2a to Q2k
 Filter.....: Postcode="RH14 9" AND Age=4
 Cells.....: Absolute, Respondents

	Base	Missing											
		No reply	1	2	3	4	5	6	7	8	9	10	11
Base	1397	497	93	81	81	74	74	72	71	72	78	74	130
Funding for a study to look at parking and shopping at Jengers Mead	127	44	24	13	7	5	9	4	6	2	2	5	6
Eastern relief road	127	46	20	6	6	2	2	7	6	4	8	3	17
Community facilities	127	41	11	16	16	10	5	9	2	7	4	3	3
Open space for sport and recreation	127	43	7	13	9	7	6	9	9	6	7	4	7
Re-built and improved doctors' surgery	127	45	4	6	5	7	9	9	10	10	8	5	9
A new primary school	127	47	6	5	7	8	7	8	11	8	4	5	11
Improvements to public footpaths	127	45	8	6	8	11	6	3	10	9	8	5	8
New station car park	127	45	4	8	9	11	8	7	6	11	6	7	5
Affordable housing (rented / shared ownership housing)	127	46	5	5	7	5	6	7	4	5	8	12	17
Market housing (for sale on the open market)	127	48	2	1	4	3	9	4	3	3	10	17	23
Cemetery	127	47	2	2	3	5	7	5	4	7	13	8	24

Question 2 response - 66+ (Parish)

Analysis...: Q2a to Q2k
 Filter.....: Postcode="RH14 9" AND Age=5
 Cells.....: Absolute, Respondents

	Base	Missing											
		No reply	1	2	3	4	5	6	7	8	9	10	11
Base	913	286	72	55	57	60	53	54	55	52	56	53	60
Funding for a study to look at parking and shopping at Jengers Mead	83	22	18	14	6	7	6	1	-	-	1	4	4
Eastern relief road	83	24	24	5	5	2	7	4	3	2	1	2	4
Community facilities	83	27	7	6	5	10	7	7	4	5	3	-	2
Open space for sport and recreation	83	30	-	-	4	6	7	4	8	5	7	6	6
Re-built and improved doctors' surgery	83	28	5	6	4	3	7	3	5	10	5	2	5
A new primary school	83	26	3	7	4	10	3	8	7	4	6	3	2
Improvements to public footpaths	83	26	2	1	6	6	5	5	4	9	9	6	4
New station car park	83	23	4	7	10	12	2	7	5	6	2	2	3
Affordable housing (rented / shared ownership housing)	83	27	3	6	6	1	3	8	9	2	8	5	5
Market housing (for sale on the open market)	83	27	2	1	2	1	1	3	8	4	8	14	12
Cemetery	83	26	4	2	5	2	5	4	2	5	6	9	13

Question 3 response by Age (Parish)

Analysis...: Having considered the level of community benefits, alongs...

Break.....: Age:

Filter.....: Postcode="RH14 9"

Cells.....: Absolute, Respondents

	Base	Missing	Age:				
		No reply	Under 16	16-21	22-44	45-65	66+
Base	281	-	15	5	51	127	83
Missing							
No reply	4	-	-	-	1	3	-
Having considered the level of community benefits, alongs...							
Option 1 - unplanned growth, reacting to developers' planning applications	180	-	15	5	37	84	39
Option 2 - approx 250 homes plus planning applications that will come forward	24	-	-	-	2	10	12
Option 3 - approx. 500 homes	73	-	-	-	11	30	32

Appendix 4b **Southwater questionnaire analysis**

The Council delivered one questionnaire to each household within Southwater Parish, the number of which was approximately 3900. The leaflet, however, was also made available on the Council website, through the local schools, through the Parish Council and was also free to be photocopied by residents if more than one person per household wished to comment. Therefore, the questionnaires were made freely available and all had the opportunity to comment.

Although the Council endeavoured to make the questionnaire simple to complete, to encourage as many people as possible to complete it and have their say, many questionnaires received were only partially completed. Therefore, the results may not always match the overall total.

The Council recognised the need to distinguish responses to the questionnaire from those within and outside the Parish. Therefore, a filter has been enabled which allows for filtering by the postcodes RH13 0 and RH13 9, which are specific to Southwater Parish, and those postcodes which are not specific to Southwater Parish. As this was also recognised by the Parish Council, this report focuses on the responses made by people who live at a household with one of the postcodes specific to Southwater Parish. Those responses to the questionnaire received from those outside Southwater Parish, have been taken into account, but reported separately.

The total number of Southwater questionnaire responses received was 1,646. Of this total, 1,494 were from people living within the Parish (postcodes RH13 9 or RH13 0) and this is the figure that has been used for the analysis of the three questions. The number of questionnaires received from people living outside Southwater Parish (without an RH13 9 or an RH13 0 postcode) was 152.

Area of response	Number of responses
Within the Parish	1,494
Outside the Parish	152
Total	1,646

This consultation was open to everyone to express their views, as there was no age limit enforced through this consultation method, Of the 10,698 residents in Southwater Parish (West Sussex County Council population projections 2011), there was a response rate of 13.9%.

Of the 1,494 responses we received from people within the Parish of Southwater, the age breakdown of responses is as follows:

Age range	Number of responses
Under 16's	144
16-21	68

22-44	454
45-65	566
66+	262
Total	1,494

The largest proportion of responses we received came from those aged between 22 and 65, totalling 1,020.

Question 1: What concerns you about further development at Southwater?

The top three concerns to this question were loss of countryside at 1,194, traffic congestion at 1,140 and impact on character settlement at 968. For all of the top three concerns, the majority of the responses were from people aged between 45 and 65.

The next top three concerns to this question were poor drainage facilities at 724, lack of open space for sports and recreation at 707 and waiting for doctor / dentist appointments at 675. Again, for all three of these concerns, the majority of the responses were from people aged between 45 and 65.

The bottom three concerns to this question were lack of market housing (for sale on the open market) at 137, travelling a long distance to secondary school at 163 and lack of allotment provision at 207. Again, for all three of the bottom concerns, the majority of responses were from people aged between 45 and 65.

The table below shows the full results of the response to this question.

Concerns in order of importance	Total number of responses
Loss of countryside	1194
Traffic congestion	1140
Impact on settlement character	968
Poor drainage facilities	724
Lack of open space for sports and recreation	707
Waiting for doctor / dentist appointments	675
Poor access to the countryside	671
Inadequate drop off and pick up points next to the schools	473
Poor cycle / pedestrian access across the A24	445
Lack of school places	427
Lack of safe places to play close to where you live	387
Lack of shopping facilities	368
Lack of employment provision	366
Lack of affordable housing (rented / shared ownership housing)	240

Lack of allotment provision	207
Travelling a long distance to secondary school	163
Lack of market housing (for sale on the open market)	137

Question 2: Please rank the facilities below in order of importance.

Through looking at the data produced for question 2, it can be identified that the overall priorities for the residents of Southwater Parish are Hop Oast junction improvements (e.g. a filter lane for northbound traffic coming out of Southwater), a Countryside Enhancement Area and residual land to remain in agricultural use and improvements to water drainage and flooding prevention.

However, if you look further into the data produced, it is evident that priorities differ for the different age groups. For those aged under 16 the priorities are open space for sport, recreation and community uses (e.g. children's play areas), Countryside Enhancement Area and residual land to remain in agricultural use and pedestrian / cycle bridge over the A24, and crossings at Worthing Road and Church Lane.

For those aged between 16 and 21 the priorities are Hop Oast junction improvements (e.g. a filter lane for northbound traffic coming out of Southwater), open space for sport, recreation and community facilities (e.g. children's play areas), Countryside Enhancement Area and residual land to remain in agricultural use and pedestrian / cycle bridge over the A24, and crossings at Worthing Road and Church Lane.

For those aged between 22 and 44 the priorities are Hop Oast junction improvements (e.g. a filter lane for northbound traffic coming out of Southwater), open space for sport, recreation and community facilities (e.g. children's play areas) and Countryside Enhancement Area and residual land to remain in agricultural use.

For those aged between 45 and 65 and also aged 66 and above the priorities are Hop Oast junction improvements (e.g. a filter lane for northbound traffic coming out of Southwater), Countryside Enhancement Area and residual land to remain in agricultural use and improvements to water drainage and flooding provision.

Question 3: Having considered the level of community benefits, alongside your concerns of further development, which option do you consider most appropriate for the future of Southwater?

The total number of respondents to this questionnaire living within the Parish was 1,494. Of these 1,494, 9 did not respond to this question, 1,384 respondents feel that Option 1 (unplanned growth, reacting to developers' planning applications) is most appropriate for the future of Southwater, 28 respondents feel that Option 2 (approx 250 homes plus planning applications that will come forward) is most appropriate for the future of Southwater and 73

respondents feel that Option 3 (approx 500 homes) is most appropriate for the future of Southwater. There is therefore a large overall majority in favour of Option 1 – unplanned growth and reacting to developers planning applications.

Option	Totals
Option 1: Unplanned Growth	1,384
Option 2: approx. 250 homes	28
Option 3: approx. 500 homes	73

Conclusion

In conclusion to the overall questionnaire what concerns residents most about further development at Southwater is loss of countryside, traffic congestion and impact on character settlement. If development were to go ahead, the top three priorities for the residents of Southwater are Hop Oast junction improvements (e.g. a filter lane for northbound traffic coming out of Southwater), Countryside Enhancement Area and residual land to remain in agricultural use and improvements to water drainage and flooding prevention. Notwithstanding the above, there is a large overall majority in favour of Option 1 – unplanned growth and reacting to developers planning applications.

Question 1 responses within Parish

Analysis.: What concerns you about further development at Southwater?

Break.....: Age:

Filter.....: Postcode="RH13 9" OR Postcode="RH13 0"

Cells.....: Absolute, Respondents

	Base	Missing	Age:				
		No reply	Under 16	16-21	22-44	45-65	66+
Base	1494	-	144	68	454	566	262
Missing							
No reply	184	-	24	9	51	49	51
What concerns you about further development at Southwater?							
Traffic congestion	1140	-	88	49	357	465	181
Lack of open space for sports and recreation	707	-	76	26	236	270	99
Lack of shopping facilities	368	-	33	13	108	150	64
Lack of school places	427	-	47	11	189	130	50
Lack of safe places to play close to where you live	387	-	63	7	152	133	32
Waiting for doctor/dentist appointments	675	-	54	23	213	274	111
Inadequate drop off and pick up points next to the schools	473	-	45	11	162	172	83
Poor access to the countryside	671	-	66	30	239	252	84
Loss of countryside	1194	-	111	54	372	474	183
Travelling a long distance to secondary school	163	-	17	3	60	61	22
Lack of allotment provision	207	-	14	2	61	91	39
Poor cycle/pedestrian access across the A24	445	-	44	17	126	201	57
Poor drainage facilities	724	-	51	17	193	321	142
Lack of employment provision	366	-	27	17	98	169	55
Lack of affordable housing (rented / shared ownership housing)	240	-	15	10	56	115	44
Lack of market housing (for sale on the open market)	137	-	12	6	51	49	19
Impact on settlement character	968	-	79	37	287	403	162

Question 2 response - Under 16 (Parish)

Analysis.: Q2a to Q2n
 Filter.....: Postcode="RH13 9" OR Postcode="RH13 0" AND Age=1
 Cells.....: Absolute, Respondents

	Base	Missing														
		No reply	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Base	2016	1056	122	81	66	61	73	62	70	57	55	60	56	56	61	80
Hop Oast Junction improvements (e.g. a filter lane for northbound traffic coming out of Southwater)	144	76	8	9	5	6	5	3	2	7	3	5	4	5	1	5
Open space for sport, recreation and community uses (e.g. children's play areas)	144	66	25	15	11	4	11	4	-	1	4	1	1	-	1	-
Contribution towards improving healthcare facilities	144	77	5	6	9	5	8	6	11	2	5	2	5	1	-	2
Enhancements to Worthing Road	144	78	3	4	3	8	5	6	5	12	3	8	3	2	2	2
Improvements to Infant & Junior School drop off / pick up points	144	79	10	5	4	9	3	3	7	1	7	8	-	3	2	3
Improvements to the Downslink (e.g. resurfacing)	144	73	1	8	7	5	6	7	4	4	5	7	6	2	7	2
Land for and financial contributions towards a new secondary school	144	81	2	3	2	2	3	2	8	-	2	4	5	11	2	17
Countryside Enhancement Area and residual land to remain in agricultural use	144	67	38	10	6	3	3	2	2	6	3	2	2	-	-	-
Public footpath links to Lintot Square to/from development	144	79	2	4	1	3	2	7	6	5	5	8	8	7	2	5
Improvements to public footpaths	144	77	2	3	6	7	8	4	9	9	12	3	-	-	3	1
Pedestrian/cycle bridge over A24, and crossings at Worthing Road & Church Lane	144	75	12	2	4	7	10	6	3	4	3	3	10	3	1	1
Improvements to water drainage and flooding prevention	144	75	11	9	6	1	7	6	6	2	2	3	4	4	3	5
Affordable housing (rented / shared ownership housing)	144	76	3	2	2	1	1	4	2	2	-	5	4	6	17	19
Market housing (for sale on the open market)	144	77	-	1	-	-	1	2	5	2	1	1	4	12	20	18

Question 2 response - 16-21 (Parish)

Analysis.: Q2a to Q2n
 Filter.....: Postcode="RH13 9" OR Postcode="RH13 0" AND Age=2
 Cells.....: Absolute, Respondents

	Base	Missing														
		No reply	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Base	952	383	70	50	51	42	49	39	36	31	36	32	31	33	37	32
Hop Oast Junction improvements (e.g. a filter lane for northbound traffic coming out of Southwater)	68	24	10	4	1	7	1	5	2	2	2	1	5	1	2	1
Open space for sport, recreation and community uses (e.g. children's play areas)	68	28	8	5	9	3	4	3	1	1	2	2	-	1	-	1
Contribution towards improving healthcare facilities	68	27	6	5	3	9	3	5	5	2	-	1	-	-	2	-
Enhancements to Worthing Road	68	27	4	4	3	4	5	1	4	-	4	2	3	3	2	2
Improvements to Infant & Junior School drop off / pick up points	68	28	2	3	4	-	5	5	3	2	5	3	3	4	1	-
Improvements to the Downslink (e.g. resurfacing)	68	25	2	6	6	1	5	4	2	2	3	3	3	3	2	1
Land for and financial contributions towards a new secondary school	68	26	4	2	1	1	2	2	1	3	1	2	3	5	4	11
Countryside Enhancement Area and residual land to remain in agricultural use	68	28	12	3	3	3	7	4	4	1	1	-	2	-	-	-
Public footpath links to Lintot Square to/from development	68	29	3	1	2	-	3	2	1	6	4	4	4	4	2	3
Improvements to public footpaths	68	28	2	5	2	5	3	3	5	3	3	4	1	1	2	1
Pedestrian/cycle bridge over A24, and crossings at Worthing Road & Church Lane	68	26	8	1	7	4	5	1	-	4	3	5	-	2	1	1
Improvements to water drainage and flooding prevention	68	29	7	3	5	3	5	3	4	1	1	2	2	3	-	-
Affordable housing (rented / shared ownership housing)	68	29	2	4	3	1	-	1	4	1	5	1	1	3	8	5
Market housing (for sale on the open market)	68	29	-	4	2	1	1	-	-	3	2	2	4	3	11	6

Question 2 response - 22-44 (Parish)

Analysis.: Q2a to Q2n
 Filter.....: Postcode="RH13 9" OR Postcode="RH13 0" AND Age=3
 Cells.....: Absolute, Respondents

	Base	Missing														
		No reply	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Base	6356	2477	458	305	287	269	276	266	255	241	230	262	243	220	227	340
Hop Oast Junction improvements (e.g. a filter lane for northbound traffic coming out of Southwater)	454	170	56	33	30	21	11	16	16	15	16	23	6	16	6	19
Open space for sport, recreation and community uses (e.g. children's play areas)	454	169	48	53	30	33	24	27	14	9	9	10	9	5	5	9
Contribution towards improving healthcare facilities	454	178	25	26	38	26	36	22	24	18	14	13	9	8	10	7
Enhancements to Worthing Road	454	183	18	18	21	23	21	33	26	23	29	23	12	9	4	11
Improvements to Infant & Junior School drop off / pick up points	454	178	29	29	25	23	19	18	14	21	18	19	14	14	14	19
Improvements to the Downslink (e.g. resurfacing)	454	176	21	15	16	31	22	15	26	20	15	31	17	13	15	21
Land for and financial contributions towards a new secondary school	454	181	25	11	8	13	12	10	14	14	13	22	25	35	22	49
Countryside Enhancement Area and residual land to remain in agricultural use	454	153	144	34	20	13	15	11	20	12	6	5	11	4	1	5
Public footpath links to Lintot Square to/from development	454	187	11	6	13	8	12	20	15	22	26	29	38	24	15	28
Improvements to public footpaths	454	186	11	18	24	23	26	30	33	25	21	21	11	7	11	7
Pedestrian/cycle bridge over A24, and crossings at Worthing Road & Church Lane	454	175	23	19	17	16	25	25	16	22	28	22	31	20	5	10
Improvements to water drainage and flooding prevention	454	172	26	34	31	24	33	21	19	19	15	16	20	12	3	9
Affordable housing (rented / shared ownership housing)	454	185	14	5	3	7	6	12	8	9	5	16	17	19	59	89
Market housing (for sale on the open market)	454	184	7	4	11	8	14	6	10	12	15	12	23	34	57	57

Question 2 response - 45-65 (Parish)

Analysis.: Q2a to Q2n
 Filter.....: Postcode="RH13 9" OR Postcode="RH13 0" AND Age=4
 Cells.....: Absolute, Respondents

	Base	Missing														
		No reply	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Base	7924	3273	559	345	341	345	312	301	319	287	274	295	271	276	291	435
Hop Oast Junction improvements (e.g. a filter lane for northbound traffic coming out of Southwater)	566	214	85	49	42	27	19	22	14	17	13	11	11	22	5	15
Open space for sport, recreation and community uses (e.g. children's play areas)	566	234	36	39	27	48	33	21	28	22	20	24	8	14	4	8
Contribution towards improving healthcare facilities	566	241	40	25	31	29	38	24	30	23	28	15	19	9	4	10
Enhancements to Worthing Road	566	233	19	21	29	31	25	31	24	32	35	27	10	14	11	24
Improvements to Infant & Junior School drop off / pick up points	566	239	26	12	22	21	24	23	30	24	32	27	20	19	20	27
Improvements to the Downslink (e.g. resurfacing)	566	235	11	26	25	22	27	29	30	22	25	28	32	10	17	27
Land for and financial contributions towards a new secondary school	566	252	20	3	11	9	5	10	10	17	6	17	39	40	34	93
Countryside Enhancement Area and residual land to remain in agricultural use	566	208	171	38	24	25	22	20	11	8	9	5	6	6	2	11
Public footpath links to Lintot Square to/from development	566	247	11	6	7	12	17	24	28	20	25	38	39	34	34	24
Improvements to public footpaths	566	233	15	26	33	39	25	37	34	29	27	23	11	10	11	13
Pedestrian/cycle bridge over A24, and crossings at Worthing Road & Church Lane	566	227	37	28	28	30	27	18	32	24	19	25	20	21	13	17
Improvements to water drainage and flooding prevention	566	226	61	54	44	28	31	19	27	22	12	14	10	7	1	10
Affordable housing (rented / shared ownership housing)	566	235	21	14	15	13	10	13	10	17	16	16	17	35	65	69
Market housing (for sale on the open market)	566	249	6	4	3	11	9	10	11	10	7	25	29	35	70	87

Question 2 response - 66+ (Parish)

Analysis.: Q2a to Q2n
 Filter.....: Postcode="RH13 9" OR Postcode="RH13 0" AND Age=5
 Cells.....: Absolute, Respondents

	Base	Missing														
		No reply	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Base	3668	1965	184	144	130	124	119	110	107	98	102	112	98	100	102	173
Hop Oast Junction improvements (e.g. a filter lane for northbound traffic coming out of Southwater)	262	136	20	19	8	11	16	14	6	6	4	5	2	4	5	6
Open space for sport, recreation and community uses (e.g. children's play areas)	262	143	7	8	9	16	16	6	16	9	10	7	3	4	3	5
Contribution towards improving healthcare facilities	262	137	14	15	13	13	9	8	7	13	6	10	6	3	1	7
Enhancements to Worthing Road	262	140	4	12	14	12	5	6	10	12	19	7	5	3	5	8
Improvements to Infant & Junior School drop off / pick up points	262	139	8	8	15	10	8	10	10	11	5	14	7	3	8	6
Improvements to the Downslink (e.g. resurfacing)	262	140	4	7	8	10	7	17	5	11	11	8	8	9	6	11
Land for and financial contributions towards a new secondary school	262	150	4	6	2	-	2	2	5	3	8	13	7	12	7	41
Countryside Enhancement Area and residual land to remain in agricultural use	262	127	62	19	13	7	9	2	3	2	1	6	4	1	3	3
Public footpath links to Lintot Square to/from development	262	148	2	1	5	5	5	9	8	11	11	9	15	14	8	11
Improvements to public footpaths	262	141	8	6	13	11	11	19	12	8	10	6	6	5	2	4
Pedestrian/cycle bridge over A24, and crossings at Worthing Road & Church Lane	262	142	7	1	11	7	12	7	17	8	3	5	10	11	9	12
Improvements to water drainage and flooding prevention	262	129	32	36	9	13	11	6	3	1	7	3	6	1	-	5
Affordable housing (rented / shared ownership housing)	262	142	11	5	4	4	7	3	3	1	5	12	11	19	19	16
Market housing (for sale on the open market)	262	151	1	1	6	5	1	1	2	2	2	7	8	11	26	38

Question 3 response by Age (Parish)

Analysis...: Having considered the level of community benefits, alongs...

Break.....: Age:

Filter.....: Postcode="RH13 9" OR Postcode="RH13 0"

Cells.....: Absolute, Respondents

	Base	Missing	Age:				
		No reply	Under 16	16-21	22-44	45-65	66+
Base	1494	-	144	68	454	566	262
Missing							
No reply	9	-	-	2	-	4	3
Having considered the level of community benefits, alongs...							
Option 1 - unplanned growth, reacting to developers' planning applications	1384	-	139	61	424	522	238
Option 2 - approx 250 homes plus planning applications that will come forward	28	-	4	-	8	9	7
Option 3 - approx. 500 homes	73	-	1	5	22	31	14

Strategic Planning Advisory Group

14th June 2011

Agenda Item 4

Revised Statement of Community Involvement

1. Introduction

1.1 As previously reported to Members, following the adoption of the Council's Statement of Community Involvement (SCI) in 2006 and reviewed in 2007 there have been further changes to the planning system, particularly regarding the production of Local Development Framework (LDF) documents.

1.2 Additionally, the statutory duty on all local authorities to consult 'representatives of local persons' on the exercise of their functions, called the 'Duty to Involve, Consult and Inform', came into force after the Council's SCI was published. However, the government is planning to remove this duty as part of its review of statutory duties and guidance on consultation.

1.3 For some time the Council has been trying to increase its understanding of the needs of local people and strengthen relationships with local communities. This has been included as a priority in the District Plan 2011-15, including "identifying and understanding the needs of vulnerable people and those who have difficulty accessing services".

1.4 Members will be aware from previous Officer reports and briefings that the matters identified above have stimulated the review of the current adopted Statement of Community Involvement. This report sets out in general terms the policy background and the steps your Officers have taken in preparing and consulting upon the revised document ready for adoption by the Council.

2. Policy Background

2.1 The Statement of Community Involvement is a key document in the Local Development Framework (LDF) setting out how the community within and

adjoining the District, as well as organisations and other stakeholders will be involved in the production of LDF documents, as well as Development Management applications in the District.

- 2.2 The Council's LDF provides the policy framework for future strategic planning in the District. A requirement under the Planning and Compulsory Purchase Act 2004, which introduced the duty to produce Local Development Frameworks, was the production of a Statement of Community Involvement. The Council started work on this document immediately as it would underpin the production of all LDF documents. It was adopted by the Council in 2006 following consultation, and clearly set out the LDF process, consultation stages and methods of consultation to help the community in understanding what was at the time a new planning system and how to get involved.
- 2.3 This document had to be reviewed the following year following a change in requirements by the Government Office for the South East. Amendments were made principally to allow the consultation methods to be more generic rather than tailored to individual documents. The changes were aimed at extending the life of the SCI, so that it would not have to be reviewed on an annual basis to reflect any changes that may be made in the annual review of the Local Development Scheme.
- 2.4 A second review of the document is necessary following updates to the Planning and Compulsory Purchase Act made in 2009, which changed the stages of local development document production. The current adopted 2007 SCI is therefore now factually incorrect in certain respects and a review gives an opportunity for the Council to re-examine how it intends to engage with the community on a wider basis.
- 2.5 The updates to the Planning and Compulsory Purchase Act made in 2009 also removed the requirement for the Statement of Community Involvement to be Independently Examined before adoption. Therefore, following a consultation process, the Council will be asked to formally adopt the document. It will then replace the current 2007 adopted Statement of Community Involvement.

2.6 The previous government sought to increase public participation in decision-making through legislation. Following the General Election last year and the establishment of the Coalition Government, two pieces of that legislation are still in place:

- 2007 Local Government & Public Involvement in Health Act, which introduced the 'duty to involve', and
- 2009 Local Democracy, Economic Development & Construction Act, which extended the 'duty to involve' to the police

2.7 The 2007 'Duty to Involve', which came into force on 1st April 2009, requires local councils to 'embed a culture of engagement and empowerment' and was the subject of a report to Cabinet in October 2009. It is meant to cover routine issues as well as significant one-off decisions. This means that there are few areas where the duty does not apply. Statutory guidance makes it clear that authorities will need to demonstrate that:

- They understand community interests
- Information, consultation and involvement opportunities are accessible and well targeted
- Engagement activities are co-ordinated with their partners wherever possible, and
- Local people know how to get involved and feel that engagement opportunities are well planned and effective

2.8 However, while the Coalition Government has stated that it is committed to localism and increasing community participation, it has announced its intention to revoke the 'Duty to Involve'. Nevertheless, the four points above have provided a useful framework for testing the Council's engagement practices during this review.

3. Understanding the needs of Local People in Horsham District

3.1 The Council has taken steps to map 'diversity' in the District and has lent its support, through the Horsham District Community Partnership, to the West Sussex Community Engagement Project, a pan-West Sussex project to map the engagement activities of the main public sector bodies (Local Authorities, Police, NHS, Fire & Rescue), define and identify 'hard-to-reach' groups

across the county, and establish a common set of engagement principles that all bodies can support.

- 3.2 Last year, the Council reviewed all parish and town partnership plans across the District in order to capture and analyse the aims and objectives for each parish, to inform both its Corporate Plan and the Horsham District Sustainable Community Strategy (*All Our Futures*) produced with its partners in Horsham District Community Partnership. The Council recently adopted the District Plan 2011-15 which prioritises working closely with local communities “to understand their needs and deliver appropriate services”, especially the needs of “vulnerable people and those who have difficulty accessing services”.

4. Consultation Process

- 4.1 A new requirement to notify specific bodies of the intention to prepare a Statement of Community Involvement set out in the updates to the Planning and Compulsory Purchase Act made in 2009 was addressed early in the review process. This gave specific bodies the opportunity to comment on what they consider the contents of the statement should include.
- 4.2 Officers took into account comments received through this process as well as comments of Members, Council departments and other consultees. The Strategic Planning Advisory Group considered the content of the revised Statement of Community Involvement following this early consultation and recommended to the Cabinet Member for Strategic Planning that it be approved by Council for consultation. The consultation on the Draft Revised SCI lasted 8 weeks, from the 21st January to the 18th March, alongside the consultation on the Draft Interim Statement: Managing Development in Horsham District.
- 4.3 Consultation exhibitions were attended by Officers and meetings were held with a number of ‘hard-to-reach’ or ‘seldom heard’ groups to discuss the consultation and ensure they were able to give their views.
- 4.4 Officers have taken into account comments received through this wider consultation process and suggested changes to the document in light of these

comments. The results of the consultation, including the special series of meetings with representatives of 'hard-to-reach' or 'seldom heard' groups, are set out in Appendix 1, together with indications as to which comments have been incorporated into the latest version of the Statement of Community Involvement. It is proposed that the Strategic Planning Advisory Group consider the contents of the revised Statement of Community Involvement and recommend to the Cabinet Member for Living and Working Communities that it be approved for consideration and adoption by Council.

Report authors: Julian Carrington (x5184) and Caroline West (x5276)

Appendix 1 - Results of Consultation and Schedule of Changes

External representations were received from 10 external individuals and organisations on the Revised Draft Statement of Community Involvement, as well as feedback from the following representatives of 'seldom heard' groups:

Representative body	Method of consultation
Senior Persons Council	Meeting
Equalities Forum	Meeting
HYPER	Meeting

The comments received from these groups directly related to the Statement of Community Involvement were:

Page	Policy/ Para	Comment and reason for no change
31	Appendix 1	Concerns about length of consultations, even eight weeks is tight for Parish Council's to respond, the contact with Parish Council's also needs to be stronger. No change to the document. Six weeks is the statutory length of consultation, the Council makes documents available in draft form before consultations when taken to committees and Council to approve for consultation and has extended a recent consultation to 8 weeks due to requests.
n/a	n/a	Concerns about the publication of consultations, the ease of reading the documents and the notice taken of comments received. No change to the document. Consultations are very important for the Council and taken seriously, comments on documents are taken on board and changes made where considered appropriate.
n/a	n/a	Observation that language needs to be kept simple in documents and summaries wherever possible as help engage a wider number of the community. Considered current consultation document easy to navigate and comment on. No change to document however comments taken on board, summaries are often produced of technical documents and paragraph 4.11 of the documents states that all documents will be written in plain English avoiding jargon wherever possible and available in other formats on request.
n/a	n/a	Concerns about the timings of consultations and holiday periods. No change to the document. The Council is careful to avoid holiday periods when consulting on Local Development Framework documents, particularly the summer holidays. If consulting over a holiday period the 6 week period ensures several weeks are outside this period

Page	Policy/ Para	Comment and reason for no change
		and documents are made available as soon as possible for consideration.
n/a	n/a	It was considered that feedback of consultation results is vital. No change to the document. Feedback on consultations is always given with reports to relevant committees; this point is taken on board though.
n/a	n/a	Access concerns for some groups to the internet so vital to maintain other ways of accessing information and commenting. However another group supported the use of the internet and social networking sites to engage the community, with clear links to documents and how to comment. No change to the document .The Council through the document commits to making ensuring all members of the community can be actively involved in consultations and this will continue, learning from feedback and adjusting consultation practices and places to promote consultations.
n/a	n/a	Use should be made of the e-panel in the Horsham area, phone surveys during consultations also use Community Profile to target hard to reach groups. No change to the document however will consider this additional consultation method in future consultations.
n/a	n/a	Support was given to the document in that it encourages consultation with the wider community and the evolution of consultation techniques and practices over time and for different documents.
n/a	n/a	Use hard to reach groups to identify other forms of consultation and publicise events, further consideration should also be given to where consultations are advertised. No change to the document. These meetings are one way to identify best forms of consultation and also through work with the Local Strategic Partnership. Use of these groups to advertise events will be utilised for consultations where appropriate and increased use of other venues to advertise events will be considered such as secondary schools and colleges.

Below are details of the formal comments received and the changes made to the document in consequence, recommended for adoption. A number of representations received were general observations or support for the document containing no suggested changes.

It was considered that a small number of suggested changes to the document were not needed, and these are set out below:

Page	Policy/ Para	Comment and reason for no change
31	Appendix 1	Request for an LDF alert system to inform those on the database of consultations. No change as this is already in place.
n/a	n/a	Comment on the organisation of arts and heritage events. No change needed to the SCI, however passed to Leisure Services for their information when arranging such events in the District.
n/a	Chapter 6	Consult Southern Water on Major Planning Applications and report back how views expressed in representations are incorporated into the decision making process. No changes to the SCI as Southern water are already consulted on major applications as a requirement and reports back responses to consultation in Committee Reports.
40	Appendix 3	Why are the only named organisations the South Downs National Park and the Guild of Travelling Showmen. No change made, specific consultation bodies are not named as these often change/ are added to and would date the document. The LDF database is updated regularly with individuals and groups wishing to be kept informed of the LDF.
19	4.4	Change or removal of reference to Planning Aid due to uncertainty of funding. No change made as recently funding was secured by the Royal Town Planning Institute for £1m to enable the voluntary organisation to continue.

Below are changes to the document expressed either in the conventional form of strikethrough for deletions or underlining for additions of text.

Page	Policy/ Para	Change and reason for change
31-35	Appendix 1	Specify which stakeholders to be consulted at what stages. All those on the consultation database are informed of consultations on LDF document. Further local stakeholders/ interested parties are consulted however these are determined by the content of the document and their relevance. Insertion of text at the top of the Appendix 1 <u>For a list of specific consultation bodies and other general organisations see Appendix 3.</u>
31-35	Appendix 1	State the length of consultation stages where not already stated. Change made to add <u>normally a six week period of consultation</u> in the Early Involvement/ Options Stage of DPD production and <u>Formal consultation period on Proposed Submission final SA/SEA over a six-week period</u> changed from current text in the Proposed Submission

Page	Policy/ Para	Change and reason for change
		stage to make it clearer for the public.
n/a	n/a	The emerging concept of Localism should be reflected in the document. The Localism Bill is at its early stages of passage through Parliament and it would pre-empt changes coming through this Bill to make specific references in the SCI as drafted. However an additional paragraph added after 2.13 <u>Changes coming forward in planning encourage greater community involvement and empowerment, maximising participation in many areas including plan making. The Statement of Community Involvement encourages wide spread consultation and public participation in the planning process. This document will be considered when working with communities and stakeholders on any new initiatives which may come forward.</u>

Further changes made by Officers

Page	Policy/ Para	Change and reason for change
24	5.7	Change first sentence to read <u>The Strategic Planning Team also utilises some of the time of specialist Design and Conservation, Landscape and Arboricultural officers in Development Management.</u>
25	6.3	First sentence removed notices and all relevant planning applications on the website replaced with <u>all relevant applications</u> . This change is to make it clearer to the public what is available on the website.
25	6.4	Removed Any applicant submitting an application received an information leaflet regarding planning applications. The leaflet will be updated to include the information on further community involvement. This practice has been ceased and since it was ceased no requests for the leaflet have been made. The leaflet is still available if requested.
25	6.5	Removed with a maximum of three objectors, three supporters and one Parish and Neighbourhood Council representative. Additional wording added to sentence <u>subject to a limited number</u> before reference to the list operates on a first come first served basis. The detailed specifics of speakers at Committee procedures are provided in the leaflet identified later in the paragraph.
26	6.6	Paragraph removed. Information available online and leaflets on specific areas referred to previously in the text as well as contact telephone numbers.
26	6.7	Lower case ' <u>s</u> ' on statutorily on the 1 st line.
26	6.9	Addition of <u>Where appropriate</u> at the beginning of the 1 st

Page	Policy/ Para	Change and reason for change
		sentence of the paragraph. Also additional sentence at the end of the paragraph <u>Alternatively if appropriate a site notice may be displayed.</u> In change is in order to ensure the process is clear to the public regarding site notifications including notices.
26	6.11	Removed All site notices, newspaper advertisements and neighbourhood notifications will give 21 days to make comments replaced with <u>Members of the public will be given 21 days to make comments on new planning applications.</u> This change ensures the process is clear to the public regarding making comments to new planning applications.
27	6.14	Remove page 23 and replace with <u>page 25</u>
28	6.19	Remove Consideration of such matters under delegated powers is removed where a person makes a representation and wishes to address the relevant Committee. Replace with <u>There are circumstances set out in the Scheme of Delegation whereby powers to consider matters under delegated powers can be removed with the result that an application is determined by the relevant Committee.</u> Changed as the Scheme of Delegation sets out the position clearly and may be updated over time.
28	6.20	Add <u>'s'</u> after Committees on 8 th line.
28	6.21	Remove and all those individuals who submitted comments about the application replaced with <u>/agent</u> . The process the Council follows has changed, instead the letter sent to all those who make comments on planning applications are sent a letter which acknowledges their comments and informs them where to track the application.
28	6.21	Additional second sentence <u>This will also be available for public inspection.</u>
28	6.22	Remove planning from the 1 st line and replace a with <u>an</u> . Notification of decisions for all applications so the change makes this clearer.
28	6.22	Remove all those persons who submitted comments about the application replace with <u>the applicant/agent</u> . The process the Council follows has changed, instead the letter sent to all those who make comments on planning applications are sent a letter which acknowledges their comments and informs them where to track the application.
29	6.22	Removed last sentence The reasons for refusal will be given or the full text of conditions imposed where permission is granted. It will also state where full copies of the Council's decision can be viewed. Considering the previous change and the following paragraph which states where information can be found for the application decisions this has been removed.

Page	Policy/ Para	Change and reason for change
29	6.24	Remove and environment from 3 rd line.
39	Appendix 3	Move South Downs National Park Authority from the list of 'Other Groups and Organisations' to a new 8 th bullet point on the list of 'Specific Consultation Bodies'.

Strategic Planning Advisory Group

14th June 2011

Agenda Item 5

Response to “Planning for traveller sites: Consultation”, Department for Communities and Local Government (DCLG) April 2011

1. Introduction

1.1 The aim of this report is to provide SPAG with an outline of the contents of the consultation paper, “*Planning for traveller sites*”, and to consider the questions in the paper so that the Council can formally respond to DCLG by the 6th July 2011. The whole document can be viewed on the DCLG website at www.communities.gov.uk/publications/planningandbuilding/travellersitesconsultation. Annex A, the Draft Planning Policy Statement is attached to this report.

2. Background

2.1 For the benefit of new members, the currently national guidance on Gypsy & Travellers and Travelling Showpeople takes the form of two circulars: Circular 01/2006, *Planning for Gypsy and Traveller Caravan Sites* and Circular 04/2007, *Planning for Travelling Showpeople*. The consultation is to consider the details of a proposed new, single Planning Policy Statement that will replace the existing Circulars.

2.2 The Circulars currently refer to the requirement to carry out Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessments. These are required to feed into policies made at Regional level to give District targets and then policies would be made at local level to follow targets and identify sites. The West Sussex Gypsy and Traveller Accommodation Needs Assessment (GTAA) 2007 identified a need for 39 pitches within Horsham District up to 2011. The Travelling Showpeople Needs Study indicated a possible need for 2 pitches. These figures were used to inform a draft policy (H7) as part of a Partial Review of the South East Plan, which took the figures, benchmarked them, extrapolated them up to 2016 and added an element of redistribution; a figure of 50 Gypsy and Traveller pitches and 5 Travelling Showpeople pitches was given for Horsham. An Examination in Public into the

draft policy took place in February 2010. However, before the report was issued the Government announced the abolition of the South East Plan and work on the policy was dropped. Subsequently the abolition was found to be unlawful; however, the dissolution of the South East England Partnership Board meant that the work was not carried forward. The abolition of the Regional Spatial Strategies, including the South East Plan, now appears in the Localism Bill, which is currently expected to gain Royal Assent in November therefore there is a clear need to update the Circular guidance.

2.3 The Government's intention through the Localism Bill and this proposed planning policy statement is to 'allow councils to decide for themselves how many traveller pitches are necessary in their area according to local need and historic demand', replacing the Circulars with 'light-touch guidance outlining council's statutory obligations'.

2.4 It is worth noting here that the Government advises that this consultation document should be read in the context of a range of broader policy initiatives in relation to traveller communities that have been announced. The overall package of measures is intended to ensure fair treatment for those in traveller and settled communities who play by the rules.

3. The Consultation; 'Planning for traveller sites' and the Council's proposed response.

3.1 The Consultation document sets out **13 key questions** that it would particularly like views on. It is intended to go through these in turn making a suggested response and then go through any further points that it considered should be commented on.

3.2 **Q1 : Do you agree that the current definitions of "gypsies and travellers" and "travelling showpeople" should be retained in the new policy?**

Response: The Council considers the current definitions acceptable.

3.3 **Q2 : Do you support the proposal to remove the specific reference to *Gypsy and Traveller Accommodation Needs Assessments* in the new policy and instead refer to a "robust evidence base"?**

Response: The Council raises no objection to the removal of specific reference to GTAA's; replacing it with "robust evidence base". *(In reality the requirement for a robust evidence base will mean that a GTAA will still be required, although it may be given a different title, and will not have to follow a prescribed form. It is noted that the GTAA carried out for west Sussex was criticised by the inspectors at the examination In public into the South East Plan policy, whereas the more simple style count approach carried out by Chichester was viewed more favourably).*

3.4 Q3: Do you think that local planning authorities should plan for "local need in the context of historical demand"?

Response: It is considered acceptable that LPA's should plan for local need. It is not made clear what is meant by "in the context of historical demand": however, providing this means that the LPA can look at local needs that have come from within the District from established families/groups, it is considered acceptable. Any targets included in the Local Development Framework should reflect up-to-date current and future needs.

3.5 Q4: Do you agree that where need has been identified local planning authorities should set targets for the provision of sites in their local planning policies?

Response: The setting of targets within local planning policies is considered an acceptable way forward and will give clear direction. This target needs to be on the basis of an up-to-date assessment of the current local need. Moreover, whilst likening the provision of 'traveller' sites to housing, there is a difference, which needs to be acknowledged.

3.6 Q5: Do you agree with the proposal to require local planning authorities to plan for a five-year supply of traveller pitches/plots?

Response: In light of the differences between 'normal' housing and the provision of traveller pitches, and anticipated difficulties in implementing such an approach, an objection is raised to this proposal. It is considered that the 'target' should be met within the plan period, which would allow some flexibility in the timing of bringing forward sites and ensure that the most appropriate sites in the district are developed.

3.7 **Q6: Do you agree that the proposed wording of Policy E (in the draft policy) should be included to ensure consistency with Planning Policy Guidance 2: *Green Belts*?**

Response: There is concern that this approach will lead to additional pressure on rural districts, such as Horsham, from any potential undersupply of pitches in adjoining Surrey districts to the north. This concern is heightened by the newly created South Downs Park to the south and east of the District; the SDNPA may seek to resist new sites.

3.8 **Q7: Do you agree with the general principle of aligning planning policy on traveller sites more closely with that for other forms of housing?**

Response: Yes, to a certain extent: however, there are or could be differences, for instance, what is considered acceptable in terms of the 'sustainability' of a location.

3.9 **Q8: Do you think the new emphasis on local planning authorities consulting with both settled and the traveller communities when formulating their plans and determining individual planning applications will reduce tensions between these communities?**

Response: The emphasis on consultation with both communities is applauded and it is hoped that it will reduce tensions: however, often tensions run deep and the reality may not live up to theory. More work is required in the round to overcome such tensions.

3.10 **Q9: Do you agree with the proposal in the transitional arrangements policy (paragraph 26 of the draft policy) that asks local planning authorities to "consider favourably" planning applications for the grant of temporary permission if they cannot demonstrate an up-to-date five-year supply of deliverable traveller sites to ensure consistency with Planning Policy Statement 3: *Housing*?**

Response: There are a number of interconnected issues here. There is concern that in reality the granting of a temporary permission will lead to a permanent permission, particularly where a family settles on the site and children attend schools etc. This has been this Council's experience. When considering housing proposals under paragraph 71 of *PPS3; Housing*, paragraph 69 is also applicable. It appears that where there isn't a five year supply of deliverable sites, the criteria in paragraph 69 would not have to be

applied before granting a temporary permission; again leading to concerns that sites in inappropriate locations will ultimately secure permanent permissions. In the case of retrospective applications, there is the opposite concern that because changes to national planning guidance discourage the submission of retrospective applications and allow planning authorities to take enforcement action more readily, suitable sites may be refused permission.

3.11 Q10: Under the transitional arrangements, do you think that six months is the right time local planning authorities should be given to put in place their five-year land supply before the consequences of not having done so come into force?

Response: The six month timescale proposed is considered completely unrealistic and cannot be met.

3.12 Q11: Do you have any other comments on the transitional arrangements policy?

Response: None, other than to reiterate the above.

3.13 Q12: Are there any other ways in which the policy can be made clearer, shorter or more accessible?

Response: Although a relatively short document, it deals with lots of complex issues and concepts, therefore it may not be understood by people not normally engaged in the planning process. A pictorial representation of the Policy, and/or audio/DVD format would make it easier for the large number of Gypsy and Travellers who are purported to have literacy issues. Consultation with travellers and settled communities should help to identify issues in this respect.

3.14 Q13: Do you think that the proposals in this draft statement will have a differential impact, either positive or negative, on people because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation? If so, how in your view should we respond? We are particularly interested in any impacts on (Romany) Gypsies and (Irish) Travellers and welcome the views of organisations and individuals with specific relevant expertise. (A draft Equalities Impact Assessment can be found at Annex C.)

Response: From our perspective it is difficult to give a clear answer to this, because for example the needs of older travellers and younger travellers will

differ. The Government should nevertheless seek to address this issue through this consultation.

3.15 Other comments:

- The guidance will set a framework for addressing Gypsy and Traveller and Travelling Showpeople site provision once the Regional Spatial Strategies have been abolished.
- The distinction between Gypsy and Travellers and Travelling Showpeople, despite the separate definitions being given, does not form part of the document. These two distinct groups do have differing needs, which are not acknowledged, and probably should be.
- There is no requirement for work to be carried out at 'larger than local' level, which may be beneficial, particularly when considering transit sites for instance.
- The concerns expressed by others regarding the fact there is a backlog of provision and that this 'localised' approach may result in less provision than would have come about via the Regional Strategies is acknowledged. It is important that all authorities carry out work to establish local needs and that all authorities are required to do this in a similar way, so that the process is seen to be 'fair' across the country.

4.0 Next Steps.

- 4.1 The consultation ends on the 6th July 2011. It is therefore proposed that subject to Members comments arising at this meeting, the above responses are sent to the Department for Communities and Local Government as the Council's formal response.

Annex A

Planning for traveller sites

Contents

Introduction

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Policy C: Sites in rural areas and the countryside
Policy D: Rural exception sites
Policy E: Traveller sites in Green Belt
Policy F: Mixed planning use traveller sites
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Development management

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Transitional arrangements

Annex A: Definitions

Introduction

Application of this planning policy statement

1. Planning policy statements set out the Government's national policies on different aspects of spatial planning in England. This document sets out planning policies for planning for traveller sites. These policies complement but do not replace or override other national planning policies and should be read alongside other relevant statements of national planning policy.
2. The plan making policies in this Statement should be taken into account by the Mayor of London in relation to the spatial development strategy for London, and by local planning authorities in the preparation of their development plan. The preparation of development plans should not be delayed to take the policies in this statement into account.
3. The policies in this Statement are a material consideration which must be taken into account in development management decisions, where relevant¹. The development management policies in the statement can be applied directly by the decision maker when determining planning applications. It is only necessary for the development plan to reformulate development management policies in this Statement² if there are specific factors justifying variation of these policies.

The government's objectives for traveller³ sites

4. The Government's overarching objective is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.
5. To help achieve the above objectives the Government's objectives for planning in respect of traveller sites are to:
 - enable local planning authorities to make their own assessment of need for the purposes of planning
 - ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
 - encourage local planning authorities to plan for sites over a reasonable timescale
 - protect Green Belt from development

¹ See section 38(6) of the *Planning and Compulsory Purchase Act 2004*.

² See paragraph 4.31-4.32 of *Planning Policy Statement 12: Local Spatial Planning*.

³ See Annex A for the definition of traveller for the purposes of this Statement.

Draft Planning Policy Statement

- promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites
- reduce the number of unauthorised developments and encampments and make enforcement more effective
- ensure that the development plan includes fair, realistic and inclusive policies
- increase the number of traveller sites, in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- reduce tensions between settled and traveller communities in plan making and planning decisions
- enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- have due regard to the protection of local amenity and local environment

Using evidence

Policy A: using evidence to plan positively and manage development

6. In assembling the evidence base necessary to support their planning approach, local planning authorities should:
 - a) pay particular attention to early and effective community engagement with both settled and traveller communities
 - b) co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan in the light of historical demand; and
 - c) use a robust evidence base to establish need to inform the preparation of the development plan and make planning decisions
7. Local planning authorities should, to inform policy development, monitor and critically analyse decisions on applications for sites for travellers compared to those of applications for other types of residential development and other types of caravan site.

Plan making policies

Policy B: planning for traveller sites

8. Local planning authorities should set pitch and plot targets⁴ which address the likely permanent and transit site accommodation needs of travellers in the light of historical demand.
9. Local planning authorities should, in producing their development plan:
 - a) set out their policies and strategies for delivering their locally set targets, including identifying specific sites that will enable continuous delivery of sites for at least 15 years from the date of adoption
 - b) identify sufficient specific deliverable sites to deliver site need in the first five years (to be considered deliverable, sites should, at the point of adoption of the relevant policy: be available – the site is available now; be suitable – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities; be achievable – there is a reasonable prospect that housing will be delivered on the site within five years)
 - c) in determining how much land is required, not include sites for which they have granted planning permission unless they can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to delivering locally set targets at the point envisaged
 - d) allow for provision to be made for other family members who may not themselves physically move their own accommodation onto the site
 - e) consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area
 - f) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density
 - g) protect local amenity and environment
10. Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward.
11. Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:
 - a) promote peaceful and integrated co-existence between the site and the local community

⁴ See Annex A for definitions of 'pitch' and 'plot'.

- b) promote easier access to health services
- c) ensure that children can attend school on a regular basis
- d) provide a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment
- e) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
- f) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability

Policy C: sites in rural areas and the countryside

12. When assessing the suitability of sites in rural or semi-rural settings, local authorities should ensure that the scale of such sites does not dominate the nearest settled community.

Policy D: rural exception sites

13. If there is a lack of affordable land to meet local traveller needs, local planning authorities in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable traveller sites, including using a Rural Exception Site Policy for traveller sites that should also be used to manage applications. A Rural Exception Site Policy enables small sites to be used, specifically for affordable traveller sites, in small rural communities⁵, that would not normally be used for traveller sites. Rural exception sites should only be used for affordable traveller sites in perpetuity. A Rural Exception Site Policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities.

Policy E: traveller sites in green belt

14. There is a general presumption against inappropriate development within Green Belts. Traveller sites in the Green Belt are inappropriate development, within the meaning of Planning Policy Guidance 2: *Green Belts*.
15. Detailed Green Belt boundaries defined in adopted development plans or earlier approved plans should be altered only exceptionally. If a local planning authority wishes to make an exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and

⁵ Small rural settlements have been designated for enfranchisement and right to acquire purposes (under Section 17 of the *Housing Act 1996*) by SI 1997/620-25 inclusive and 1999/1307.

not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.

Policy F: mixed planning use traveller sites

16. Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. Local planning authorities should consider the scope for identifying separate sites for residential and for business purposes in close proximity to one another if mixed sites are not practicable.
17. Local planning authorities should have regard to the need that travelling showpeople have for mixed-use yards to allow residential accommodation and space for storage of equipment.
18. Local planning authorities should not permit mixed use on rural exception sites.

Policy G: major development projects

19. Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site. Local planning authorities are entitled to expect the applicant to identify and provide an alternative site, providing the development on the original site is authorised.

Development management policies

Policy H: determining planning applications for traveller sites

20. Local planning authorities should consider the following issues when considering planning applications for traveller sites:
 - a) the existing level of local provision and need for sites
 - b) the availability (or lack) of alternative accommodation for the applicants
 - c) other personal circumstances of the applicant
 - d) that the locally specific criteria used to guide the allocation of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites
 - e) that they should determine applications for sites from any travellers and not just those with local connections

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21. If local planning authorities have an up-to-date five year supply of deliverable sites and applications come forward for sites that are allocated in the overall land supply, but which are not yet in the up-to-date five year supply, they should consider whether granting permission would undermine achievement of their policy objectives.
22. Local planning authorities should strictly limit new development in open countryside that is away from existing settlements or outside areas allocated in the development plan. However, they should recognise that some rural areas may be acceptable for some forms of traveller sites. Local authorities should ensure that sites in rural areas respect the scale of, and do not dominate the nearest settled community, and avoid placing an undue pressure on the local infrastructure.
23. Local planning authorities should look favourably upon applications that:
 - a) involve the development of previously developed (brownfield), untidy or derelict land
 - b) are well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness
 - c) ensure adequate landscaping and play areas for children
 - d) do not enclose a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community
24. Local planning authorities should consider how they could overcome planning objections to particular proposals using planning conditions or planning obligations including:
 - a) limiting which parts of a site may be used for any business operations, in order to minimise the visual impact and limit the effect of noise
 - b) specifying the number of days the site can be occupied by more than the allowed number of caravans (which permits visitors and allows attendance at family or community events)
 - c) limiting the maximum number of days for which caravans might be permitted to stay on a transit site
25. Local planning authorities should determine applications for sites from any travellers and not just those with local connections.

Transitional arrangements

26. This planning policy statement comes into effect immediately. From [the date six months after date policy comes into effect], if a local planning authority cannot demonstrate an up-to-date five year supply of deliverable sites, it should consider favourably applications for the grant of a temporary planning permission⁶.

⁶ Policy on the use of temporary permissions is set out in *Circular 11/1995 The Use of Conditions in Planning Permission*.

Annex A: definitions

1. For the purposes of this planning policy statement “gypsies and travellers” means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

2. For the purposes of this planning policy statement, “travelling showpeople” means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.

3. For the purposes of this planning policy statement, “travellers” means “gypsies and travellers” and “travelling showpeople” as defined above.
4. For the purposes of this planning policy statement, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use plots for “travelling showpeople”, which may/will need to incorporate space or to be split to allow for the storage of equipment.

