



DRAFT FOR APPROVAL

19/02/2020

HDC Local Plan Review – Regulation 18 Consultation - February 2010

Summary and conclusions

- Warnham Parish Council (WPC) completed its neighbourhood plan (WNP) to 2031 only 8 months ago and is disappointed that it is now necessary to undertake a review.
- In acknowledgment that the Local Plan horizon is now extended by 5 years to 2036 and that government direction requires HDC to plan for an increased housing demand WPC accepts that the parish housing number may need to be increased from that in the WNP.
- WPC does not accept that an extra 50 housing units is a justifiable additional allocation to the parish for 5 years extension to the plan but could sustain an increase of 20 units in the extra 5 years of the plan – 2031 to 2036.
- In 2019 (within the Local Plan period) 20 housing units were constructed and occupied in Warnham, which already meets the extra housing numbers identified by WPC.
- The site SA070 – Land North of Bell Road is not assessed as suitable for development, as determined in the WNP - approved and made by HDC. The site does not have public support.
- The site SA071 – Land South of Bell Road is assessed in the WNP as suitable for development and could accommodate 20 houses. Development of the site had public support in the WNP but the site was not taken forward at the time.
- WPC does not support development of the strategic site SA459 - Land at Kingsfold.
- WPC consider that the need for additional housing in the parish could be, or has been, met from windfall sites to 2036 and on sites identified in the extant WNP.
- Horsham’s increased housing demand could readily be accommodated on strategic sites without disrupting local-level, made, neighbourhood plans.
- Review of The WNP could be of limited scope which may avoid the necessity of Regulation 14 and Regulation 16 submissions.
- WPC will be pleased to discuss options with HDC.

Horsham District Local Plan review

1. Warnham Parish Council (WPC) has considered the draft Local Plan (DLP) 2019 to 2036. WPC's response focuses on issues and policies which could directly affect the local parish environment, WPC and its parishioners. No comment is offered on policies, strategic sites and housing allocations in other parishes.
2. Warnham has a made Neighbourhood Plan (WNP), made on 26 June 2019, i.e. only 8 months ago. It was well received by the Examiner and won a commendation in the 2019 RTP1 Award for Planning Excellence. Of particular relevance to this DLP is the Examiner's comment on site selection: *"The (allocated sites) and other potential housing land has been the subject of careful and critical assessment of a standard not commonly found in the evidence base for neighbourhood plans."* Sites SA070, SA071 and SA459 were not allocated.
3. It is acknowledged in the WNP that in the course of its plan period, to 2031, that it may be necessary to review the plan in the light of revisions to the HDPF. The WNP is the culmination of four and a half years involvement with the community, WPC, planning consultants and HDC. It was a costly process against WPC's limited finances and in terms of many hundreds of hours of volunteer time. With the proverbial ink hardly dry on the WNP it is therefore with some resignation that WPC enters into its review at this early time.
4. Warnham parish has 5000 dwellings built, under construction or planned on its boundaries as a result of the HDPF. Warnham currently experiences the additional traffic burden from the early stages of these developments. To a great extent Warnham is a rural buffer between the developments at Broadbridge Heath and North Horsham, exemplified by Warnham Park Estate's extensive deer park of international repute. Consideration should be given in the DLP to the recognition of Warnham village and conservation area as a local strategic gap to be protected from further development.

Housing numbers

5. WNP provides for the delivery of a minimum of 50 dwellings. In response to the Regulation 14 Submission Consultation HDC stated that ***'the proposed scale of development is appropriate for the village for this plan period.'*** Consideration need only be given in this review therefore to housing that may be needed in the final 5 years to 2036.
6. The DLP allocates an additional 50 dwelling units to Warnham, equal to the number identified in the WNP. No explanation or justification is made to support this allocation. The addition of 50 dwellings over the extra 5 years of the revised plan is disproportionate.
7. The WNP identifies the historic rate of build in the parish, paragraph 2.16: an annual village growth rate of 4.2 units per year over the last 20 years. This rate of growth is carried forward in the WNP to 2031. Accelerating this to 10 units per year to 2036 is

unwarranted and unsupported. It is also disproportionate to the historic growth rate of the village, as illustrated in Figure 1.

Figure 1 - Projected housing growth to 2036



At the time of the WNP preparation it was on the understanding that acceptance of 50 dwellings on the boundary of the conservation area would safeguard the parish from further development to the end of the plan period, 2031, that the parish voted in favour of the WNP. The draft proposal now to double this is likely to be met with strident opposition. The 100% increase is disproportionate to the revised housing numbers in the DLP, and punitive.

8. The HDPF provided for at least 16000 homes to 2031 at an average of 800 homes per year (Policy 15). The DLP has a base figure of 17,370 homes to 2036 at a notional rate of 965 homes per year. To the base figure is added an allocation from other areas, mainly Crawley, under the Government’s specified Duty to Co-operate. It is suggested that the base figure of 965 could be increased to 1000, 1200 or 1400 homes per year. Considering the mid-range of 1200 per year, 21,600 homes would be the target to 2036. The increase from 16000 in 2031 to 21,600 in 2036 would be an increase of 5,600 – 35%. If this percentage increase were to be allocated on a ‘fair share’ pro rata basis to existing plans **Warnham’s additional housing burden would be a total of 17/18**, (35% of 50) in the 5 years to 2036.
9. The DLP (page 94) makes an allocation to most parishes. Nine of these are at the level of 50 units or below, totalling 360 units, only 6.4% of the increase of 5,600. It would appear to be disproportionately disruptive to nine parishes to consider an unwelcome increase in housing allocations when HDC is considering major strategic sites to accommodate the majority of the revised housing needs to 2036. The potentially credible West of Crawley (Kilnwood Vale) site alone is promoted as having potential for 10,000 homes and is well located to absorb the Crawley overflow, and is close to Gatwick and other employment centres. The strategic sites identified in the draft Local Plan are reported to be able to accommodate over

25,000 homes. The potential burden on small parishes proposed in the DLP could readily be avoided by development only at the strategic sites.

Housing Needs Assessment

10. Neighbourhood plans were established in order that local communities could plan housing developments in their areas to meet local housing needs. To this end the WNP undertook a Housing Needs Assessment. This identified that the base allocation to meet Warnham's local needs is about 50 units, to 2031, and this is provided for in the WNP. This assessment was accepted and commended by HDC. It is not unreasonable to assume that there will be a continuing local housing need after 2031 and project this allocation to future years. 50 units from 2019 (the date of the made WNP) to 2031 is 4.2 per year. To extend the local provision an extra 5 years to 2036 would need an extra **21 units**.
11. The DLP, paragraph 6.46, states: *'The Council also recognises that future development should respond appropriately to local character and local needs. Evidence of local needs will normally be in the form of a local housing needs assessment prepared specifically for that parish.'* Such an assessment to 2031 forms part of the WNP and has been fully met.

Recent housing completions in Warnham

12. 2019 saw the completion of two housing developments in Warnham outside the provisions of the WNP. First, 14 dwellings in Caryll Place (the historic church glebe land off Church Street), and secondly, 6 units of affordable housing in Northlands Road. Warnham can therefore show that it has already met the increased housing number of 20 units.

WNP development sites

13. To accommodate the assessed need for 50 dwellings to 2031 the WNP allocated land for development on identified sites – sites to the north of Freeman Road and to the north of Warnham Primary School, Policy W6 on Inset Map 25. An initial scheme prepared by professional planners show that nearly 60 units could be accommodated on the sites while meeting requirements for open space and environmental protections. More detailed planning against a revised allocation could result in the revised expectations being met on the existing site. This would then avoid any additional land allocations in the village as proposed in the DLP.

DLP proposed development sites

14. Two additional sites on the Warnham BUAB for consideration are identified in the DLP: SA070 – Land North of Bell Road and SA071 – Land South of Bell Road. Both were assessed in the WNP but not taken forward.
15. **SA070 – Land North of Bell Road** was eliminated on three key counts. First, it is bounded on the west side by housing on School Hill and on the south side by housing on Bell Road. Many of the School Hill properties are listed. Currently their setting is bounded on the east side by open fields and distant views. Development would substantially change the setting of these listed buildings and would be robustly resisted, as found in public consultation on the WNP. Secondly, the topography of the site is sloping to the north, from Bell Road, and hence housing development on the site would overlook the existing properties. This will also result in justifiable objection. The site has similar characteristics (Listed Buildings and overlooking existing properties) to a site in Tuggles Plat, in the village, that was put forward for development and refused on appeal – ref. APP/Z3825/W/16/3145622. Thirdly, the sloping topography of the site would render any development visually intrusive in the landscape and would be readily visible from Bell Road, Warnham Park, footpath FP1577 and the approved new footpath/cycle path from Bell Road to FP1577 (see WNP Ch.7).
16. **SA071 – Land South of Bell Road**. This site met the criteria for being shortlisted for development in the WNP. It was omitted from further consideration, at the time, as the land owner was reluctant to accept the type of housing required to meet WNP policies on housing size and mix. There was little public opposition to development of the site and it warrants further consideration in review of the WNP. HDC assess the capacity of this site at **20 units**. A smaller number of larger houses on this site together with an additional contribution from the WNP allocated sites could meet a target number of 20 additional units.

Warnham Strategic Site – SA459 Land at Kingsfold

17. Warnham has part of a strategic site in the parish, to the east of Kingsfold village. The site of 177ha spans the Horsham/Dorking railway line which is the parish boundary, and hence the site is partly outside the parish. The site has areas subject to flooding, is undulating and visibly exposed, and is not ideal for development. The proposed development could be 1000 dwellings but spread across five villages. The proposals include an A24 bypass around Kingsfold, relocation of Warnham station as a parkway station, a school, village facilities, affordable housing and a Gypsy and Traveller site. It would also involve the loss of some ancient woodland. It is questionable whether 1000 dwellings would be sufficient to fund the highway works and other infrastructure proposed. The concept of five new disparate villages is not obviously a sustainable concept as it would be heavily car dependent to access schools, shops and essential services. WPC has not assessed this site in detail as it does not meet some of the requirements of the NPPF and the DLP. Development at this site is not supported by WPC.