

**NORTH HORSHAM PARISH COUNCIL  
EXTRAORDINARY PARISH COUNCIL MEETING  
MONDAY 26<sup>th</sup> FEBRUARY 2024 AT 11am**

**CLERK'S REPORT**

**To be read in conjunction with the Agenda**

**1. Public Forum.**

Members of the public are invited to put questions or draw relevant matters to the Council's attention, prior to the commencement of business. This is for a period of up to 15 minutes and shall be limited to 3 minutes per person.

**2. Apologies for Absence.**

Apologies and reasons for absence to be given to the Clerk.

**Decision : To note apologies for absence.**

**3. Declarations of Interest.**

Members are advised to consider the Agenda for the meeting and determine in advance if they may have a **Personal, Disclosable Pecuniary or Other Registrable Interest** in any of the Agenda items. If a Member decides they do have a declarable interest, they are reminded that the interest and the nature of the interest must be declared at the commencement of the consideration of the Agenda item; or when the interest becomes apparent to them. Details of the interest will be minuted.

If the interest is a **Disclosable Pecuniary Interest**, Members are reminded that they must take no part in the discussions of the item at all; or participate in any voting; and must withdraw from the meeting chamber, unless they have received a dispensation.

Where you have an **Other Registrable Interest** (which is not a Disclosable Pecuniary Interest), Members are reminded that they must withdraw from the meeting chamber after making representations or asking questions.

**4. Local Plan Review Regulation 19 Consultation**

At the Council Meeting held 11<sup>th</sup> January 2024 (Min. FC/96/24 refers), Members agreed that a Working Group be formed to consider any response to the Regulation 19 Consultation on the Draft Local Plan for Horsham District.

The new Horsham District Local Plan 2023-2040 will set out planning policies and proposals to guide development in the District, excluding the South Downs National Park, up to 2040. The Plan sets out where new development may be allocated, how much affordable housing may be built and includes policies for considering new development proposals such as infrastructure, community facilities, design and heritage and addressing the causes and potential impacts of climate change.

HDC are now at the stage where they are seeking views on whether the Regulation 19 Plan is legally compliant and meets the tests of 'soundness', as set out in the National Planning Policy Framework (NPPF).

Unlike previous consultations, HDC are asking specific questions which will give respondents an opportunity to comment on how the Local Plan has been prepared, whether its aims are achievable and whether the Regulation 19 Plan is based on a robust evidence base.

All representations from this stage will be submitted with the Regulation 19 Plan for consideration by a Government appointed independent Planning Inspector.

However, a recent email from HDC Strategic Plan stated :-

*We know that the procedure for commenting on the Local Plan can seem complicated. This is to ensure comments are made in the format that is wanted by the Planning Inspector(s) who will, ultimately, decide if the Horsham District Local Plan meets the Government's requirements or not. Officers have therefore used the standard guidance and proformas suggested by the Planning Inspectorate in drawing up the consultation forms and guidance. We accept that there may be sites or other aspects of the plan to which you intend to object, and whilst we may not agree on these matters, the Strategic Planning team is still very happy to assist you with any questions or concerns you may have with the technical procedures around the consultation and how to submit representations.*

An email was sent to Strategic Planning, enquiring how any "other" comments may be submitted with the following response received :-

*I can confirm that we would accept a report/document which covers many areas of the Regulation 19 Local Plan. Should the Parish Council wish to submit their representation in this way, please could a summary of content also be provided.*

The Working Group has held two meetings, on 30<sup>th</sup> January and 12<sup>th</sup> February, and reviewed all parts of the Plan. A summary of their comments is attached as **Appendix 1** which includes their recommendation as follows :-

Following the Working Group meetings, the Members **AGREE** to **RECOMMEND** to Council that the following be submitted to HDC Strategic Planning :-

- a) The entire summary of comments on the Draft Local Plan
- b) On the assumption that the reference to electric scooters is intended to mean 2-wheeled electric scooters and not mobility scooters, Legal Compliance of the Plan is questioned regarding Para 8.8 under the heading Sustainable Transport as reference is made to electric scooters which are not vehicles that may be legally used on public land and there is no approved hire scheme in Horsham District.
- c) The Soundness of the Plan is questioned regarding SP37 and HA10 due to :
  - Ambiguity of naming of sites i.e. Land at Mercers Road/Land at Cuckmere Farm/HOR2
  - Potential for a site name being missed as point 4 of SP37 ends with "and"
  - Ambiguity of the number of additional dwellings to be provided through intensification of the previously outline approved 2,750 dwellings at Mowbray

- The site North of Horsham has already been through a thorough, rigorous and in-depth examination including the Planning Inspectorate and the evidence resulted in a decision that 2,750 was a suitable density for the area
- The inclusion of a new sites at Cuckmere Farm and/or Mercers Road and/or HOR2 is contradictory to the proposed SP15 which intends to avoid the coalescence of settlements

Members will find attached as **Appendix 2** a blank Representation Form as provided by HDC and copies of the completed versions, as based on the recommendations above, will be circulated by email for consideration.

Members are asked to note that if it is agreed to submit all the comments made, together with the completed Representations, these will need to be submitted via email rather than the HDC portal.

**Decision : To receive the recommendations from the Local Plan Review Regulation 19 Consultation Working Group and agree any submissions**

**Local Plan Review Reg 19 Working Group**  
**Meetings held 30<sup>th</sup> January and 13<sup>th</sup> February 2024**

Cllr. Turner elected as Chairman of the Meetings

Members had been circulated a link to the Draft Plan and supporting documentation on the HDC website.

Members made the following comments on each Section of the Draft Plan :-

3.16	Horsham Town	It was felt that the distinct settlement of North Horsham as defined by the Parish Boundary was ignored and simply combined with Horsham Town, despite it being the largest Parish in the District with its own character, requirements and considerations separate from the Town Centre
3.24	Housing	Whilst it is laudable that housing should be "affordable", there is no definition or assessment of what this means to the average person.
3.25	Spatial Objectives - Table 1 (9)	There is a lack of acknowledgment or focus on neighbourhood facilities and services (inc. retail) outside of the Town or larger village centres which contribute to communities and enable a more sustainable and greener society
4.9	Meeting Development Needs	In view of the increased constraints arising from Water Neutrality, support a focus on meeting the District's own unmet needs and not neighbouring Districts'.
4.10	Meeting Development Needs	Strongly supports that development can only be accommodated when it does not place undue pressure on existing infrastructure and/or provides new infrastructure that supports any new development.
4.17	Strategic Sites	With regard to the Land West of Ifield, whilst acknowledging that this is out of NHPC area, concerns remain about the wider impact of this development on infrastructure, including health and transport, in contradiction to 4.10.
4.20	Delivery Timescales and Longer Term Vision	The need to keep the duty to cooperate under review is noted but this raises concerns due to the area being severely water stressed.
4.24	Economic Development	Whilst NHPC has not objected to the plans under the DCO, any expansion will exacerbate an already stretched infrastructure and network.
4.29	Development Hierarchy	Acknowledged that there are a number of health centres and a small hospital in Horsham, there is concern about whether this is sufficient and also its accessibility.

SP2	Development Hierarchy	In Table 3 : Settlement Hierarchy, there is no mention of North Horsham as a distinct settlement in its own right and it is simply tied to the main Town.
SP4	Horsham Town	This policy is too centric and needs to take account and give consideration to the needs of the north of the Town.
5.6	Climate Change	Support early consideration of all matters relating to climate change when development takes place.
SP6	Climate Change (Carbon Reduction)	Fully support point 1e, and the importance of sustainable transport infrastructure and encouragement of walking, cycling etc.
5.17	Appropriate Energy Use	Concern that restrictions on gas boiler installation is effectively in place immediately
5.31	Water Neutrality	Query the inclusion of Arun District in the areas covered by the WRZ ( <i>Confirmed after meeting that a very small area around Bury Hill/North of Arundel falls into the WRZ</i> ).
5.33	Water Neutrality	Laudable ambition for a limit of 85lppd but difficult to achieve and absolutely impossible to monitor. No indication of what the average per person per day usage is and whether the measures as outlined can offset enough of this usual usage to bring the daily use down to the 85l.
SP10	Flooding	There needs to be better management and more robust intervention by water companies together with responsibilities undertaken by those with riparian rights.
SP15	Settlement Coalescence	Support efforts to stop coalescence of communities particularly between North Horsham and Faygate. Also there is a need to avoid any further expansion north and east of the Mowbray site to stop coalescence and further erosions of the gap between the settlements.
SP16	Protected Landscapes	Strongly support the protection of the High Weald AONB and avoidance of the enlargement of the Built Up Area or coalescence together with the protection of important habitats
SP17	Green Infrastructure and Biodiversity	Strongly support all elements of this policy, but highlight point (10) regarding buffer zones around Ancient Woodland as of particular importance.
SP18	Local Green Spaces	Support this policy and would like to ensure it encompasses all green spaces including the small pockets within existing development.
SP20	Development Principles	Support this policy and highlight point (7) regarding trees as particularly important.

Chp. 8	Infrastructure, Transport and Healthy Communities	With regard to health care provision, reinforce concern of lack of A&E especially as Crawley was downgraded some years ago. The comments are noted and endorsed regarding difficulties in accessing health care when relying on public transport.
SP23	Infrastructure Provision	In (1) reference is referred to a “sufficient capacity” but how this is quantified is called into question. Anecdotal evidence suggests that there is currently insufficient health care provision in the area for the existing population. Furthermore, the importance of getting infrastructure in place as the beginning rather than the end of development was highlighted.
8.8	Sustainable Transport	Clarification is required on whether the Electric scooters referred to in this paragraph means electric mobility scooters or two wheeled escooters. If the latter, it is questioned why electrically assisted scooters are included and referred to - without reference to hiring in this paragraph - when they cannot legally be used on roads or pavements. On the assumption that the intention is to refer to 2-wheeled escooters, the Council would therefore <b>question the legal compliance</b> of the Plan when it is making allowances and policies for a mode of transport that is not currently legal on public land and no existing approved hire scheme is in place.
SP24	Sustainable Transport	1(b) reinforces the 20 minute neighbourhood requiring access to shopping facilities and services outside of Horsham Town Centre for those living in North Horsham.  1(d) should refer to a necessity for bus provisions and not be restricted by feasibility.  1(f) refers to e scooter hire when they are no pilot schemes in place in Horsham District and it is not felt that e scooters - which are not legal on public land unless as part of an approved scheme - should be encouraged.
SP25	Parking	In (2) highlight that the parking must be sufficient and designed to prohibit pavement parking
8.32	Inclusive Communities Health and Wellbeing	The difficulties in accessing services, including health care, is not limited to rural but also those in North Horsham and once again highlights the need for local services/retail that can be accessed through walking, cycling etc.
SP27	Inclusive Communities Health and Wellbeing	Support all aspects

SP28	Community Facilities, Leisure and Recreation	Support accessible facilities for all residents
SP30	Enhancing Existing Employment	Under Point (7) support the retention of commercial properties and not permit changes to residential units without compelling argument.
SP35	Strategic Policy - Town centre Hierarchy	Concern that restricting to “Town Centre First” and expecting proposals to be located in the main shopping area adversely impacts neighbourhood shops and the ability to travel in a sustainable manner i.e. walk, cycle and also in specific regard to North Horsham, affects community cohesion.
10.4	Housing	Aware of the need for further housing and the figure of 777 per annum but concerned about how this can be met whilst not exacerbating the existing stress on water, services, infrastructure and facilities.
10.11	Wider Housing Need and the Duty to Co-operate (North West Sussex Crawley)	Agree that HDC can no longer give the same level of co-operation to neighbouring districts
10.24	Housing Provision	Parish accepts that 2,750 has been approved for North of Horsham and that Policy SD1 of the HDPF (Nov 2015) should be carried over for the new Plan period.
10.25	Housing Provision	<p>The 500 Homes referred to - the policies are unclear exactly how these will be met and the issue is further confused by the wording of SP37 (see below)</p> <p>Concerns about the inclusion of Land at Cuckmere Farm site due to flooding, access and the proximity to the boundary of Warnham Parish.</p>
SP37	Housing Provision	<p>4 - The figure of 60 homes is queried and questions where this figure has come from.</p> <p>The statement “<i>..intensification totals 500 dwellings...</i>” is queried. If the intensification of the previously outline approved development of 2,750 dwellings adds 60 homes, where is the balance of 440 dwellings to be delivered from?</p> <p>Is this 500 in addition to the 400 homes in HOR2 at Mercers Road? If so, the Plan is making an allocation for an additional 900 homes North of Horsham - a total which is effectively hidden within the detail of the Plan.</p> <p>If the additional 500 dwellings includes HOR2, it is disingenuous to refer to the intensification totalling 500 as the vast majority is to come from a site outside the previously approved</p>

		<p>boundary for the Mowbray development. At point 10.25, the Plan includes reference to “..a degree of densification . . .” at the previously approved North of Horsham development now known as Mowbray. The application for the approved 2,750 homes for North of Horsham went through a vigorous application process and scrutiny from all interested parties and was thoroughly examined with the involvement of the Planning Inspectorate, with the outcome being that a housing number of 2,750 being considered acceptable for that area.</p> <p>Finally, paragraph 4 appears to be unfinished as it ends with “and” - are there other sites that should be referred to?</p> <p>6 - There is concern that a housing requirement has been calculated but this resulting plan does not adequately address how this need is going to be met.</p> <p>These comments regarding points 4 &amp; 6 of SP37 results in the question of <b>whether the Plan is “Sound”</b> if it is not clear on the numbers and locations of additional dwellings and furthermore, does not demonstrate how the Plan will be able to meet its own targets.</p>
10.38	Affordable Housing	The Council supports the proposals for Affordable Housing but stresses that the District Council needs to adhere to these levels and not allow them to be watered down through the Planning process.
10.44	Affordable Housing	The Council supports the CLTs and in particular the NHCLT and asks that the District and County Council do similarly.
10.58	Retirement Housing and Specialist Care	Supports this as is important to have accessibility to services, shops etc as referred to under SP35
10.79	Housing Allocation	Reiterate the need for sustainable development and good connections, infrastructure and transport links for all sections of society when planning development.
HA10	Horsham	The Council has great concern about the plans for further development North of Horsham, around and within (through increased density of building) the new Mowbray development. The Plan is confusing in its description of sites and numbers of



		<p> dwellings. Is the development referred to as Cuckmere Lane the same as that referred to in HOR2 as Land at Mercer Road?  Consistency is needed so that it is clear and understood exactly what the intentions are for North of Horsham.</p> <p> Members referred back to their comments on SP37 as detailed above namely, is the 500 referred to in SP37 in addition to the 400 homes in HOR2 at Mercers Road under HA10? If so, the Plan is making an allocation for an additional 900 homes North of Horsham - a total which is effectively hidden within the detail of the Plan.</p> <p> If the additional 500 dwellings does include HOR2, it is disingenuous to refer to the intensification totalling 500 as the vast majority is to come from a site outside the previously approved boundary for the Mowbray development.</p> <p> The inclusion of a new sites at Cuckmere Farm and/or Mercers Road appears to be at odds with the intended Policy SP15 - Settlement Coalescence as it would narrow the gap between Horsham and Warnham.</p> <p> The Council therefore is of the opinion that the confusion around the naming of sites, the development at Cuckmere Farm/Mercers Road would be at odds with the intended SP15, the ambiguity about the numbers to be provided by new sites and intensification and the fact that this site has already been through a rigorous planning process <b>questions the Soundness of the Plan</b> in its current form.</p>
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## Horsham District Local Plan 2023-40

### Representation Form Regulation 19 Stage

Ref:

(For official  
use only)

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**Please return to Horsham District Council BY 5:00pm on 01 March 2024**

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#### Privacy Statement – PLEASE READ

All comments are published together with names and (where applicable) organisations; therefore, all comments are publicly available and attributable. Horsham District Council will process your details in relation to the preparation of this documentation only. We will only share personal data in accordance with the Data Protection Act 1998 and the UK General Data Protection Regulations. For further information please see the Council's Privacy Policy and Strategic Planning Privacy Notice:

<https://www.horsham.gov.uk/privacy-policy>

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This form has two parts –

Part A – Representor's details: Need only be completed once. Ensure all emails or postal submissions include one Part A form or include this information in the email/letter.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make, by using the Copy and Paste functions.

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### Part A – Representor's details

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These are the details that will be used for all future correspondence, unless otherwise advised in writing.

Representation  
made on behalf of:

*Only complete this field if you are an agent making representations on behalf of a client. Include at least either the client's name or the organisation (or both).*

*If you are making representations on behalf of yourself or your own organisation, please state 'N/A'.*

*[Please overwrite text in italics]*

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

Address + postcode

Telephone Number

E-mail Address

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## Part A (continued)

### Further contact

**Please note that by completing and submitting this questionnaire, you are consenting to being kept informed of further formal stages of the Horsham District Local Plan, including all matters relating to the Local Plan Examination following submission. Please ensure you have read and understood the Privacy Statement above.**

**If you do not consent to this, you will waive your opportunity to be directly invited to participate in the Local Plan Examination, and you will need to rely on yourself checking the Local Plan website ([horsham.gov.uk/localplan](https://horsham.gov.uk/localplan)) should you wish to be involved further.**

**If you do not consent to being kept informed of further formal stages, please mark the box:**

## Part B – Please use a separate sheet for each representation

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Name and (where relevant) organisation (to match Part A):

1. To which part of the Local Plan or submission documents does this representation relate?

Please mark the appropriate box

Paragraph  
e.g. '4.35'

Policy  
e.g.  
'Policy 21'

Policies Map

Sustainability  
Appraisal

Habitats  
Regulations  
Assessment

2. Do you consider the Local Plan is:

2.1 Legally compliant

Yes

No

2.2 Sound

Yes

No

2.3 Complies with the Duty to co-operate

Yes

No

3. Please give details of why you consider the Local Plan is not legally compliant or is not sound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet /expand box if necessary. Please provide a summary of any attachments, such as supplementary evidence, submitted alongside your representation.)

4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 3 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary. Please provide a summary of any attachments, such as supplementary evidence, submitted alongside your representation)

**Please note:** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

**Please note:** *While this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate.*

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*