

Horsham District Local Plan Regulation 18 – Report on Initial Consultation Outcomes

A total of around 6,340 comments were received on the Local Plan consultation from approximately 3,350 individuals and organisations. It should be noted the final figure may be adjusted slightly as a small number of duplicate comments have been found (i.e. the same comment submitted online and via email or hardcopy).

The vast majority of comments were submitted online (around 5,500), with the remainder relatively evenly split between letters and emails.

All comments received have now been subject to a high level review by Officers (referred to as ‘Tagging’). This process allows the each comment to be electronically classified (or tagged) against the part of the plan to which the comment related, and whether it was a support, object or general observation. Each comment can contain multiple tags – for instance if someone objected to one site, but supported another, the comment was registered against both these sites. The process also enabled reasons for the support or objection to a particular site to be noted.

The analysis in this note sets out the results of the high level tagging process which provides a clear indication of the key issues that have been raised in response to the consultation.

Policy 14 – Housing Provision

The main area of comment was on Policy 14 – Housing Provision.

The draft policy has three elements to it which are discussed in turn:

1. Strategic Sites
2. Smaller Sites
3. Housing Target

1.Strategic Sites

Where comments were made on strategic sites, it was first identified as to whether the comment was a support / object or general (‘observation’) comment. In addition, where reasons were given for an objection or support, these were assigned to particular categories as follows:

- Development and Housing (e.g. type, size, cost of housing and the ability of developers to deliver housing)
- Sustainable growth (e.g. relationship of a site to existing settlements or the settlement hierarchy)
- Economy (e.g. the type and amount of jobs likely to be provided, the impact on existing businesses)
- Environment (e.g. impact on natural and historic environment)
- Flooding (e.g. existing flooding conditions on site or impact of development on flooding)
- Climate change (e.g. relationship with development and climate change)
- Infrastructure (e.g. impact of development on roads, schools, medical services, etc.)

The table below shows a breakdown of the amount of objections, supportive comments or general observations on each strategic site. For each site, the reasons why people have commented are

shown. As it was common for multiple reasons to be given to form a particular view, the sum total of the reasons will exceed the overall amount of comments on each site. The overall figure is shown below in bold.

Table 1 – Comments received on Strategic Sites

Site	Object	Support	Observation
Land at Adversane (Kingswood)	359 <i>Development and Housing – 71</i> <i>Sustainable Growth – 85</i> <i>Economy – 138</i> <i>Environment – 240</i> <i>Flooding – 37</i> <i>Climate Change – 46</i> <i>Infrastructure – 286</i>	42 <i>Dev and Housing – 9</i> <i>Sustainable Growth – 6</i> <i>Economy – 7</i> <i>Environment – 18</i> <i>Flooding – 6</i> <i>Climate Change – 0</i> <i>Infrastructure - 19</i>	27 <i>Dev and Housing – 3</i> <i>Sustainable Growth – 1</i> <i>Economy – 4</i> <i>Environment – 5</i> <i>Flooding – 1</i> <i>Climate Change – 1</i> <i>Infrastructure - 13</i>
E of Billingshurst (Little Daux)	278 <i>Development and Housing – 44</i> <i>Sustainable Growth – 51</i> <i>Economy – 40</i> <i>Environment – 165</i> <i>Flooding – 114</i> <i>Climate Change – 24</i> <i>Infrastructure – 221</i>	34 <i>Dev and Housing – 7</i> <i>Sustainable Growth – 7</i> <i>Economy – 4</i> <i>Environment – 7</i> <i>Flooding – 1</i> <i>Climate Change – 0</i> <i>Infrastructure - 21</i>	23 <i>Dev and Housing – 0</i> <i>Sustainable Growth – 2</i> <i>Economy – 3</i> <i>Environment – 5</i> <i>Flooding – 2</i> <i>Climate Change – 1</i> <i>Infrastructure - 9</i>
W of Billingshurst (Newbridge Park)	243 <i>Development and Housing – 41</i> <i>Sustainable Growth – 66</i> <i>Economy – 30</i> <i>Environment – 147</i> <i>Flooding – 111</i> <i>Climate Change – 23</i> <i>Infrastructure – 185</i>	15 <i>Dev and Housing – 2</i> <i>Sustainable Growth – 2</i> <i>Economy – 3</i> <i>Environment – 4</i> <i>Flooding – 2</i> <i>Climate Change – 1</i> <i>Infrastructure - 9</i>	26 <i>Dev and Housing – 2</i> <i>Sustainable Growth – 1</i> <i>Economy – 4</i> <i>Environment – 5</i> <i>Flooding – 3</i> <i>Climate Change – 1</i> <i>Infrastructure - 12</i>
Buck Barn (Weald Cross)	356 <i>Development and Housing – 66</i> <i>Sustainable Growth – 72</i> <i>Economy – 71</i> <i>Environment – 277</i> <i>Flooding – 78</i> <i>Climate Change – 40</i> <i>Infrastructure - 307</i>	20 <i>Dev and Housing – 9</i> <i>Sustainable Growth – 5</i> <i>Economy – 4</i> <i>Environment – 9</i> <i>Flooding – 2</i> <i>Climate Change – 4</i> <i>Infrastructure - 13</i>	16 <i>Dev and Housing – 5</i> <i>Sustainable Growth – 2</i> <i>Economy – 3</i> <i>Environment – 1</i> <i>Flooding – 3</i> <i>Climate Change – 1</i> <i>Infrastructure - 6</i>
West of Crawley	159 <i>Development and Housing – 30</i> <i>Sustainable Growth – 20</i> <i>Economy – 14</i> <i>Environment – 123</i> <i>Flooding – 55</i> <i>Climate Change – 16</i> <i>Infrastructure - 91</i>	50 <i>Dev and Housing – 17</i> <i>Sustainable Growth – 14</i> <i>Economy – 20</i> <i>Environment – 8</i> <i>Flooding – 5</i> <i>Climate Change – 4</i> <i>Infrastructure - 27</i>	45 <i>Dev and Housing – 15</i> <i>Sustainable Growth – 3</i> <i>Economy – 3</i> <i>Environment – 14</i> <i>Flooding – 5</i> <i>Climate Change – 0</i> <i>Infrastructure - 19</i>
Kingsfold (North West Horsham)	57 <i>Development and Housing – 8</i> <i>Sustainable Growth – 15</i> <i>Economy – 9</i> <i>Environment – 30</i> <i>Flooding – 11</i> <i>Climate Change – 2</i> <i>Infrastructure - 35</i>	13 <i>Dev and Housing – 5</i> <i>Sustainable Growth – 2</i> <i>Economy – 3</i> <i>Environment – 1</i> <i>Flooding – 3</i> <i>Climate Change – 1</i> <i>Infrastructure - 6</i>	13 <i>Dev and Housing – 4</i> <i>Sustainable Growth – 1</i> <i>Economy – 1</i> <i>Environment – 3</i> <i>Flooding – 1</i> <i>Climate Change – 1</i> <i>Infrastructure - 9</i>

Site	Object	Support	Observation
N E of Henfield (Mayfield)	1,669 <i>Development and Housing – 325</i> <i>Sustainable Growth – 475</i> <i>Economy – 433</i> <i>Environment – 1272</i> <i>Flooding – 1127</i> <i>Climate Change – 270</i> <i>Infrastructure – 1437</i>	36 <i>Dev and Housing – 16</i> <i>Sustainable Growth – 14</i> <i>Economy – 8</i> <i>Environment – 19</i> <i>Flooding – 17</i> <i>Climate Change – 4</i> <i>Infrastructure - 27</i>	39 <i>Dev and Housing – 6</i> <i>Sustainable Growth – 3</i> <i>Economy – 1</i> <i>Environment – 11</i> <i>Flooding – 10</i> <i>Climate Change – 1</i> <i>Infrastructure - 23</i>
Rookwood	474 <i>Development and Housing – 77</i> <i>Sustainable Growth – 17</i> <i>Economy – 21</i> <i>Environment – 429</i> <i>Flooding – 138</i> <i>Climate Change – 39</i> <i>Infrastructure - 257</i>	29 <i>Dev and Housing – 10</i> <i>Sustainable Growth – 7</i> <i>Economy – 9</i> <i>Environment – 12</i> <i>Flooding – 7</i> <i>Climate Change – 6</i> <i>Infrastructure - 20</i>	31 <i>Dev and Housing – 5</i> <i>Sustainable Growth – 1</i> <i>Economy – 1</i> <i>Environment – 14</i> <i>Flooding – 6</i> <i>Climate Change – 1</i> <i>Infrastructure - 9</i>
W of Southwater	61 <i>Development and Housing – 19</i> <i>Sustainable Growth – 8</i> <i>Economy – 8</i> <i>Environment – 36</i> <i>Flooding – 2</i> <i>Climate Change – 4</i> <i>Infrastructure - 40</i>	21 <i>Dev and Housing – 4</i> <i>Sustainable Growth – 6</i> <i>Economy – 2</i> <i>Environment – 4</i> <i>Flooding – 0</i> <i>Climate Change – 0</i> <i>Infrastructure - 10</i>	12 <i>Dev and Housing – 1</i> <i>Sustainable Growth – 0</i> <i>Economy – 0</i> <i>Environment – 3</i> <i>Flooding – 0</i> <i>Climate Change – 0</i> <i>Infrastructure - 8</i>

* Numbers correct as of 30th April – figures may change slightly as further analysis is undertaken

From the above, it can be seen that it can be seen that most comments received on sites were objections and that Land North East of Henfield (Mayfield) received the most comments in total. Except for Land West of Crawley and Rookwood, infrastructure issues were the most commonly cited reasons for an objection. These relate to comments about existing infrastructure problems (e.g. traffic congestion, lack of health infrastructure, etc.) and/or that not enough infrastructure would be delivered by the potential site allocation to support both new and existing communities.

A small number of supportive comments were submitted. In some instances, the support was contingent on the delivery of aspects of a particular proposal – e.g. infrastructure that would benefit both existing and new residents.

2.Smaller Sites

A large number of smaller sites were identified in both the Local Plan consultation document and the supporting documentation. Owing to the number of sites, the number of comments that have been received have been logged on a settlement by settlement basis in the first instance to understand the level of interest in different settlements.

The reasons for comments in each different settlement were generally for the following different reasons:

- Objection (or support / observation) to the potential smaller scale housing requirement (both too high and too low)
- Objection (or support / observation) to inclusion of one of the sites with potential for allocation in Table 1
- Objection to non-inclusion of a particular SHELAA site in a specified settlement.

Table 2 below gives an indication of interest in each settlement. As can be seen, the largest amount of objections related to Ashington, where a clear expression from the community against new development occurring at a rate greater than that outlined in the draft Neighbourhood Plan was made.

Around 94 supportive comments were made relating to the Horsham Golf and Fitness site, mostly from self-identified members of Horsham Hockey Club who are supportive of development and specifically the delivery of hockey facilities on the site.

It should be noted that this data is high level and does not show more nuanced information at this time. For example, some respondents supported some sites but objected to others in the same settlement – as such a ‘support’ and ‘object’ would be noted in both columns in the table below.

Table 2 – Comments made on small scale site proposals

Site	Object	Support	Observation
Ashington	197	12	16
Barns Green	7	3	0
Billingshurst	39	5	7
Broadbridge Heath	7	2	1
Christ’s Hospital	11	0	1
Cowfold	16	2	5
Henfield	42	30	8
Horsham (Forest)	69	2	5
Lower Beeding	5	2	2
Mannings Heath	6	0	1
North Horsham	10	2	10
Partridge Green	37	4	3
Pulborough/Codmore Hill	14	3	4
Rudgwick/Bucks Green	7	12	7
Rusper	13	1	5
Slinford	7	1	3
Small Dole	26	1	4
Southwater	17	4	4
Steyning & Bramber	11	9	5
Storrington & Sullington	72	3	8
Thakeham	59	4	5
Upper Beeding	6	0	2
Warnham	10	0	2
West Chiltington	37	4	2

* Numbers correct as of 30th April – figures may change slightly as further analysis is undertaken

3. Housing Target

The Horsham District Local Plan Regulation 18 consultation document identified three potential housing targets – 1,000, 1,200 and 1,400 homes per year. The table below shows the number of comments made in relation to each target, in terms of support, object or as a general observation as well as the number of comments made on housing numbers more general ‘overall’.

Table 3 – Comments on housing numbers

Housing Number	Object	Support	Observation
Overall	279	132	64
1,000 per year	56	55	12
1,200 per year	58	25	11
1,400 per year	62	53	13

* Numbers correct as of 30th April – figures may change slightly as further analysis is undertaken

In general terms comments received from the public generally felt that the housing target was too high whereas developers had a preference for the higher housing targets. In addition there was a general feeling among members of the public that HDC should not help meet the needs of other authorities (particularly Crawley) and that development in the district was already too high. The development industry consistently offered an opposing view.

Other policies/sections of the plan

The other policies didn't generate the same level of comment, with very few representations commenting on the precise wording of policies. A more common example was a comment indicating general concerns with a particular issue. In such a situation a comment would be allocated to a related policy. For example, comments on flooding would be allocated to Policy 40 (if a comment was received about concerns with flooding on a particular site then this would have been tagged as an objection, due to flooding, against that site).

A breakdown of the number of comments received on each policy area is given in Table 4 below

Table 4: Comments on other plan areas

Policy/Plan Area	Object	Support	Observation
Glossary	6	0	1
Spatial Vision and Objectives	204	72	70
Planning Context	93	17	38
Introduction	9	5	5
1 (Sustainable Development)	29	11	9
2 (Development Hierarchy and Settlement Expansion)	175	48	29
3 (Settlement Expansion)	63	21	22
4 (Horsham Town)	11	6	15
5 (Broadbridge Heath Quadrant)	10	8	13
6 (Economic Growth)	58	12	52
7 (Employment Development)	23	13	21
8 (Rural Economic Development)	21	11	12
9 (Agricultural and Rural Conversions to Other Uses)	25	8	9
10 (Equestrian Development)	2	3	8
11 (Tourism Facilities and Visitor Accommodation)	17	10	8
12 (Retail Hierarchy and Sequential Approach)	13	11	33
13 (Town Centres Uses)	12	6	15
15 (Strategic Site Development Principles)	24	20	38
16 (Affordable Housing)	36	21	38
17 (Meeting Local Housing Needs)	31	9	36
18 (Improving Housing Standards in the District)	10	9	11
19 (Exception Housing Schemes)	7	2	1

20 (Retirement Housing and Specialist Care)	12	22	11
21 (Rural Workers' Accommodation)	2	4	0
22 (Replacement Dwellings/House Extensions in Countryside)	2	1	3
23 (Ancillary Accommodation)	1	2	2
24 (Gypsy and Traveller Accommodation)	13	17	10
25 (Environmental Protection)	20	17	34
26 (Air Quality)	31	12	26
27 (The Natural Environment and Landscape Character)	19	15	16
28 (Countryside Protection)	24	14	19
29 (Settlement Coalescence)	26	31	28
30 (Protected Landscapes)	17	12	8
31 (Green Infrastructure and Biodiversity)	44	18	44
32 (Local Greenspace)	11	18	9
33 (Development Quality)	12	16	13
34 (Development Principles)	10	14	14
35 (Managing Change within the Historic Environment)	9	15	10
36 (Shop Fronts and Advertisements)	2	11	3
37 (Climate Change)	29	26	56
38 (Appropriate Energy Use)	9	8	16
39 (Sustainable Design and Construction)	15	12	24
40 (Flooding)	37	10	28
41 (Infrastructure Provision)	98	23	75
42 (Sustainable Transport)	84	18	95
43 (Parking)	17	8	15
44 (Gatwick Airport Safeguarded Land)	6	9	5
45 (Inclusive Communities, Health and Wellbeing)	7	9	13
46 (Community Facilities, Leisure and Recreation)	18	16	30

* Numbers correct as of 30th April – figures may change slightly as further analysis is undertaken

In addition to the above there were also 345 comments on different documents in the evidence base. These are variable in their nature and content, depending on the evidence base document.

In addition, there were at least 189 comments relating to the consultation itself. There were two common responses.

1. The online system was difficult to use
2. The consultation should have been cancelled/extended due to the lockdown.

It should be noted that these comments are a very low proportion of the total, and most complaints about the online system were made via the portal. The Council has been clear throughout the consultation that written and email comments would be accepted and has already set out the reasons for not extending the consultation – which in summary were that the main consultation events had been completed prior to lockdown; the Council put in place measures to ensure that all representations were received; and that staff remained available in office hours to deal with any questions or queries about the consultation.

Next Steps

Due to the very high volume of comments received on the consultation it is important to highlight that this report sets out at a very high level only the type and nature of the comments that have been

received. Many of the documents that have been submitted to the Council are highly detailed in nature. It is important that these are subject to more detailed analysis to fully inform the next steps of plan preparation, but this is by its nature a more time consuming process than the initial classification and general identification of issues.

It is important to note that the further work that is progressed will be derived from the specific planning issues that have been raised during the consultation rather than the number of comments or the level of objection or support for a particular site or housing target. For example - if further work is necessary to understand the impact of noise on a particular location, this work would be undertaken regardless of whether 1, 20 or 400 comments have been received in relation to this matter.

In general terms the additional work that is necessary to progress to the Regulation 19 stage of plan preparation is as follows:

- 1) Updates to the evidence base documentation together with any additional studies which are identified as necessary
- 2) Review and update of site assessment in light of further evidence received during the consultation
- 3) Review and updates to draft policies as appropriate.
- 4) Drafting of a Consultation Statement – this will set out a more detailed outcome of the issues raised during this consultation, and how the comments have been taken into account.

Publication of Comments

Officers have to review each comment to ensure that there are no data protection issues that would arise should the comment be published (this could be information about the respondent's health or pictures of their children included in photographs). If required such information will be removed from the published version. Due to the volume of comments received and the scrutiny required this process has taken some time. It is therefore envisaged that comments will start to be published from early June onwards. This will be a rolling process, as the moderation process is completed but it is considered that it is important to start making comments available as soon as is practicable. Given the level of interest in comments from statutory bodies, site promoters and other key organisations it is envisaged that most of these comments will be published first.