



HORSHAM DISTRICT LOCAL PLAN – REGULATION 19

ROADBRIDGE HEATH PARISH COUNCIL CONSULTATION RESPONSE

Submitted by email to localplan@horsham.gov.uk: 1st March 2024

In responding to the new draft Local Plan (the Plan), Broadbridge Heath Parish Council would like to point out that the land area within the Parish Boundary, and particularly the Built-up Area Boundary (BUAB) of Broadbridge Heath, is in effect full and therefore very few options exist for any new development.

One area within the BUAB and the subject of a specific Local Plan Strategic Policy (SP5), the “Broadbridge Heath Opportunity Area” (or “Broadbridge Heath Quadrant”), has previously been identified as an area for development and the subject of at least one recent specific planning application covering a significant part of the site.

The Parish Council recognises that this area is likely to be developed either in part, or in the longer term, in its entirety.

We seek as a priority that any development taking place in this location must strictly meet the planning criteria and conditions as set out in the draft Plan.

We have seen through the recent developments within the parish that planning conditions can (will) be watered down or relaxed as the development progresses and we believe it essential that compliance with the Policy requirements be strictly controlled by Horsham District Council (HDC) within their remit of development compliance, within their role as the Local Planning Authority.

In dealing with the BUAB, we see the most contentious aspect of proposed development in the Plan at Broadbridge Heath being the land proposed for housing at Lower Broadbridge Farm, shown as BRH1, within Strategic Policy HA7.

This land has already been the subject of a Planning Application, refused by HDC and subsequently the subject of appeal by the applicant. We are concerned that this land has been allocated within the Plan, when the Local Planning Authority did not see it as meeting the requirements for such development. Although the number of houses proposed via the draft Plan at this location is somewhat less (than the planning application), the principle of development at this location has not materially changed. The most obvious aspect being it is over-development, on a green field site, outside of the BUAB and outside of the parish boundary of Broadbridge Heath, this location falling within the parish of Slinfold.

There is at best little incentive for the Parish Council to support development at this location, with it being outside of the village BUAB and outside of the parish boundary.

However, should such housing development be approved under the Local Plan it is essential that the Parish boundary be changed to include this area of land. This would enable any benefits derived from housing development, such as that from Community Infrastructure Levy (CIL) and subsequently householder Council Tax, to flow to Broadbridge Heath which would be taking (suffering) the disbenefits of development at the same time.

On a general but highly important point, the Policies as laid out in the Draft Local Plan, for any, and all, development taking place MUST wholly conform to the Plan Policies and be strictly controlled by the Local Planning Authority to ensure conformance and compliance through to building completion and occupation.

In relation to the Local Plan (and Developers) meeting the Water Neutrality requirements, the Parish Council is sceptical that this has been adequately addressed to ensure appropriate mitigation against increased water usage. We are concerned that although there may be mitigations demonstrated on paper, in practice they will not yield the necessary savings and efficiencies on water usage.

For example, any potential developers and housebuilding firms don't appear to be required to do more than install aerated taps, showers and water reducing valves etc. We ask why they are not being asked, through the Local Plan, to build houses with grey water recycling systems and rainwater collection capability which will help to reduce the demand, the volume of water draining into the sewers and minimising the risk of any overflow water being dumped into the local rivers and sea. We understand that the costs are estimated to be around £4,000 per house for such capabilities, but these technologies will enable a lower use of water on a permanent long-term basis.

As regards the use of aerated taps, showers, flow reducing valves etc. to offset the increased demand for water due to house building, it was not made clear in the Plan whether each year's total saving from retrofitting was counted only in the year of installation, or as a cumulative total, bearing in mind that there is nothing stopping householders from removing them, thereby nullifying quoted savings.

The Plan, as currently drafted, covers much ground and many aspects of development for the period up to 2040 and includes many aspects of positive intent via the numerous policies as set out.

We urge all involved in the Plan's preparation, finalization, approval, and delivery to do all possible to ensure that all subsequently approved development meets the aspirations and standards as set out in the Plan.

Local communities need and deserve the protection and standards that a Local Plan should and can provide and we ask that all efforts are made by all parties to achieve this.
