

THAKEHAM PARISH COUNCIL response to Horsham District Council Reg 18 Local Plan consultation

Chapter 1: Intro	No comment
Chapter 2: Planning Context	No comment
Chapter 3: Spatial Vision and Objectives	
<p>General Comment: Council's general feedback is that although this section sets out an appropriate general vision (with certain omissions), the supporting policies of the Plan currently fail to set out mechanisms and safeguards that are geared to actually deliver key elements of this vision.</p>	
Para/Policy Topic	
Economy	<p>The vision states that the strategy will provide jobs that “offer the opportunity of working closer to home.” In respect of Thakeham, the Plan fails to do this.</p> <p>Objective 1 should explicitly reference the need for economic growth and regeneration to be predominantly low carbon based.</p>
Housing	<p>The vision states that housing will be delivered “that is supported by community facilities and services.” However, the Plan provides no evidence that the further growth proposed for central Thakeham will be supported by the delivery of appropriate facilities and services.</p> <p>Objective 10 should reference the need for development to make a meaningful contribution towards the UK legal requirement to be net zero carbon by 2050, and delivering the supply of renewable, low carbon and decentralised energy.</p>
Environmental Quality and Climate Change	<p>The vision states that “Development will be adaptable to the impact of climate change and will mitigate these effects.” In meeting current legal obligations under the Paris Agreement 2015, development must do more than ‘mitigate’ the effects of climate change; it must <i>reduce</i> the contribution that development makes to climate change. To remedy this, the vision should state that by 2036 Horsham District will have made a meaningful contribution towards the target of net zero greenhouse gas emissions by 2050. As growth of housing, employment, travel and other activities will create further greenhouse gas emissions, even with the most effective carbon minimisation strategy, the Plan must then set out how the emissions from this low carbon approach will not only be minimised but <u>offset by positive action</u>. Failing this, Council considers that both the draft vision and Plan that supports it are in conflict with current legal duties under the Paris Agreement.</p> <p>This section also underplays the importance, in the context of climate change, of water conservation and recycling, and protecting the riparian assets of the district.</p>
Transport Infrastructure	<p>The vision states that “<i>Opportunities for non-car based transport including walking, cycling and community transport services will be prioritised to help reduce the reliance on private vehicles</i>” and that “<i>The transport infrastructure, especially public transport, is continually improved to offer a high quality, reliable and frequent service and communication facilities are developed to support a sustainable, resilient economy, including opportunities for people to live close to where they work.</i>” The strategy for growth as it affects Thakeham provides no support for improvements to public transport (see <i>Policy 42 Infrastructure</i>) and the lack of jobs proposed by the strategy mean that local residents cannot live closer to where they work. This lack of sustainable movement is acknowledged by the Interim SA.</p> <p>In particular, both this section and the supporting Plan notably avoid mention of scheduled bus services, which remain the best option for many types of journeys, particularly for residents of rural settlements to visit towns and hub villages for work, college, shopping and socialising. Community Transport schemes can play a part in this but regular scheduled bus services remain critical for linking the main hubs and connecting rural settlements. The current level of these services has been reduced this area of the district (Thakeham, Shipley, Barns Green) to the point of effective non-existence. Whilst scheduled bus provision is a WSCC responsibility, it is vital that HDC and its planning processes robustly represent the interests of its rural communities in a way that <u>ensures delivery</u> of required improvements. <i>These areas cannot take more housing without decent public transport connections.</i></p> <p>The lack of a current objective relating to transport is a clear omission. Council suggests the following wording for such an objective:</p>

'Minimise the need to travel by private car through the delivery of meaningful improvements to public transport networks, particularly buses, by focusing housing and employment growth in close proximity to one another and by delivering high quality dedicated walking and cycling routes.'

Chapter 4: Policies for Growth and Change

4.8: Strategic Policy 2 – Development Hierarchy

Medium Villages

Thakeham Parish Council strongly objects to the proposed re-classification of Thakeham in the HDC Settlement Hierarchy (LP Policy 2), from a 'small' to a 'medium' village

This proposal will have serious future planning implications for the Thakeham community. Paragraph 16c of the NPPF states: *"Plans should be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees"*

There has been no engagement with Thakeham Parish Council regarding a change to the hierarchy status of the central Thakeham settlement area, prior to this plan presenting it as a *fait accompli* proposal.

As a minimum, such a proposal requires supporting quantitative/qualitative evidence-base that compares the current infrastructure and connections of settlements to the described characteristics for 'small' and 'medium' villages. When such an analysis is carried out (Appendix 1) it shows that **there is no evidence base for central Thakeham outgrowing the 'small village' category**. The key factors are:

- a) *Size and scope for housing growth:* even when the current main development at Abingworth is complete, the population of central Thakeham will remain in line with other 'small' villages, and well below the norm for 'medium' villages; and as the SHELAA and the site assessment plans in this consultation demonstrate that there is no scope for further substantial housing in the immediate area;
- b) *Lack of public transport connections:* central Thakeham has effectively no scheduled bus service. Residents cannot make a return bus journey to Storrington on *any day*, and can only reach Horsham via one very early morning and one late afternoon service on weekdays. Residents are therefore currently dependent on private vehicles for all travel for work, shopping and socialising. While there are moves to improve local community transport options, there is no prospect of that kind of small-scale initiative fully replacing the missing connections to Storrington, Horsham and other hubs.
- c) *Lack of shopping facilities:* the planned shop at Abingworth Meadows has yet to open and establish itself. Although a very welcome addition to local facilities it remains a relatively small convenience store – *no larger than most other 'small villages' in Horsham district already have*. Moreover, there are no plans or clear opportunities for new supporting retail developments in central Thakeham and in any case such development would not gel with draft Policy 13 (Town Centre Uses), as there is no 'defined village centre' in central Thakeham around which further retail units would naturally accrete.

Therefore there is no foreseeable prospect of central Thakeham ceasing to meet the description of a 'small village' in terms of having 'limited services and facilities', and residents being very much 'reliant on larger settlements to access most of their requirements.'

Likewise, central Thakeham does not meet the descriptive criteria of a 'medium' village as it does not have a 'moderate level of services' which can provide in any meaningful way for the 'day-to-day needs of residents'.

The evidence base (Appendix 1) in fact shows that there are several other small villages in Horsham District with a better case to become 'medium villages' before Thakeham. Our analysis of 'medium villages' also shows that, if Thakeham were to be moved to this category, it would be an anomalously small outlier, in terms of population, quality and size of facilities, and transport connections.

THAKEHAM PARISH COUNCIL response to Horsham District Council Reg 18 Local Plan consultation

We are also unclear as to why central Thakeham is parenthesised as '(The Street and High Bar Lane)', which ignores the large Abingworth development. A more succinct description is '(Abingworth area)'.	
4.9 Strategic Policy 3 – Settlement Expansion	
Material omission: the 5 proposed criteria for supporting settlement expansion do not mention, as they should, the issue of not impinging on green gaps between rural settlements, and avoiding settlement coalescence .	
Policy 4: Horsham	Council submits that there is an opportunity in Horsham town redevelopments for increased density mitigated by modern attractive design. The style around the new Piries Place development could be extended to the whole of the area around the Drill Hall and its car park. This would reduce the demand for rural greenfield sites. This urban setting is particularly suitable for addressing current housing stock deficits that the Plan correctly identifies in relation to starter-homes for young families, homes for single people, and the elderly. Unlike outlying parishes Horsham has good transport links. It is vital that the Plan delivers the right kinds of homes at the right locations, driven by the age profile of the population.
Policy 5: Broadbridge Heath Quadrant	No comment
Chapter 5 – Economic Development	
Policy 6: Economic growth	No comment.
Policy 7: Economic Devt.	No comment.
8 Rural Economic Development	<p>Strong objection. While the new policy is clearer, Council has two serious concerns regarding the penultimate paragraph:</p> <p>a) the requirement to demonstrate absence of adverse impact applies only to the 'wider area'. This gives undesirable scope for applicants to argue that immediate negative impacts in the immediate site area are merely 'local' and do not really impinge on the 'wider area' (which is left undefined). The phrase 'wider area' should be replaced with '..of the location', or just 'area'.</p> <p>b) the statement 'Measures that will enhance biodiversity.. will be supported' makes such measures an <i>optional extra</i>, and weakens the previous policy that proposals 'must result in substantial environmental improvement'.</p> <p>We therefore suggest that this paragraph should read:</p> <p><i>"Any proposal must demonstrate that it will not adversely affect the character, appearance or visual amenities and the intrinsic character and beauty of the countryside and the location in question, and must seek to enhance biodiversity in and around the site."</i></p> <p>Without these amendments, and as it stands, this policy will directly and seriously undermine Policy 28 Countryside Protection.</p>
9 Conversion of Agricultural/Rural Buildings	<p>Strong Objection: without proposed amendments, and as it stands, this policy will directly and seriously undermine Policy 28 Countryside Protection.</p> <p>Council is very concerned about both the general aims and specific phrasing of this new policy. To the extent that it will facilitate the conversion of agricultural buildings in isolated countryside settings to general open-market housing and commercial uses inappropriate to locations, we consider the policy to be fundamentally misguided. It runs directly counter to existing Thakeham Neighbourhood Plan Policy 9 (Development in the Countryside), which aims to resist '<i>sporadic development by preventing conversion of isolated buildings or farm buildings of no merit</i>' and to '<i>ensure that houses suitable for agricultural or forestry workers will not continue to be lost from the local housing stock by their extension into general open market dwellings.</i>'</p> <p>Council fundamentally disagrees with facilitating the presence of more open market housing and businesses at isolated locations in the countryside. This</p>

THAKEHAM PARISH COUNCIL response to Horsham District Council Reg 18 Local Plan consultation

	<p>policy's aim (which is evidently to facilitate this, subject to some moderation of visual change and ensuring access) misses the fundamental point that adding more people, activity and vehicles in isolated rural locations has negative environmental impacts that simply cannot be adequately mitigated or balanced by other benefits.</p> <p>To the extent that it relates to residential development this policy is also unnecessary and has considerable potential to cause confusion. There is an existing regular stream of agricultural conversion applications under class Q prior approval regulations. The adoption of this new policy will leave applicants, statutory consultees and the local planning process unclear which application route to follow, and which criteria apply.</p> <p>Therefore Council seeks the removal of all reference to residential units from this policy. In addition, we believe that the new policy text needs a number of improvements, i.e. conversions of buildings outside BUABs should:</p> <ul style="list-style-type: none"> • Be for the purpose of commercial or community developments of a type that is appropriate to a countryside location; • Clause 2 needs the addition of a reference to avoid substantial demolition as well as 'reconstruction'; • Clause 5 relies on a series of aesthetic judgements relating to design quality and 'enhancement' that are likely to be vulnerable to appeals vs refusal. It needs greater specificity, including provision that proposals should not result in a significant increase in the existing building footprint or height; • Clause 6 suffers from exactly the same weaknesses that affect Policy 8, and should be tightened thus: <i>"Any proposal must demonstrate that it will not adversely affect the character, appearance or visual amenities and the intrinsic character and beauty of the countryside and the location in question, and must seek to enhance biodiversity in and around the site."</i>
10 Equestrian Development	No comment.
11 Tourism Facilities	Council feels strongly that this policy needs the addition of caveats against the conversion of existing non-residential buildings in isolated rural locations to create additional visitor accommodation. This is for the same reasons as Council strongly objects to proposed new policy 9, i.e. adding more people, activity and vehicles in isolated rural locations has negative environmental impacts that simply cannot be adequately mitigated or balanced by other benefits.
12 Retail Hierarchy and Town Centre First Principles	Council supports this policy, including its Retail Centre Hierarchy, and 'Town Centre First' approach. However, we would point out that successful implementation of this policy in the medium-long term depends significantly on improving public transport links to enable residents of rural settlements to access the designated retail centres without complete dependence on private vehicles. The high level of housing allocations that this Plan signals are likely to be needed in rural areas implies that, unless something is done to improve public and non-motorised travel options, thousands of additional private cars will converge on primary and secondary retail centres, e.g. Storrington, adding to existing heavy traffic and worsening already significant air quality problems. Therefore HDC needs to support rural communities in terms of: <ul style="list-style-type: none"> a) safeguarding and restoring access to adequate public transport (mainly rural bus services); and b) supporting the enhancement of non-motorised access routes, especially all-weather safe cycle routes.
13 Town Centre Uses	Council supports this policy, but points out that an implication of the focus of this policy on directing new retail to 'defined village centres' is that central Thakeham, having no such defined centre, is extremely unlikely to develop as a 'medium village', as suggested by Policy 2 Settlement Hierarchy.

Chapter 6: Housing - Policy 14 Housing Provision

Strong Objection.

1. General

Council feels strongly that Horsham District should not be required to accept a new housing target that is above the 1000 homes/year required to meet local housing needs. Indeed, this figure should be substantially *lower*. We dispute the accuracy and evidence-base for central government algorithms and economic/demographic assumptions that have produced the 1000/year figure, before one even considers the higher figures arising from 'duty to cooperate' pressures.

These projections are driven mainly by speculative projections regarding population growth that it is assumed will result from booming continuous economic growth attracting thousands of new residents into this area. This flies in the face of current evidence and other stated policies of this Government. Evidentially, it is not supported by any mainstream post-Brexit economic/demographic forecasts, and it is already clear that the national economic impact of the current Covid-19 crisis will be serious and long-term.

But even if these assumptions were credible, Council rejects the policy view that housing growth of this order, which will effectively destroy the rural character of this district, is the acceptable price of economic growth. In any case, the assumption of major ongoing migration into rural south-east counties runs completely counter to the Government's stated commitment to levelling-up the prosperity of the north of England vs. the south-east.

This district can cope, without changing its character, with the organic need for new housing geared to the needs of the existing district population, and a realistically modest projection of inward migration. It is part of the role of Horsham District Council, along with local MPs, to resist the destruction of our rural heritage and this Local Plan consultation process should be a watershed that leads to a constructive plan to change current central government assumptions and policies, which are demonstrably wrong.

If the District is forced to meet the higher levels of target mentioned, arising from Duty-to-Cooperate pressures, the resulting need to use a very high proportion of viable sites will effectively override and make redundant in most Wards and Parishes, the extremely costly and time-consuming neighbourhood planning process – in direct conflict with stated government policy and the current National Planning Policy Framework. This will badly damage trust and constructive local engagement with the planning process in this area for many years.

2. Smaller Site Options

Do you agree that smaller scale sites will also be needed to meet the Council's housing requirements?

Council agrees that some smaller scale sites will be required, but emphasises that the cumulative impact of many such schemes relatively close together, will require careful control in order to comply the UK's legal requirements to actively reduce carbon emissions. The Plan does not currently address this requirement adequately.

Will the approach of allocating land for over 50 homes in the Local Plan help to provide certainty of delivery, particularly in the short to medium term? Should there be a different threshold?

The Plan presents no evidence base for judging whether the specific threshold of 50 dwellings provides 'certainty of delivery'. The starting point should not be to identify an arbitrary number threshold, but to approach planning small sites from the viewpoint of the capacity of existing infrastructure to support growth in a sustainable manner. New development – especially when broken up across many small sites - cannot be required to remedy existing infrastructure deficiencies, therefore new development should not be allocated to locations until and unless those existing deficiencies have been addressed.

3. Thakeham shortlisted site proposals

3.1 General

Council strongly objects to the indicative Plan allocation that central Thakeham (Abingworth area) should take an extra 50 houses at two sites, additional to our existing Neighbourhood Plan development site

THAKEHAM PARISH COUNCIL response to Horsham District Council Reg 18 Local Plan consultation

commitments and the actual numbers of houses which HDC have agreed can be built on these. The two new sites proposed are: SA039 North of High Bar Lane and SA513 South of Furze Common Road.

This proposal will have serious future planning implications for the Thakeham community. Paragraph 16c of the NPPF states: *“Plans should be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”*

There has been no engagement with this Parish Council regarding these further new house numbers being imposed on the central Thakeham settlement area, prior to the current, effectively *fait accompli* proposals.

The Parish’s case for resisting this is principally that the revised Local Plan needs to take into account the disproportionate volume of new housing that Thakeham is already in the process of absorbing, *including significant ‘creep’ of increased house numbers within sites designated in our Neighbourhood Plan.*

Site	New homes	Other comment
Abingworth Nurseries (assuming HDC approve the 75-unit plan for Phase 3, as officers are recommending).	208	vs 146 original consent featured in our current Neighbourhood Plan, i.e. a cumulative increase of 62 (12 extra in phases 1+2; 50 extra in phase 3) – equating to 42% total numbers ‘creep’.
Meadowbrook, Water Lane	75	
Thakeham Tiles, Rock Road	90	40 more than the ‘approximately 50’ envisaged in our current Neighbourhood Plan
Other recent windfall consents	<u>27</u>	
	400	

Absorbing 400 extra houses in the period 2017 to ~2023 (guesstimating the eventual timing of Thakeham Tiles) represents a **cumulative increase in Thakeham households of nearly 50% on our 2016 baseline. No other comparable parish in Horsham District has been subject to this level of proportionate housing growth.**

Moreover, the new community facilities that these developments have brought will only bring central Thakeham up to the existing district norm for a ‘small village’. **The scope for further housing growth and capacity of facilities in this area is therefore extremely limited.**

The detailed site assessments for SA039/SA513 also quite wrongly state that *‘the area has a reasonable bus service linking the village to Storrington, Pulborough and Horsham as well as Chichester via Pulborough and Arundel’*. As a check on the actual timetables of Compass Buses services [71](#) and [74/A](#) will confirm, is in fact impossible to make a return bus journey from central Thakeham to any of these places on most week-days. Still less is it feasible to commute to work or tertiary education by public transport.

Furthermore, and in relation to the sustainability of the consulted proposals:

- i. There is no evidence presented to suggest how public transport services will be improved in order to create credible and sustainable alternatives to using the private car;
- ii. There is no evidence of assessment of the capacity of the nearest primary school (Thakeham Primary, 2.25km distant) to cope with the additional cumulative demands of additional housing in the parish that is already consented but still in train (around 200 units), plus the additional 50 houses now proposed;
- iii. There are no primary healthcare facilities serving central Thakeham and it is unclear how the already over-subscribed facilities of the nearest ‘hub’ settlement of Storrington can cope with an additional ~550 Thakeham residents (i.e. those still to be delivered via consented schemes, plus numbers in this plan).

3.2 Specific comments on currently shortlisted sites

In strongly objecting to the allocation of any further new housing in central Thakeham at this point (given the disproportionate contribution that Thakeham has recently made in this regard) Council recognises the need to identify least-worst further potential housing sites for future iterations of our Neighbourhood Plan, and have carefully considered the site assessment information relating to the two sites suggested as priorities for development.

Council welcomes the 'Not Currently Developable' assessments of a number of parish sites, especially SA469 (Snapes Corner), SA499 (Land to the rear of Fairlands), SA384 (Land N of Rock Road), SA720 (Land north of Merrywood Lane) and SA335 (Town House Farm).

In relation to the sites currently indicated in the HDC Local Plan (SA039 North of High Bar Lane and SA513 South of Furze Common Road), we have reviewed the new assessments provided in the draft Local Plan *Appendix C SA matrices for small site options* as well as the assessments of these sites that were conducted relatively recently for our current Neighbourhood Plan (made in 2017). This has thrown up a number of material planning concerns about the suitability of both sites for adoption.

Site SA039 scored relatively weakly in the TNP 2017 site assessment, and the reasons for that remain valid: it is grade 2 agricultural land situated in a way that shares only a short boundary with the existing BUAB while projecting northwards into the relatively narrow green gap between the High Bar Lane area of central Thakeham and West Chiltington. Development at this site therefore clearly involves a move towards coalescence of these rural settlements, contrary to Strategic Policy 29. This is something that Council feels strongly that the draft Local Plan assessment relating to *SA objective 7: Landscapes and townscapes* should have noted and scored negatively, and that the assessment is flawed and unsound in this regard. In addition, as the latest *SA matrix for small site options* notes, this site is located within an SSSI IRZ, and carries a risk assessment of significant negative effect on biodiversity and geodiversity. For these reasons, Council does not agree with the way that this site has been scored in this draft Local Plan, and has serious concerns regarding the adoption of this site in any future Neighbourhood plan.

Site SA513 (Land South of Furze Common Road) scores slightly better in terms of infilling an existing indentation in the BUAB without material coalescence impact. However, it too is grade 2 agricultural land, and is part of the same SSSI IRZ. As *SA objective 10: Mineral resources* notes, this site is wholly within a Mineral Safeguarding Area and development here will sterilise that option. A further material consideration with this site is that vehicle access seems problematic. The promoter's suggested access via the Champions Cottages access lane seems extremely constrained, width-wise, by the combination of house boundaries to the north, and on the south side a ditch carrying considerable water flow and a line of TPO-protected trees. Scope for two-lane access is doubtful. In any case it does not appear possible to create a safe junction to the B2139 for the flow of vehicles from 20+ houses at this point, given the road features (including bus stop opposite) and scope for visibility splays.

The potential for alternative access via Furze Common Road has not been promoted. Even if this was shown as feasible, it would require bringing that private road, which is in poor condition, up to WSCC-adoptable standard.

Council also needs to flag again that it is entirely inadequate and misleading for *SA objective 10: Transport* to suggest that the fact that both these sites are within 450m of a bus stop implies that there is access to a functional bus service, when the reality is that central Thakeham has effectively no scheduled bus service. Relevant service timetables are: [71](#); [74/A](#). The assessment is demonstrably flawed and unsound in this regard

Therefore development at both of these sites is highly questionable in terms of impacts and sustainability – and neither is considered suitable for Neighbourhood Plan adoption. However, if any other small sites emerge during or after this consultation period, which score as potentially developable under the HDC site assessment method, then Council remains open to giving such sites further consideration.

3.3. Impact on Thakeham of site proposals in adjacent parishes

3.3.1 Strategic site at Adversane

Council strongly objects to the potential strategic site SA597 at Adversane, on the basis of:

a) General over-development and significant change to the rural character of the area; and

THAKEHAM PARISH COUNCIL response to Horsham District Council Reg 18 Local Plan consultation

b) The traffic impact that is implied by the proposed 2000+ homes and significant business and other new infrastructure, which the poor road network the south-east through Thakeham does not have capacity for. Contrary to the suggestion that most traffic will use the A29, the reality would be significant cross-country flows south and east towards the A24. There is no recognition of this issue in the outline proposal, and experience shows that any general highways funding the development may yield will not be adequate or prioritised to address the local impact.

If any significant development occurs at this location the opportunity must be taken to create a new rail station.

3.3.2 Ashington

Having liaised closely with Ashington Parish Council, we are satisfied that the sites and specific configuration of housing envisaged in their draft Neighbourhood Plan will not create undue settlement coalescence issues, or impact on landscape views between Thakeham and Ashington. Therefore Council wishes to flag its strong support for Ashington PC in objecting to several of the sites identified as developable in this consultation, especially the sites that project further westward from the Ashington BUAB than the housing limits envisaged in the draft Ashington Neighbourhood Plan. In particular:

- SA548 (other than the limited part of this site that is part of the current plan for 225 houses), which would have a very serious impact on the character and views of the landscape between our settlements; and
- SA524, which would bring housing far too close to Warminghurst Church (Grade 1 listed) and create traffic pressures that the single-track Rectory Lane cannot bear.

15 Strategic Site Development Principles	<p>General support. Specific queries/suggestions:</p> <p>In relation to the environmental performance aspects of new strategic developments, rather than the odd reference to specifics such as combined heat and power, and minimising private vehicle use, it would seem useful for this Policy to explicitly cross-reference the important expectations of Chapters:</p> <ul style="list-style-type: none"> - 9 (Climate Change and Flooding), and its policies 37-40; - 10 (Infrastructure, Transport and Healthy Communities), especially Policy 42 Sustainable Transport. <p>With regard to the latter aspect, where the proposed development lies further from a designated retain centre than is reasonable accessible on foot, then potential developers should expect to provide funding for subsidised scheduled and/or community bus services, to enable car-free access to the nearest designated retail and onward commuting hub for at least 10 years.</p> <p>Clause 4 (Re. housing types) - this would seem a good point to reference the expectations of policy 18 (Improving Housing Standards).</p>
16 Affordable Housing	<p>Strong support. Regarding the implementation questions, Council considers that:</p> <ul style="list-style-type: none"> - subject to viability evidence, the target for providing affordable housing should be increased to 40%. - the lower size threshold for the provision of affordable housing should be developments of 8 units overall.
17 Meeting Local Housing needs (Housing Mix)	<p>Strong support, particularly for the identification of the need to significantly increase supply of smaller 1- and 2-bed units, suitable for single people, young families and the elderly. Although the exact mode of delivery will be developer-led, it is often the case that the best way to deliver such units at constrained price-points is via well-designed low-rise blocks of flats.</p>
18 Improving Housing Standards	<p>Strong support. Particularly for the adoption of <i>Optional Standards for Accessible and Adaptable dwellings</i> (which effectively subsumes the Lifetime Homes standard of flexible house design).</p>
19 Exceptions Housing Schemes	<p>Support. (<i>This allows for affordable-only schemes at sites not viable for open-market development.</i>)</p>
20 Retirement Housing and Specialist Care	<p>Support</p>

THAKEHAM PARISH COUNCIL response to Horsham District Council Reg 18 Local Plan consultation

21 Rural Worker Accommodation	Support
22 Replacement Dwellings in the Countryside	Support
23 Ancillary Accommodation	Cautious support. This new policy seeks to address growing demand (evident in several recent Thakeham proposals) from families wishing to enable a close relative – usually elderly – to live in a separate annexe within the curtilage of the main property. The new policy would permit this, subject to demonstrated need and the annexe being subsidiary in size and relationship to the main house, to which it would remain ancillary. Usual neighbour considerations would apply. Such cases outside the BUAB will of course mean more people living in the countryside, which is in tension with the current TNP, but this seems a minor and reasonable adjustment.
24 Gypsy & Traveller sites	<p><i>This policy sets out updated site needs assessment and emphasises the aim to provide sufficient G&T pitches mainly via strategic sites, but also allowing the option for small/single sites, subject to essentially unchanged criteria. This policy probably cannot be written any more restrictively than it is, while remaining compliant with relevant NPPF policies. The issue in practice is more about how the policy is interpreted in specific cases, and in the light of the current inadequacy of HDC site supply. For the purpose of our response propose...</i></p> <p>Strong endorsement of the policy aim to require strategic housing developments to include G&T sites, and for this approach, combined with regularisation of some existing informal sites, to provide the large majority of pitches required.</p>
Chapter 7: Conserving and Enhancing the Natural Environment	
25 – Environmental Protection	Support (<i>Revised policy strengthens/clarifies need to avoid creating light pollution and noise disturbance.</i>)
26 – Air Quality	Support. <i>This new policy highlights the criticality of air quality and how that links to sustainable transport modes, cleaner/electric vehicles, and commits to ensure that the cumulative impact of all relevant developments is assessed.</i>
27 Natural Environment and Landscape Character	Support. <i>This policy is mainly unchanged, but is strengthened by inclusion of commitment to SUDS (sustainable drainage systems).</i>
28 Countryside Protection	General Support. <i>This policy is mainly unchanged, but slightly strengthened in terms of 'integration within the landscape'.</i> However, Council submits that the welcome commitment of this policy to resist 'significant increase in the overall level of activity in the countryside' will be directly undermined by the proposed weakening of Policy 8 Rural Economic Development, and the new permissive Policy 9 Conversion of Agricultural/Rural Buildings.
29 Settlement Coalescence	
a) Future Green Belt designation option	No comment. <i>This just notes that HDC has the option, in relation to new strategic developments, to combine consent with new surrounding Green Belt designations.</i>
b) Policy 29 itself	Support. <i>This policy is essentially unchanged. What matters is implementation!</i>
30 Protected Landscapes	No comment. <i>This relates to designated protected landscapes and is unchanged.</i>
31 Green Infrastructure & Biodiversity	Support. <i>Improved version of current policy. Commits developments to min. 10% net gain of biodiversity (directly, or via offset to Nature Recovery Network).</i>
32 Local Green Spaces	Strongly Support. <i>This is a new policy which seeks to integrate with designation of Green Spaces within Neighbourhood Plans, and imposes strong planning protection for such designated spaces. This is relevant e.g. to the Glebe Field.</i>
Chapter 8: Development Quality, Design and Heritage	
33 Development Quality	Generally support, but propose caveat. <i>This is a somewhat strengthened policy that is mainly ok, but clause 4, which relates to 'making efficient use of land', would benefit from a caveat to the effect that lower densities are justified where the impacts of maximal resident numbers would otherwise be unacceptable.</i>
34 Development Principles	Generally support, but propose minor amendment. <i>This policy has been improved in several ways, but clause 9, which relates to ensuring that buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, is currently weak and could be strengthened by being made a strong presumption.</i>

THAKEHAM PARISH COUNCIL response to Horsham District Council Reg 18 Local Plan consultation

35 Heritage Assets and Managing Change in the Historic Environment	Significant Objection: although improved in some ways, the new policy has dropped the important previous commitment to: <i>Retain and improve the setting of heritage assets, including views, public rights of way, trees and landscape features.</i> Protection of the <i>setting</i> of heritage assets remains vital. This includes Conservation Areas such as The Street in Thakeham.
36 Shop Fronts and Adverts	No comment
Chapter 9: Climate Change	
37 Climate Change	<p>Although moving in the right direction, serious concerns remain that this policy is currently not robust enough.</p> <p>Council considers that this policy needs further strengthening to deliver the significant reductions in carbon emissions, vs. the 2019 baseline, required by Paris Accord legal commitments. The policy should:</p> <ul style="list-style-type: none"> a) have wider scope than residential; <i>all</i> forms of development should be expected to contribute towards carbon reduction, and if that is difficult to require for some use classes, alternative offsetting mechanisms are needed; b) be more specific about what is expected in order to address land use matters where reductions in carbon emissions will have most effect, e.g. transport; c) use more directive and measurable language: it is not adequate to be merely “supportive of a range of measures...” to reduce carbon emissions; <p>Council also flags that as long as the shortlisted site allocations in Chapter 6 are based on flawed and unsound assessments of public transport links, the Plan’s spatial strategy is in conflict with this policy’s reference the need for ‘.. good accessibility to public transport...’ Likewise, this clause should be rephrased:</p> <p>4. Using patterns of development which reduce the need to travel, encourage walking and cycling and are supported by excellent public transport services as well as good accessibility to those public transport networks</p>
38 Appropriate Energy Use	Strongly Support.
39 Sustainable Design and Construction	Support. <i>Seems a good policy but we can flag that Clause (f) would be a good point to reference the <i>Optional Standards for Accessible and Adaptable dwellings and/or Lifetime Homes</i> standard of flexible house design.</i>
40 Flooding	No comment. <i>(Seems ok; not qualified to critique.)</i>
Chapter 10: Infrastructure, Transport and Healthy Communities	
41 Infrastructure Provision	<p>Serious concerns:</p> <ul style="list-style-type: none"> a) that the approach proposed in para 10.4, which defers key infrastructure elements of the plan making process to the planning application stage, is unsound, because a detailed understanding of the capacity of existing infrastructure to support growth should be present in the Local Plan’s <i>Infrastructure Delivery Plan</i>; and b) that the evidence-base for this policy in the Infrastructure Delivery Plan (IDP) 2020 is inadequate and flawed. <p>Weaknesses identified in the IDP as it relates to Thakeham include:</p> <ul style="list-style-type: none"> i. Transport – the assessment of Bus Service current provision shows no consultation with Parish Councils; it grossly understates the impact of recent cuts to subsidised scheduled bus services through the large rural arc of Thakeham, Shipley and Barns Green. The radical lack of services in this area is dismissed under the throwaway phrase: ‘the rest of the District has less frequent services’. <p>The IDP’s list of future transport improvement priorities do not include any items that would benefit central Thakeham or its northern parish neighbours.</p> <p>Otherwise, the IDP’s identification of forward transport improvement opportunities for central Thakeham are limited to some bridleway and footpath links that the Parish Council has not been consulted on and do not address the key need for a</p>

THAKEHAM PARISH COUNCIL response to Horsham District Council Reg 18 Local Plan consultation

	<p>project to provide an all-weather walking/cycling link to the nearest hub village, Storrington.</p> <p>ii. Education – the number of places for children by age are presented but under ‘Location’ it states that this is ‘on- or off-site subject to spatial strategy of Local Plan’. The Local Plan gives no understanding as to how or whether such needs can be accommodated at locations accessible to central Thakeham residents.</p> <p>iii. Health – contributions towards site-specific improvements yet there are no primary healthcare facilities in Thakeham. The nearest GP surgeries are in Storrington, which is not accessible by public transport (no weekday return service).</p> <p>Council therefore considers the evidence underpinning the whole spatial strategy to be inadequate with regard to infrastructure provision.</p>
42 Sustainable Transport.	<p>This policy requires considerable further strengthening.</p> <p>The passive language of this policy, to merely ‘encourage and support’ proposals which promote an improved and integrated transport network is inadequate. The strategic transport policy for the district must be more specific and pro-active.</p> <p>What changes would you suggest? Council proposes that the wording of this policy should be amended as follows:</p>
<p><i>‘In order to reduce carbon emissions and ensure development is sustainable, there is a need to develop an integrated community connected by a sustainable transport system. In order to maximise regular use of sustainable modes of travel and movement, development proposals must improve the quality and integration of the transport network, specifically through a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities.</i></p> <p><i>Development must:</i></p> <ol style="list-style-type: none"> <i>1. Provide safe and suitable access for all vehicles, pedestrians, cyclists, horse riders, public transport and the delivery of goods.</i> <i>2. Minimise the distance people need to travel and minimises conflicts between traffic, cyclists and pedestrians.</i> <i>3. Prioritise and provide safe and accessible walking and cycling routes and be integrated with the wider network of routes, including public rights of way and cycle paths.</i> <i>4. Deliver better local bus and rail services in partnership with operators and increase opportunities for interchange between the public transport network and all other modes of transport. The following specific routes are a priority for improvement: [List specific priority routes]</i> <i>5. Develop innovative and adaptable approaches to public transport in the rural areas of the District. The following specific schemes should be provided as a priority: [List specific priority schemes]</i> <i>6. Maintain and improve the existing transport system (pedestrian, cycle, rail and road).</i> <i>7. Be accompanied by an agreed Green Travel Plan where it is necessary to minimise a potentially significant impact of the development of the wider area, or as a result of needing to address an existing local traffic problem.’</i> <p>Where a major proposed development lies further from a designated retain centre than is reasonably accessible on foot, then prospective developer should be expected to provide funding for low-carbon subsidised scheduled and/or community bus services, to enable car-free access to the nearest designated retail and onward commuting hub for at least 10 years.</p>	
43 Parking	This policy would benefit from clarifying the <i>level</i> of expected provision of vehicle charging facilities (currently unclear whether it means some, all,)
44 Gatwick Airport Land	No comment
45 Inclusive Communities, Health and Wellbeing	Support. <i>Seems a good policy; strengthened by ref. to community facilities.</i>
46 Community Facilities and Uses	Support. <i>Much strengthened policy which now sets specific minimum standards of space for various types of community space, including allotments, youth etc.</i>

Appendix 1: Analysis of ‘Smaller’ vs ‘Medium’ Villages in Horsham District Council settlement hierarchy (characteristics of settlements in these categories)

Smaller Villages: Villages with limited services, facilities, social networks but with good accessibility to larger settlements (e.g. road or rail) or settlements with some employment but limited services facilities or accessibility. Residents are reliant on larger settlements to access most of their requirements.

Settlements currently in this group (HDPF 2015)	Current population ¹	WSCC schools		GP Practice	Convenience store	Other Retail	Pub/ Eating venue	Public Transport		Community Facilities	Recreation Facilities	Facility Score (Red=0; Amber=1; Green=2)
		2ndary	Primary					Bus Svc	Train			
Christs Hospital	1300											10
Lower Beeding	1000											12
Mannings Heath	1100											8
Rusper	650											13
Small Dole	770											9
Thakeham (central)	1100											10
Average: 990 ; Median: 1050												10.3

Key to RAG colour coding

More than 2km from village centre	>4km	None	None	None within 2km	None	None	None	None	None
	2-4km	1 small	limited	1 venue within 2km	V Limited – no weekday commuting	Station but car transport essential	Limited	Limited	
Within 2km of village centre	<2 km	Large/several	A range	2+ venues	Adequate for weekday shop/commute	Station with good access	Adequate	Adequate	

Medium Villages: these settlements have a moderate level of services and facilities and community networks, together with some access to public transport. These settlements provide some day to day needs for residents, but rely on small market towns and larger settlements to meet a number of their requirements.

Settlements in this group in the 2020 LP consultation	Current population	WSCC schools		GP Practice	Convenience store	Other Retail	Pub/ Eating venue	Public Transport		Community Facilities	Recreation Facilities	Facility Score (Red=0; Amber=1; Green=2)
		2ndary	Primary					Bus Svc	Train			
Ashington	2700											16
Barns Green	1150											13
Cowfold	1300											17
Rudgwick	2050											17
Slinfold	1100											13
Warnham	1250											15
West Chiltington	3500											14
Average: 1860 ; Median: 1300												15.25

Conclusions regarding the proposal to re-categorise Thakeham as a ‘Medium Village’

- There is no evidence base for Thakeham outgrowing the ‘small village’ category, where it sits mid-table in terms of both population and facilities. Particularly critical negative factors are: a) no scope (as shown by SHELAA) for further substantial housing; b) a barely-existent bus service (which seems unlikely to improve) and c) lack of shopping: the planned small store has yet to prove viable, and there are no plans/clear opportunities for other supporting retail. Therefore there is no prospect of Thakeham residents ceasing to remain reliant on larger settlements to access most of their requirements. There are several other small villages with a better evidence-base to be ‘medium villages’.
- The analysis of Medium Villages shows that, if Thakeham were to be added to this category, it would sit as a clear ‘outlier’ in terms of size and quality of facilities/connections.

¹ Source: https://www.citypopulation.de/en/uk/southeastengland/west_sussex/, with minor rounding; ‘Thakeham’ is defined to mean just the central (Abingworth/The Street) area.