

THAKEHAM PARISH COUNCIL

Strong Objections to HDC Local Plan Regulation 19 proposals, July 2021

Executive summary

Thakeham Parish Council has strong objections to the HDC Local Plan Reg 19 proposals that appeared on 9 July 2021. While there has been insufficient time to consider every element in this 450-page document, the PC's headline objections are:

A. Proposal to re-designate Thakeham as a 'medium village' in the settlement hierarchy

This proposal is based on materially misleading and inaccurate statements. The PC can show, via evidence-based analysis (Appendix 1) signally lacking in the Plan, that the population and facilities of central Thakeham are typical of existing 'small villages' in the District and do not approach the numbers or 'moderate level of services' implied by this re-classification. These facilities will not be changed by the further 140 units allocated in this plan. All main services (retail, health and education) will remain located in the hub village of Storrington, which central Thakeham residents cannot even access by public transport. Central Thakeham will therefore continue to meet the description of a 'small village' in terms of having '*limited services and facilities*', with its residents '*reliant on larger settlements to access most of their requirements*', while at the same time being forced to accommodate a much higher population.

B. Housing Allocations

This Plan now proposes the addition of 140 additional houses within the Thakeham parish boundary, via two sites on High Bar Lane (65 units combined), and 75 units at a site on Rock Road. This involves a gain of 90 units over the Reg 16 2020 LP consultation. This further 140-unit allocation will come on top of Thakeham already gaining ~400 new consents since 2017 – a cumulative increase of nearly 50% on our housing 2016 baseline, and the largest proportionate housing growth of any comparable parish in the district. Adding a further 140 units will increase that proportionate growth to an eye-watering 67%.

This process has not delivered facilities gains that would make this level of housing growth sustainable.

In relation to specific sites, the addition of 75 units at site SA384 Land N of Rock Road (STO2) is particularly egregious. The 2020 Regulation 18 Site Assessment Report deemed this site to be 'not developable', as it '*is separated from the built form of Storrington by mature trees which limits the relationship of the site with the existing settlement and would give rise to a development which appears unrelated to the existing settlement form.*' No good reasons have been presented for changing the 2020 assessment of this site.

C. Sustainability issues and impact for the area, include:

- i. No credible plan improve public transport services to enable viable alternatives to private car use;*
- ii. No credible prospect that capacities of local primary and secondary schools will be able to cope;*
- iii. No credible prospect of Storrington's over-subscribed primary health care facilities being able to cope.*

D. Impact on the future of local planning in Horsham District

This Plan will render the neighbourhood planning process for this district redundant. A context in which neighbourhood plans evidently stand to be swept aside from year to year, at the dictate of distantly-set and unconvincing central government housing growth targets, provides no incentive for any Parish Council to invest resources and local public credibility in the neighbourhood planning process. The result will be a strongly and chronically oppositional relationship between parishes and the local authority in future.

Thakeham Parish Council objections – further detail

A. Proposal to re-designate Thakeham as a 'medium village' in the settlement hierarchy

This proposal is likely to have serious future planning implications for the Thakeham community, yet has emerged with no consultation, in breach of paragraph 16c of the NPPF (re. '*early, proportionate and effective engagement*'). It has re-appeared in this Reg. 19 draft, despite our response to the 2020 Reg. 16 draft having clearly shown that Thakeham does not currently meet HDC's own stated criteria for a 'medium village', nor any prospect of meeting those criteria through the further housing growth now proposed. Thakeham continues to conform entirely to HDC's descriptive criteria for a 'small village'.

The whole justification for this re-categorisation is this statement: *Thakeham village has recently expanded following the growth at the former Abingworth nursery site. This has delivered an expanded range of services and facilities leading to a proposed classification of the settlement as medium village the Council's settlement hierarchy. It has a moderate level of service and facilities including a primary school, public house and convenience store. There are a range of sports pitches including a Cricket Pavilion. The village has a good variety of clubs and societies for all interests and ages. It is assessed as being able to accommodate some growth relative to its status in the hierarchy.*

This statement is materially misleading and inaccurate. Perhaps most glaringly the primary school mentioned is at Rock Road, 2.4km away from the settlement of 'Thakeham Village', which this plan defines – for the purpose of housing allocations – as *restricted to the area of The Street and High Bar Lane*. Meanwhile the other facilities mentioned do not equate to a 'moderate level of service'; they are entirely typical of the facilities found in the existing group of 'small villages', and represent a level of facilities well below the norm for 'medium villages', as is shown by Appendix 1. HDC officers have presented no quantitative/qualitative evidence-base for this proposal that compares infrastructure and connections of settlements to the stated characteristics for 'small' and 'medium' villages. Appendix 1 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 allowing for completion of the current large Abingworth development and addition of the two further sites (65 units) in central Thakeham allocated by this LP, the population of central Thakeham will remain within the range of other 'small' villages, and well below the mean size of 'medium' villages;
- b) *Lack of shopping facilities*: the only shop in central Thakeham is Meadow Stores, a small convenience store-cum-café located in the Abingworth development. Although a welcome recent addition, this only adds a facility that *most other 'small villages' in Horsham district already have*. There are no plans or obvious opportunities for further supporting retail developments in central Thakeham. Such development would in any case not gel with draft HDPF Policy 13 (Town Centre Uses), as there is no 'defined village centre' in central Thakeham around which further retail units would naturally accrete.
- c) *Lack of public transport*: Central Thakeham has no functional scheduled bus service. Residents cannot make a return bus journey to the local hub village of Storrington on *any day*, and overwhelmingly depend on private vehicles for travel to work, shopping, socialising and further education. While the PC is seeking to improve local community transport options, this cannot meaningfully compensate for the existing deficiencies, and the Travel Strategy section of the Reg 19 LP offers no prospect of this situation changing in the near term.

Latest proposals to add 140 more houses within the Thakeham PC boundary (65 in central Thakeham) involve no further material facilities gain. Hence, central Thakeham will continue to meet the description of a 'small village' in terms of having '*limited services and facilities*', and residents being '*reliant on larger settlements to access most of their requirements*.' By the same token, central Thakeham clearly does not meet the criteria for a 'medium' village as it will continue to lack a '*moderate level of services*' that can provide for the '*day-to-day needs of residents*'. Therefore this proposed change is indefensible.

Adding further housing numbers in central Thakeham in this context is in breach of the NPPF (para 11a) precept to 'align growth and infrastructure'. The lack of a properly evidence-based approach to the issue of assigning settlements within the hierarchy categories amounts, in our view, to maladministration.

B. Housing Allocations

This Reg.19 LP now proposes the addition of 140 additional houses within the Thakeham parish boundary, via two sites on High Bar Lane (65 units combined), and 75 units at a site on Rock Road. **This involves a gain of 75 units over the Reg 16 2020 LP consultation.**

At the level of aggregate numbers, these 140 units will be additional to existing consented growth of ~400 extra houses within Thakeham PC since 2017. This already represents a cumulative increase of nearly 50% on our 2016 baseline, which is the largest proportionate housing growth of any comparable parish in the district. Adding a further 140 units will increase that proportionate growth to an eye-watering 67%.

This process has not delivered gains in community facilities that come even close to making this level of housing growth sustainable, or to compensate for the major environmental, landscape and quality-of-life impacts of this scale of development. The facilities gains delivered by existing consents have only brought central Thakeham facilities up to the norm for a 'small village', mainly by renewing the village hall and adding a first small convenience store. The additional 140 units now proposed will not deliver any further material facilities, and is in breach of NPPF (para 11a) precept to 'align growth and infrastructure'.

In relation to specific sites, we are amazed and dismayed at the addition of 75 units at site SA384 Land N of Rock Road (STO2). The 2020 Regulation 18 Site Assessment Report deemed this site to be 'not developable', for good reasons relating to the loss of a large (3.25 ha) agricultural green field, the adjacency of a Grade II Listed Building and generally because the site '*is separated from the built form of Storrington by mature trees which limits the relationship of the site with the existing settlement and would give rise to a development which appears unrelated to the existing settlement form.*' The new Reg 19 LP presents no good reasons for changing the 2020 assessment of this site.

Meanwhile site SA039 (TH1) Land North of High Bar Lane scored weakly in the Thakeham Neighbourhood Plan site assessment process and is already subject to a planning application that the PC has strongly objected to, on grounds including the fact that it shares only a short boundary with the existing BUAB while projecting northwards into the narrow green gap between central Thakeham and West Chiltington, and is therefore a move towards coalescence of these rural settlements, contrary to HDPF Strategic Policy 29.

C. Sustainability issues and impact for the area

Broader sustainability-based objections to these proposals include:

- iv. No credible plan improve public transport services to enable viable alternatives to private car use;
- v. No credible evidence that the capacities of local primary and secondary schools can/will be increased to cope with the additional cumulative demands of additional housing contained in this plan;
- vi. No credible evidence that already over-subscribed primary health care facilities in the 'hub' settlement of Storrington can cope with existing consented housing growth already in train, plus the proposed additional growth in this plan in Thakeham, West Chiltington, Ashington, Washington and Storrington itself.

This general local scenario is in breach of the NPPF (para 11a) precept to 'align growth and infrastructure'.

D. Impact on the future of local planning in Horsham District

In its current shape and detail, this Reg. 19 LP will render redundant the existing neighbourhood plans of Thakeham and most parishes in the district, wasting huge collective effort over recent years. Unless the remaining stages of this Local Plan process are significantly more responsive to strong and knowledgeable local objections than has been evident so far, the result will be irreparable damage to trust and constructive local engagement with the planning process in this area. A context in which neighbourhood plans evidently stand to be swept aside from year to year, at the dictate of distantly-set and unconvincing central government housing growth targets, creates strong disincentives for any Parish Council to invest further resources and local public credibility in the neighbourhood planning process. The result will be a strongly and chronically oppositional relationship between parishes and the local authority in future.

Appendix 1: Analysis of ‘Smaller’ vs ‘Medium’ Villages in Horsham District Council settlement hierarchy

Smaller Villages: criteria/description: ‘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: criteria/description: ‘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 is unlikely to improve) and c) lack of shopping: a single small convenience store and no further plans or opportunities for other supporting retail in the central Thakeham area. **Therefore there is no prospect of Thakeham residents ceasing to remain reliant on larger settlements to access most of their requirements.**
- 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 small size and poor facilities/connections.

¹ Source: https://www.citypopulation.de/en/uk/southeastengland/west_sussex/, with minor rounding; ‘Central Thakeham’ is defined as the area of The Street/Abingworth/High Bar Lane.