

Save Rural Southwater

Step-by-step guide to objecting to the HDC Local Plan 2023 - 2041

KEY INFORMATION

- > **Submission to the portal closes at 5:00pm on Friday 1st March**
- > You will need your name and email address to register and submit comments/objections
- > HDC will accept responses to their Regulation 19 consultation online (preferred option), or by post or e-mail
- > **DO NOT** use expletives, discriminatory or offensive language. Do not make any statements that could be seen as defamatory (that is, do not attack or question any individual's personal reputation). Do not make any statements that may be libellous (that is, do not make comments about an individual or organisation that may be challenged as untruthful).
- > **DO** use any evidence, photos, maps of relevance to your objections
- > **DO** use our template to follow the steps to complete comments/objections
- > You will need to complete a separate submission for each individual objection should you have more than one,

NOTES ON ADVISED OBJECTIONS:

After extensive research regarding the impact on this extreme residential development SRS have identified 5 key areas which should be significantly meaningful to the Inspector reviewing the HDC Local Plan. We have shared our submissions on these areas on the SRS website. You are welcome to use these responses to create your submissions - either copy or amend with your own content:

- Water Neutrality
- Strategic Policy HA3- Southwater as a strategic development site
- Settlement coalescence
- Strategic Policy 2 - Development Hierarchy
- No Hospital/s

We are aware the addition of a new school is at the fore front of residents concerns.

The issue of the school is a red herring. It is being used by HDC to get their Plan agreed, with over 1000 more homes built in our village, but is no more than empty words. Councillor John Milne (who is leading this Plan) stated at a Southwater village meeting on 3 February that HDC has NO CONTROL whatsoever over whether a school will be built or not. The most likely outcome is that a new school will not get the necessary financial backing and Berkeley Homes will then have no further planning obstacles to building yet more houses on that site.

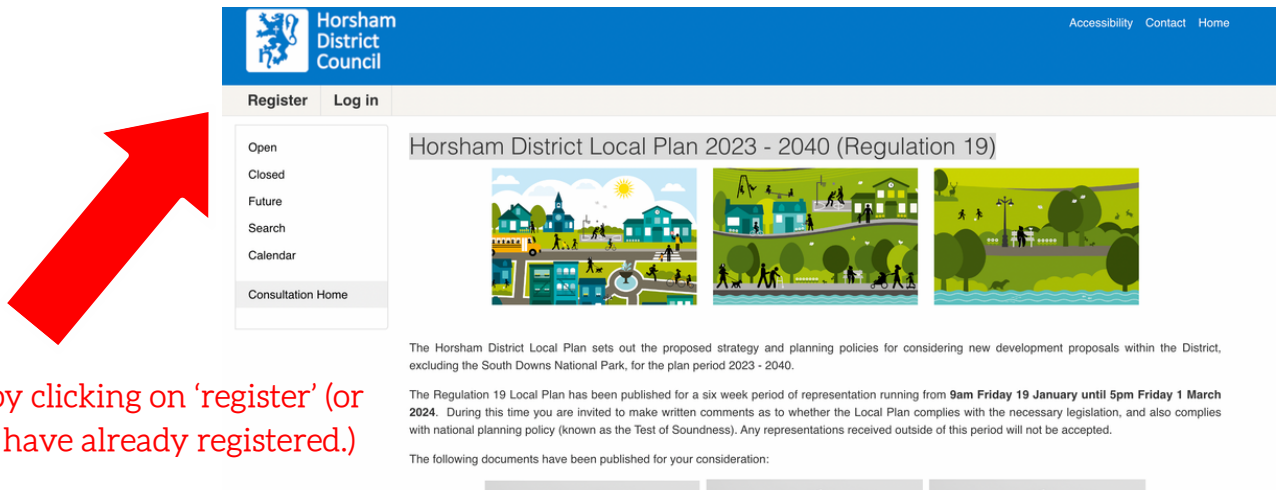
COMPLETING YOUR COMMENTS AND OBJECTIONS ONLINE

STEP ONE: Register on the HDC Portal

(i) Go to this link:

https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/consultationHome

(ii) You will be taken to this page:



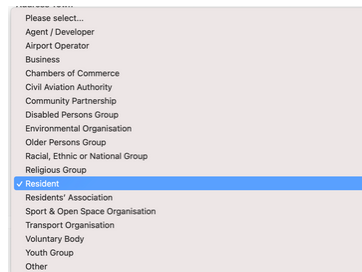
The screenshot shows the Horsham District Council website. The top navigation bar includes the council logo, the name 'Horsham District Council', and links for 'Accessibility', 'Contact', and 'Home'. Below the navigation bar are 'Register' and 'Log in' buttons. A dropdown menu is open under 'Register', showing options: 'Open', 'Closed', 'Future', 'Search', 'Calendar', and 'Consultation Home'. A red arrow points to the 'Register' button. The main content area is titled 'Horsham District Local Plan 2023 - 2040 (Regulation 19)' and features three colorful illustrations of community scenes. Below the illustrations, there is text explaining the local plan and providing information about the consultation period from Friday 19 January to Friday 1 March 2024.

(iii) Register by clicking on 'register' (or 'login' if you have already registered.)

> To register you need to input your name and address

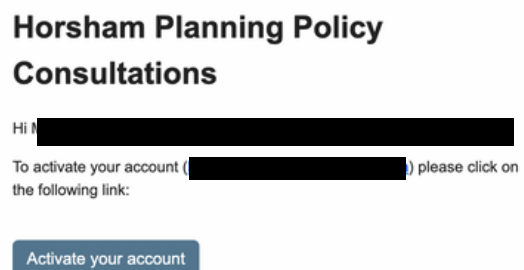
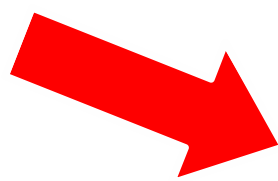
> It will ask if you are a Horsham resident (you do not have to be to respond).

> In the consultee type dropdown select 'resident'



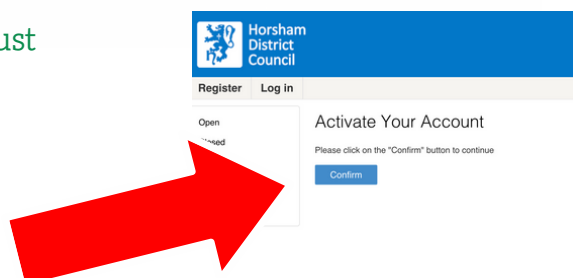
The screenshot shows a dropdown menu with the following options: 'Please select...', 'Agent / Developer', 'Airport Operator', 'Business', 'Chambers of Commerce', 'Civil Aviation Authority', 'Community Partnership', 'Disabled Persons Group', 'Environmental Organisation', 'Older Persons Group', 'Racial, Ethnic or National Group', 'Religious Group', 'Resident', 'Residents' Association', 'Sport & Open Space Organisation', 'Transport Organisation', 'Voluntary Body', 'Youth Group', and 'Other'. The 'Resident' option is selected and highlighted in blue.

> You will receive an e-mail asking you to 'activate' your registration. Go to your email and click the 'activate your account' button.



The screenshot shows an email from 'Horsham Planning Policy Consultations'. The email content includes: 'Hi [redacted]', 'To activate your account ([redacted]) please click on the following link:', and a button labeled 'Activate your account'.

> You will be directed to this page where you must click the 'confirm' button



The screenshot shows the 'Activate Your Account' page on the Horsham District Council website. The page includes the council logo, 'Register' and 'Log in' buttons, and a dropdown menu. The main content area is titled 'Activate Your Account' and contains the text: 'Please click on the "Confirm" button to continue.' and a button labeled 'Confirm'. A red arrow points to the 'Confirm' button.

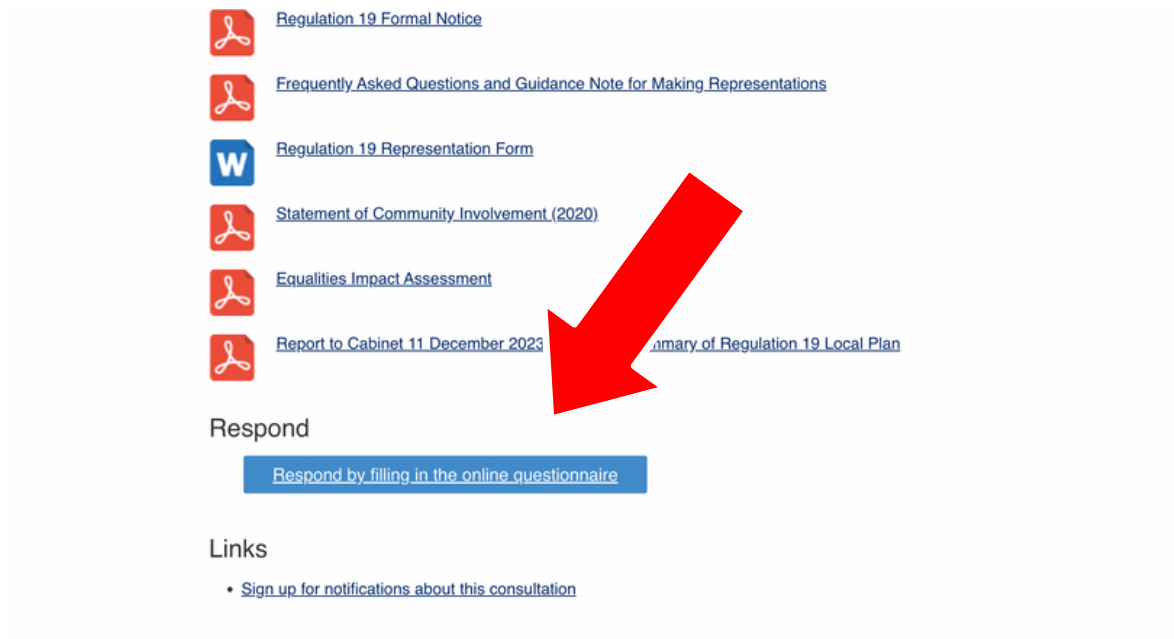
STEP TWO: Login to your Portal

(i) Re-open this page:

https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/consultationHome

You should already be logged in - if you are not, login.

(ii) Scroll down and click 'Respond by filing in the online questionnaire'



The screenshot shows a list of documents with icons: a PDF icon for 'Regulation 19 Formal Notice', 'Frequently Asked Questions and Guidance Note for Making Representations', 'Statement of Community Involvement (2020)', 'Equalities Impact Assessment', and 'Report to Cabinet 11 December 2023'. A Word document icon for 'Summary of Regulation 19 Local Plan'. Below the list is a 'Respond' section with a blue button labeled 'Respond by filing in the online questionnaire'. A red arrow points to this button. Below the button is a 'Links' section with a link: 'Sign up for notifications about this consultation'.

(iii) Confirm whether you would like to be kept informed of further stages:

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) should you wish to be involved further.

Do you consent to being kept informed of further formal stages?

You must provide an answer to this question.

Yes

No



STEP THREE: Completing the questions

QUESTION 1: You will most likely be responding to a Policy:

1)

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

- Paragraph (e.g. '4.35') Policy (e.g. 'Policy 21') Policies Map
 Sustainability Appraisal Habitats Regulations Assessment

QUESTION 1a: State the policy number your comment/ objections relates to;

1 a)

Please state the policy, paragraph or inset map to which your representation relates.

You must provide an answer to this question.

Strategic Policy 9 (paras 5.30 - 5.38 and CH2 para 2.9) Water Neutrality (and non-compliance with Habitats Regulations)

Advice for policy numbers:

Southwater as a strategic development site: Strategic Policy HA3

Water Neutrality : Strategic Policy 9

Settlement coalescence: Strategic Policy 15

Development Hierarchy: Strategic Policy 2

No Hospital/s: Strategic Policy 27

QUESTION 2: Here you may check 1 or more boxes

2)

Do you consider the Local Plan is:

- Legally Compliant - Yes Legally Compliant - No Sound - Yes
 Sound - No Complies with the duty to co-operate - Yes
 Complies with the duty to co-operate - No

QUESTION 3: Complete your personal views on this. If you are concerned as to how to articulate details. feel free to content from our submissions. in the Documents page of the SRS websit the details from our submissions. in the Documents page of the SRS website.e.

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 its duty to co-operate, please also use this box to set out your comments.

Please provide a summary of any attachments, such as supplementary evidence, that you submit alongside your representation.

You must provide an answer to this question.

See pages 3 - 15 and page 16 under "para 2.9 Water Neutrality" in the submission attached which is prepared and filed on behalf of Save Rural Southwater and the Stammerham Ammenity Association whose statements of interest appear on pages 2 and 3 of the document.

You can upload up to 10 files.

 [SRSSAA DP consultation response final.docx](#)

QUESTION 4:

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 in response

You must provide an answer to this question.

The only way this policy can be rendered legally compliant and sound is by ;

- requiring LPAs to establish and implement a proper and effective water neutrality strategy which complies with the requirements of the Habitats Regulations, and
- substituting a realistic water use target for any new development in the draft plan. A target which is evidence based, using actual consumption experience from recent new developments of which there are countless across the district, and
- requiring LPAs to strictly apply the policy through (a) rigorous scrutiny of applications and supporting actual water use evidence, (b) actual post build water use monitoring and (c) enforcement for non-compliance with water use targets, duties already delegated to them by NE but which are not currently being observed by LPAs.

QUESTION 5: It is your choice whether you would like to request to participate in the examination hearing session(s)

5)

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

QUESTION: If you have requested to attend the hearing you must answer as to why this is important.

6)

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

If you do not wish to participate, please reply 'N/A'.

STEP FOUR: FINISH your submission

(i) You must complete all questions before clicking finish

PLEASE DO NOT SUBMIT MULTIPLE COPIES OF THE SAME RESPONSE. IF YOU HAVE COMPLETED THIS ONLINE FORM, THERE IS NO NEED TO SEND A COPY OF THE SAME REPRESENTATION BY EMAIL OR POST.

Finish



(ii) Once you click 'finish', you will be shown this message:

Horsham District Local Plan 2023 - 2040 (Regulation 19)

Thank you for responding

You should receive a confirmation email within the next few minutes.

You can view or update your response at any time whilst the consultation is open. To do this, go to the [consultation homepage](#) and click on [My Responses](#). A link for this will be included in your confirmation email.

What would you like to do now?

- [View your response](#)
- [Download your response as a PDF](#)
- [Return to the consultation homepage](#)

(iii) You will also receive a confirmation email

(iv) The email will contain a link allowing you to view your response – you can use this link to edit comments (before 1/3/24)

WHAT SHOULD I WRITE?

We are not here to tell you what to write, just how to do it! However, should you wish to use our submissions to either copy or amend with your own details, see our responses below.

NOTE: You must make a separate submission for each Policy comment/objection.

We have made 5 submissions:

- Development Hierarchy: Strategic Policy 2
- Water Neutrality : Strategic Policy 9
- Southwater as a strategic development site: Strategic Policy HA3
- Settlement coalescence: Strategic Policy 15
- No Hospital/s: Strategic Policy 27

TITLE	Development Hierarchy
1.Which part?	Policy
1 a) Policy Number	Strategic Policy 2 - Development Hierarchy para 4.33
2. Do you consider the local plan?	Sound - No
3. Details	<p>The policy provides that it is important that future growth takes place in a manner that protects, retains and enhances the rural landscape character and that with this objective expansion of existing settlements must be carefully managed. The proposed huge expansion of the Southwater BUAB fundamentally conflicts with this policy and with the current Southwater Neighbourhood plan and is unsound.</p> <p>Strategic Policy 2.1 requires development in secondary settlements (eg Southwater) "to be limited in scale to reflect the existing scale and character of the settlement function and form". The plan puts no upper limit on the scale of the expansion ("at least 1000" homes) and hugely expands and elongates the footprint of Southwater village. It is not, as required, "limited in scale to reflect the existing scale and character of the settlement function and form". It is far from it, massively expanding and further elongating what is already one of the longest ribbon villages in the South East.</p>
3. Attachments	Documents: Southwater Growth (see on the Documents page of the SRS website)
4. Advise modifications	<p>The proposed expansion of the Southwater BUAB conflicts with the plan policy on development hierarchy and should be rejected in favour of the extended Southwater BUAB contained in the Southwater Neighbourhood plan which already provides for an additional housing allocation of 450 homes and land for a new school (if needed) and is of an appropriate scale as required under Strategic Policy 2</p>
5. Attending hears	<i>*Your choice</i>
6. Why is it necessary to attend the hearing	<p><i>*Your choice</i></p> <p>Yet again, HDC has identified Southwater as a convenient dumping ground for huge scale housing development. The once small rural village has been subjected to 40 plus years of continuous large scale housing development and remains a building site with almost 300 homes already approved but still to be built by HDC's favoured developer, Berkeley Homes which in recent years has deliberately slowed build rates and now stopped building to avoid oversupply and protect its profit margins, subjecting the village to even more years of building disruption.</p> <p>The village footprint has already trebled in size since the mid 1980s and with the proposed extension of the village BUAB in the draft plan will have more than quadrupled. The village has take more than enough and its voice should be heard.</p>

TITLE	Water Neutrality
1.Which part?	Policy
1 a) Policy Number	Strategic Policy 9
2. Do you consider the local plan?	<p style="text-align: center;">Legally Compliant - No</p> <p style="text-align: center;">Sound - No</p>
3. Details (add attachments)	<p style="text-align: center;">See pages 3 - 15 and page 16 under "para 2.9 Water Neutrality" in the submission attached which is prepared and filed on behalf of Save Rural Southwater and the Stammerham Amenity Association whose statements of interest appear on pages 2 and 3 of the document.</p>
3. Attachments	<p style="text-align: center;">Documents: SRSSSA _ DP consultation response final (see on the Documents page of the SRS website)</p>
4. Advise modifications	<p style="text-align: center;">The only way this policy can be rendered legally compliant and sound is by ;</p> <ul style="list-style-type: none"> • requiring LPAs to establish and implement a proper and effective water neutrality strategy which complies with the requirements of the Habitats Regulations, and • substituting a realistic water use target for any new development in the draft plan. A target which is evidence based, using actual consumption experience from recent new developments of which there are countless across the district, and • requiring LPAs to strictly apply the policy through (a) rigorous scrutiny of applications and supporting actual water use evidence, (b) actual post build water use monitoring and (c) enforcement for non-compliance with water use targets, duties already delegated to them by NE but which are not currently being observed by LPAs.
5. Attending hears	<p style="text-align: center;"><i>*Your choice</i></p>
6. Why is it necessary to attend the hearing	<p style="text-align: center;"><i>*Your choice</i></p> <p style="text-align: center;">Our response: Water Neutrality is critical to the sustainability of water supply in the SNWRZ. The current HDC approach and the provisions in the draft plan are fundamentally flawed and fatally undermine the clear objective of ensuring water neutrality. This puts the entire SNWRZ from Chichester to Crawley at immense risk of water supply failure. The Plan simply cannot endorse this most fundamental flaw on which the entire plan is founded.</p>

TITLE	Southwater as a strategic development site
1.Which part?	Policy
1 a) Policy Number	Strategic Policy HA3 - Land North West of Southwater
2. Do you consider the local plan?	Sound - No
3. Details	<p>Once again, HDC has identified Southwater as a convenient dumping ground for huge scale housing development. The once small rural village has been subjected to 40 plus years of continuous large scale housing development and remains a building site with almost 300 homes already approved but still to be built by HDC's favoured developer, Berkeley Homes which in recent years has deliberately slowed build rates and now stopped building to avoid oversupply and protect its profit margins, subjecting the village to even more years of building disruption.</p> <p>The village footprint has trebled in size since the mid 1980s and with the proposed extension of the village BUAB in the draft plan will have more than quadrupled. The village population has grown correspondingly. The houses which are being built do not address local housing needs – they are very largely unaffordable for those in the local area and are being marketed by the developers as far afield as mainland China.</p> <p>The designation of Southwater as a Strategic Site conflicts with the following spatial objectives set out in the plan Page 19 Table1);</p> <p>Objective 1- the plan fails this objective. The overdevelopment of Southwater will not as required “deliver a thriving community with a strong sense of place”. Quite the opposite.</p> <p>Objective 3 - the plan fails this objective. The overdevelopment of Southwater by transforming almost 300 acres of agricultural land into housing and related development will not as required “..preserve the unique landscape character and the contribution this makes to the setting of rural villages’ nor will it “ ensure that new development minimises the impact on the countryside”. Quite the opposite.</p> <p>Objective 4 - the plan fails this objective. The overdevelopment of Southwater will not as required “safeguard and enhance the environmental quality (of the village) nor will it maintain or enhance ecosystem services, or deliver biodiversity net gain”. Quite the opposite.</p> <p>Objective 10 - the plan fails this objective. The overdevelopment of Southwater will not as required “respect the scale” of the existing village, nor will it in the hands of the developers proposed “deliver the requisite range of housing”. Quite the opposite.</p> <p>Southwater should not be designated as a Strategic Site in the plan for the reasons set out in pages 17-24 of the consultation response attached.</p>
3. Attachments	Documents: SRSSSA_ DP consultation response final
4. Advise modifications	Southwater should not be designated as a Strategic site in the plan and should be removed. The development proposed fails to meet and conflicts with the spatial objectives set out in the plan and is therefore not sound.
5. Attending hears	<i>*Your choice</i>
6. Why is it necessary to attend the hearing	<p><i>*Your choice</i></p> <p>This Consultation response process is not easy or straightforward and it's complexity discourages a very great many affected residents from communicating their views on issues which will massively impact on them. Their views should be publically heard in the process and evaluated on their merits by the Inspector whose decisions will impact on, in the case of Southwater alone, in excess of 12,000 residents.</p>

TITLE	Settlement coalescence: Strategic Policy 15
1.Which part?	Policy
1 a) Policy Number	Strategic Policy 15
2. Do you consider the local plan?	Sound - No
3. Details (add attachments)	The policy is not sound. The inclusion of the approximately 300 acres of open farmland and countryside north and west of Southwater within the village BUAB offends the plan Strategic Policy 15 of preventing settlement coalescence. Extending the village as proposed will result in the settlement impacting on and coalescing with existing settlements at Christ's Hospital, Tower Hill, Two Mile Ash and Horsham. Contrary to Strategic Policy 15.1, development within the extended the BUAB would very significantly reduce "the openness and break between (the) settlements".
3. Attachments	None
4. Advise modifications	To protect against coalescence the Southwater BUAB should not be extended beyond the BUAB identified in the current Southwater Neighbourhood Plan
5. Attending hears	<i>*Your choice</i>
6. Why is it necessary to attend the hearing	<i>*Your choice</i> This issue dovetails with separate objections in relation to Spatial planning and the Conflict with the Neighbourhood plan and can conveniently be addressed together.

TITLE	No Hospital/s
1.Which part?	Policy
1 a) Policy Number	Strategic Policy 27
2. Do you consider the local plan?	Sound - No
3. Details (add attachments)	<p>Plan Strategic Policy 27 – Health p.94 para 8.32 “The need for a hospital has not been identified as required in this Plan”.</p> <p>For 24 hour A&E treatment Horsham/Southwater residents have to go either to Redhill or to Worthing hospitals. Which depending on traffic can take from 40 minutes to over an hour. And when patients do get to these hospitals there are most often long delays to be seen/treated. With the scale of the already permitted development yet to be completed, and the huge increase in housebuilding foreseen in the draft plan, more proximate 24 hour hospital facilities are essential.</p> <p>Furthermore existing GP surgeries and pharmacies are already at operating at overcapacity. Doctor appointment delays of over a month are increasingly common and there are regular long queues at local Pharmacies</p> <p>The plan is not sound for the district, and in particular for Horsham and Southwater, through its failure to identify the need for additional hospital facilities to cope with existing and what will be much exacerbated future demand from patients.</p>
3. Attachments	None
4. Advise modifications	The plan should identify the need for new hospital facilities and provide for this to be built and operational before any development on any of the large scale/Strategic sites in the plan is commenced.
5. Attending hears	<i>*Your choice</i>
6. Why is it necessary to attend the hearing	<i>*Your choice</i> Like water neutrality this is a very fundamental and critical issue for all residents across the district quite literally a matter of life or death. It cannot simply be swept under the carpet as the plan seeks to do and the views of residents deserve and need to be heard on this issue.