

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 10 September 2024 23:58:55 UTC+01:00
To: "Planning" <planning@horsham.gov.uk>
Subject: Comments for Planning Application DC/19/2464
Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10/09/2024 11:58 PM.

Application Summary

Address:	Berkeley Homes Development Site Worthing Road Southwater RH13 9BT
Proposal:	Erection of 94 dwellings with associated access, parking and landscaping at Land West of Worthing Road (Phase 5), Southwater
Case Officer:	Matthew Porter

[Click for further information](#)

Customer Details

Address: 7 The Laurels Southwater HORSHAM

Comments Details

Commenter Type:	Member of the Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Highway Access and Parking - Other - Overdevelopment
Comments:	It is requested that the Committee reject the application on grounds of the failure of its proposals to comply with national and local policy requirements in three main areas: housing 'mix' and density; environmental sustainability; and water neutrality.

Housing 'mix' and density

Notwithstanding Berkeley Homes' proposed amendment of planning application DC/19/2464 so as to allow the delivery of an altered housing 'mix' and layout plus an additional 14 homes (reallocated from the neighbouring Phase 4 site), it is claimed that Phase 5 would still accord with the outline permission 'parameter plans' approved for the whole Broadacres development in 2015 (Planning Statement 2024 paras. 1.4, 1.7). In answer to this assertion it may firstly be observed that, though the proposed increase in the number of Phase 5 homes from 80 to 94 would deliver a stated housing density of 20dph (para. 3.7), this figure is admitted to be below the 24dph envisaged in the 2015 outline planning permission, and thus arguably fails to promote an effective use of the land by optimising housing densities in accordance with both national and local planning policies (eg. NPPF para. 129; HDPF Policies 32, 33). As regards alteration of the Phase 5 housing 'mix', it is claimed that whilst the mix now proposed 'does not exactly match' that sought by the latest Northern West Sussex Strategic Housing Market Assessment (SHMA), 'it is considered that it responds more positively to the requirements and reflects the site's location' and 'is consistent with that agreed to be acceptable by officers through the recent pre-application advice process' (para. 5.7). In answer to these claims, it must be pointed out that the NW Sussex SHMA indicates for the Horsham District a market-housing mix comprising 75% one-, two- and three-bedroom dwellings and only 25% 4/5-bedroom homes, whereas the Phase 5 housing mix now proposes just 24 two- and three-bedroom homes but 70 four- and five-bedroom houses - the converse of the SHMA position that somewhat contradicts the claim that the development would provide (for whom?) 'much needed housing within Southwater' (para. 1.9). Whatever may have been agreed in secret between the developer's representatives and HDC officers as part of the 'recent pre-application advice process' (no minutes of their April meeting in fact appear in the Statement's Appendix 2 - contrary to para. 2.13), Policy 16 of the HDPF - reflecting NPPF para. 63 - clearly requires new residential development to provide the mix of housing sizes, types and tenures 'as evidenced in the latest [SHMA]'. It might also be asked why, if as the developer claims, DC/19/2464 is a 'separate full standalone planning application' rather than a reserved matters application (yet 'within the parameters of the outline permission': para. 1.4), it has been allowed to omit any on-site provision for non-market 'affordable' homes (as would be required by HDPF Policy 16.1 - were it not for Policy 16.4), with these instead delivered - mainly as flats - across Phases 1 to 4 'under the original outline planning permission' (para. 2.8).

Environmental sustainability

The updated Planning Statement (para. 5.23) advises that, for the 94 homes now planned for the Phase 5 site: all two-bedroom houses will be allocated at least two parking spaces if not also a

single garage; three-bedroom houses allocated three parking spaces including a single garage; four-bedroom houses allocated three parking spaces including either a single garage, integrated garage or car port; and five-bedroom houses allocated four parking spaces including a double garage. Thus as a minimum, almost 300 allocated parking spaces are proposed (not including the visitor parking spaces to be provided 'on-street in key locations': para. 3.11), which is admitted to be in excess of the number needed to comply with current WSCC guidance appropriate for the number of homes planned (para. 5.24), and may appear an over-generous level of provision in the face of policy stipulations that new developments should be planned so as to promote walking, cycling and public transport use (eg. NPPF para. 108). The proposed level of parking provision may however be an admission that it may not be possible for the site to be 'made sustainable, through limiting the need to travel and offering a genuine choice of transport modes' (NPPF para. 109), due its being relatively remote from both the nearest bus stop in College Road (200m. away) and Southwater Village centre at Lintot Square (up to 0.5 km. away). Given that the proposed roads layout of the adjacent Phase 4 site does not apparently allow roadway access onto nearby existing roads accessible to buses (Woodlands Way and College Road), it is difficult to see how any local bus service could viably serve homes on the Phase 5 site also, which will have regular vehicular access at two points only on Phase 4's Kensett Avenue 'spine road', itself accessible only from Church Lane. Occupants of the development's predominant "high-end" properties might not be thought likely to use buses in any case, and whilst the Transport Statement accompanying the original application asserts that the road layout 'has been designed to provide access for refuse collection and emergency vehicles' (para. 4.16), it tellingly makes no mention of buses. Although the Transport Statement notes (para. 4.14) that each garage will be equipped with cabling for an electric vehicle (EV) charging point, and that two communal charging points will be provided next to the visitor parking spaces, there is however no guarantee that the new residents will use electric cars in preference to diesel- and petrol-driven vehicles, and therefore the future exhaust-emission impacts of almost 300 additional such vehicles must be taken into account, in addition to those from PSVs servicing the development. The issue of air quality was first considered when outline permission was sought for the entire Broadacres site, the case officer at that time advising that: "the submitted assessment also shows that the development would be likely to result in a small to imperceptible change in the level of nitrogen dioxide (NO₂) and an imperceptible change in particulate matter (eg. PM₁₀) pollutants, which are emitted from petrol and diesel vehicles" (Officers' Report on Phase 1 at para. 6.47). The updated Air Quality Assessment accompanying the amended Phase 5 application broadly confirms this reassuring conclusion (paras. 5.21-25), so that whereas for the construction phase a mitigation scheme is proposed within the Constrcution

Effects Management Plan, no mitigation plan is proposed during the "operational" phase of the development (para. 6.17), as would otherwise be required by the Air Quality and Emissions Mitigation Guidance for Sussex (2021).

With regard to the sustainability of the development in terms of energy efficiency and carbon reduction, the updated Energy Statement claims that the development will 'target compliance with Part L 2021 of the Building Regulations, which represents an uplift to Part L 2013 equivalent to ~31% reduction in carbon emissions', and so achieve 'an inherent improvement to the energy efficiency of the scheme from the previously submitted Statement' (para. 3.6). In making this claim the updated Statement appears to conflate improvements in energy efficiency with reductions in carbon emissions (as if one automatically equates to the other), stating further that 'The energy strategy presented prioritises high-performance building fabric [... and...] building systems' (para. 7.5), yet 'additionally incorporates low-carbon technologies in the form of high-efficiency air-source heat pumps' (para. 7.6), such as would deliver a 56.9% carbon reduction beyond the Part L 2021 baseline. The inclusion of photo-voltaic (PV) panels on roof slopes is consequently considered unnecessary as these are 'not required to achieve the carbon reduction requirements of the development' (para. 5.15) - an omission that many would see as representing a lost opportunity to satisfy on-site the increased electricity demand that would arise from EV recharging (which may not have been factored in by the SAP 10.2 methodology used cf. para. 4.4).

Water neutrality

In order to comply with Natural England's requirement that all new development within the Sussex North Water Resource Zone must demonstrate 'water neutrality', an updated Water Reduction Strategy has additionally been submitted that purports to show that, by following a three-step 'mitigation hierarchy', the proposed development will reduce water consumption 'as much as possible' (p. 2) and therefore not adversely affect the Arun Valley habitat sites contrary to section 63 of the Conservation of Habitats and Species Regulations 2017 (also NPPF para. 180 and HDPF Policy 36).

As a first step, it is considered that an average consumption of 85 litres per person per day would be a 'realistic target' (Strategy # 4.2), to be achieved through usage reduction measures such as the installation in each new home of water-efficient fixtures and appliances (plus rainwater butts for external water use), even though it is admitted that the resulting estimate of total on-site consumption 'cannot account for individual occupant behaviour' (# 4.3). In other words, the estimated figure for the development's total water consumption rests on the assumption that every occupant will for the indefinite future use no more than 85 litres daily from the public supply, the Strategy itself admitting that 'A culture of water saving and understanding the value of water resources will be critical to ensure [that] water-efficient fixtures

and appliances installed in the homes are accepted and remain in place' (# 4.1.3). In an attempt to inculcate such a "water saving culture" (etc), 'Therefore, home user manuals and building user guides will be provided for [all?] future occupants [...] explaining the value of the systems installed as well as guidance on how to adopt water-saving behaviour' (# 4.1.4). As a second step, it must be considered whether the development's water consumption figure could be reduced further through the adoption of water capture and reuse measures (such as rainwater harvesting and 'greywater' recycling), but since the 'technical and cost implications of these measures limit the practicality of their installation' (# 4.1.5), it is proposed only to install rainwater butts outside each house, thereby supposedly achieving the "target" consumption figure of 85 litres per person per day.

As the third step in the mitigation hierarchy, consideration must however be given to offsetting 'in perpetuity' Phase 5's resulting residual consumption of 38,838 litres, and here the Strategy fails to offer any currently workable solution, stating that though offsetting may be achieved by enabling and supporting water-saving schemes involving existing properties with Southern Water supply in the Sussex North Zone (# 4.19), 'At the time of writing [June 2024], no third-party offsetting scheme has been secured' (# 4.23). (It should be noted that the updated Strategy nowhere mentions the developer using its consented but unbuilt-out developments at Highwood and Broadacres to offset Phase 5's residual water consumption). In the absence of any such scheme, the Strategy (# 5.2) proposes merely that a developer contribution would be paid in lieu based on a 'tariff payment mechanism' under the Sussex North Offsetting Water Scheme (SNOWS) 'once available', whereas 'Further discussions with the Council will be required in order to fully develop the offsetting strategy' (# 4.23). Given that Berkeley Homes' approach to water neutrality in this amended application appears little different from that contained in its outline application DC/22/1916 (to develop land north west of Southwater), it is therefore to be hoped that DC/19/2464 will be rejected for the same reason as was outlined by the Council's Strategic Planning section in respect of that (subsequently-withdrawn) application, namely that in the absence of an adopted offsetting scheme this application is unable to demonstrate water neutrality.

Kind regards