
From: Planning@horsham.gov.uk
Sent: 08 January 2020 23:31
To: Planning
Subject: Comments for Planning Application DC/19/2464

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

Comments were submitted at 11:42 PM on 08 Jan 2020.

Application Summary

Address: Berkeley Homes Development Site Worthing Road
Southwater RH13 9BT

Proposal: Erection of 80 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
- Loss of General Amenity
- Other
- Overdevelopment
- Privacy Light and Noise
- Trees and Landscaping

Comments: Although Berkeley Homes (BH) was granted outline planning consent in 2015 for the residential development of 'Land West of Worthing Road, Southwater' (of which the present application site forms part), that permission conceded only the principle of development with all details (other than access) to be considered as 'reserved matters' in separate development phase applications; each of these must comply with both local plan policies and national law and planning guidance, and it is my contention that the present application fails to do so in at least four areas: housing mix, transport sustainability, air quality and green infrastructure.

Housing mix and density
In the Design & Access Statement accompanying the present application, it is claimed (DAS # 3.1) that BH's Phase 5 development proposals comply with all relevant policies of the Horsham Development Plan Framework

(HDPF), as well as with the provisions of the National Planning Policy Framework (NPPF). However, as the Officers' Report on the Phase 1 application observed (# 6.12), the NPPF contains a requirement to plan for a mix of housing sizes, types and tenures in new developments (para. 61, 2019 revision), and within this context HDPF Policy 16.1 requires that the mix of housing types (etc) should be based upon evidence set out in the latest Strategic Housing Market Assessment (SHMA). Whereas the latest SHMA Updates indicate a rising need for 2- and 3-bedroom 'affordable' units across the District, homes of this size comprise only 10 of the 80 units proposed for the present application site with the other 70 comprising 4- and 5-bedroom units, and none are proposed as 'affordable' homes. Conveniently for BH, HDPF Policy 16.4 provides that if a development site - such as 'West of Worthing Road' - is sub-divided so as to create two or more separate development schemes (or phases), one or more of which fail to provide the level of affordable housing required, the deficiency may be met from among the others so as to 'reflect the provision that would have been achieved on the site as a whole had it come forward as a single scheme.' The 2015 outline consent required the provision across the whole site of 178 affordable units to comprise a mix of 50% affordable-rent and 50% shared-ownership properties, though as the above-mentioned Officers' Report admitted (# 6.14): 'At the time of considering the outline application it was noted that this 50/50 split did not strictly accord with the local policy requirement of 62.5% affordable-rent properties and 37.5% shared ownership' but 'this was considered to be a viable and deliverable mix'.

As the Affordable Housing Statement accompanying the present application confidently asserts (p. 6), all of the affordable housing units specified by the outline permission having been provided for the site as a whole by Phases 1 to 4, Phase 5 is proposed as fully private tenure with no additional affordable housing. The 178 affordable homes thus provided - all but 54 of them flats - however represent only 30% of the 594 units for which outline permission was granted, rather than the 35% required by HDPF Policy 16.3 (and its predecessor in force at the time), and though this reduction was doubtless made on grounds of viability (ie. to preserve BH profit margins), there is reason to believe that the 30% figure was at the time intended as a starting-point or minimum number. Thus the above-cited Officers' Report observed (# 6.14) that 'In addition the developer agreed to pay a contribution of £295,000 to be used as a grant to Registered Providers to increase the level of affordable-rent properties at the site,' but from the present Housing Statement it is evident that no such grant has yet been made as no additional such units have been provided. A further consideration for the Council of allowing so many units of the type proposed for Phase 5 lies in the fact that "executive" commuter homes of this size might become harder for BH to sell in the recessionary conditions likely to follow any post-Brexit withdrawal of EU Market access from City of London financial institutions, with the resultant slowing of completions undermining the Council's ability to

maintain its housing output trajectory. This situation could be avoided if the number of 4- and 5-bedroom properties on the site were to be reduced and the number of 2- and 3-bedroom homes increased, which would also enable the site to accommodate more units overall thereby raising housing density from 16 d.p.ha. (excluding retained 'green space') to something approaching that which would make the most efficient development use of the land (as required by NPPF para. 123); planners may note that Barratt Homes recently accepted just such an approach with respect to its Ganger Farm Lane development in Romsey (Southern Daily Echo, 7 Jan. 2020).

Transport sustainability

In line with the the supposed expectations of prospective buyers, the executive commuter homes planned for the Phase 5 site are to be provided with generous car-parking facilities (typically double garages and drive-ways), the Transport Statement accompanying the planning application admitting (# 4.10) that a total of 272 allocated parking spaces are proposed, well above the 230 needed to comply with current WSCC guidance appropriate for the number of homes planned, and not including the 12 visitor parking spaces to be provided parallel to the public road. Whereas even the WSCC-recommended level of parking provision may appear over-generous in view of NPPF stipulations (# 102-111) to plan new developments so as to encourage the uptake of public and 'non-motorised' modes of transport, it is apparently made necessary by the location of the site within 'accessibility Zone 2', being relatively remote from both the nearest bus stop in College Road (200m. away "as the crow flies") and the village centre at Lintot Square (up to 0.5 km. away). Given that the proposed road layout of the adjacent Phase 4 site does not apparently allow road access onto nearby existing roads (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 (cf. NPPF para. 110(a)), which will have regular vehicular access at two points only on Phase 4's Kensett Avenue, 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 asserts (# 4.16) that the road layout 'has been designed to provide access for refuse collection and emergency vehicles' it tellingly makes no mention of buses. Notwithstanding these realities, the Statement asserts (# 5.1-2) that a 'Travel Plan' has been drawn up that will contain a number of (unstated) objectives to improve sustainable travel to and from the site, that these will be assessed against (unspecified) targets to be achieved within specific (but unstated) timescales, and that 'Measures and Initiatives will then be put into place to meet these Targets'. The Travel Plan will provide details of a Travel Co-ordinator, who will 'oversee day-to-day implementation of the Plan, monitor its Targets and put Measures into place to achieve these' (# 5.3), but as the Plan will run only until a set time after the last house is occupied, encouragement of sustainable

transport options thereafter appears wholly reliant upon the 'Travel Information Pack' to be provided to the development's first residents with no guarantee that it will be passed on to subsequent occupants.

Air quality

Although the Transport Statement notes (# 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 no guarantee that new residents will use electric cars in preference to diesel- and petrol-driven vehicles, and therefore the future exhaust-emission impacts of as many as 280 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 'West of Worthing Road' 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 (PM₁₀) pollutants, which are emitted from petrol and diesel vehicles" (Officers' Report on Phase 1 # 6.47). The Air Quality Report accompanying the Phase 5 application broadly reiterates this reassuring assessment (# 5.21-22), but it does admit that development-generated traffic has the potential to impact on Air Quality Management Areas at Cowfold and Storrington (# 4.5), whilst its Table 4.2 shows a one-eighth increase in NO₂ concentrations in 2018 over 2017 (27.3 from 24.5 micro-grams per cubic metre) as monitored from a point on Worthing Road close to the Phase 1 site. In the absence of any alternative explanation it might therefore be assumed that at least part of the monitored NO₂ increase is attributable to vehicles accessing the newly-occupied housing on the Phase 1 site, which must surely call into question the effectiveness of the 'Green Travel Plan' that was required by Condition 26 of the 2015 outline permission, and consequently also that of the Travel Plan enunciated in the current Transport Statement. Unsurprisingly, little mention is made by the AQR of the noise impacts on existing residents of up to 280 additional cars using the link roads to the proposed development, beyond admitting (# 5.17) that, with the completion of the development, there is predicted to be an increase of as much as 82.2% in 24-hour traffic flows along Link 1 - Church Lane ('East of Site' access). Neither does the Report appear to take any account of the cumulative impacts of air - much less noise - pollution, when that arising from development on this site is cumulated with that from the Phase 1-4 sites, as required by the Air Quality And Emissions Mitigation Guidance for Sussex (2019) - and as a result of the Report's failure to follow this Guidance the Council's own Environmental Protection Officers now consider its conclusions void.

Green infrastructure and biodiversity

Concern has been expressed by nearby residents at

proposals to remove significant stretches of hedgerow along the site perimeter and that too many of its trees have been ear-marked for removal, such as would lessen the capacity of this 'green infrastructure' to screen the new housing from, and thereby soften its impact upon, adjacent countryside to the south and west. The Arboricultural Impact Assessment accompanying the Phase 5 application indeed confirms that, in order to facilitate site access, there will need to be removed 20m. and 11m. sections of the eastern perimeter hedges (which it judges not to be of 'a quality that should present any constraint to development': para. 3.7.4), together with sections of the hedgerow along Shaws Lane totalling 10.5m. - though the accompanying Ecological Assessment judges this to be 'species rich' (# 4.2.7) and so likely to be classified as important under the Hedgerow Regulations 1997. The accompanying Tree Report notes that there are 37 individual trees and two groups of trees on the site which, being only 'C' category, can likewise be removed where they would impose a significant constraint to development, but admits that though these are of low individual quality, they have 'landscape value as screening' (# 4.6). The value of such 'green infrastructure' is also recognised in other respects by the HDPF, which states that, in addition to acting as corridors linking wildlife habitats (# 9.30), such trees and hedgerows can contribute to the provision of 'ecosystem services' (# 9.27), including flood prevention through rainfall absorption. Concern has been expressed by nearby residents that the removal of stretches of boundary vegetation will lessen its capacity to perform this drainage function and so increase the risk of flooding (especially if site heights are raised as a result of groundworks); though there is stated a commitment to replace 'where appropriate' those trees that need to be removed, experience shows that it may take many years for any replacements to reach a size that would enable them to adequately perform comparable drainage and screening functions. In view of these considerations it is therefore arguable whether the present proposals meet the conditions for new development stipulated in HDPF Policy 31, which inter alia states that 'Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigate or compensate for this loss, and ensure that the ecosystem services of the area are retained'. Instead, it is suggested that the proposed 'ecological mitigation' zone (DAS # 6.2) should extend the whole length of the Shaws Lane and south-western boundaries of the site and include their entire tree belt (whilst removing the 'play areas' advised against by Sussex Police: letter of 3 Jan. 2020), with those of its trees listed for removal re-evaluated so that those actually removed comprise only those that pose a safety hazard that cannot be remedied by tree surgery.