



## Warnham Parish Council's response to Horsham District Council Local Plan Review 2018, Issues and Options - Employment, Tourism and Sustainable Rural Development

### Background

The on-line form requires a separate submission for each section commented upon. There are three sections;

2. Economic Development
3. Tourism
4. Sustainable Rural Development.

The review schedules **Key Employment Areas (KEA)** in the District and identifies further sites throughout the District which could be considered as KEA. There are none in Warnham parish. The closest is west of the Lawson Hunt KEA in Broadbridge Heath. As this is not within the parish and as the commenting procedure requires a separate submission on each section no comment is proposed on this.

The section on **tourism** proposes a more supportive role in the development of visitor accommodation at leisure facilities such as golf courses, equestrian centres, fisheries etc. and the South Downs National Park. This will have little immediate impact on Warnham but could facilitate the provision of visitor accommodation on a minor scale within the parish. It also supports tourism attractions including cycle routes which may be of benefit. No submission is proposed on this section.

The National Planning Policy Framework (NPPF) promotes sustainable development and prosperity in rural areas. Horsham's HDPF also promotes **sustainable rural development**. The review has sought to identify rural hamlets where a degree of infill would support rural economies. HDPF has identified sustainable communities and identified their limit by defining a Built-Up Area Boundary (BUAB) around such communities. Warnham village has a BUAB. Other hamlet in the parish are, to date, unclassified and as such have a presumption against development as they are basically unsustainable.

The HDC review has re-considered existing BUABs and proposed changes mainly to correct anomalies that have occurred in the original BUABs. Minor amendments are proposed for Warnham's BUAB. These are to incorporate existing individual properties on the edge of the BUAB and are situated on School Hill, Bailing Hill, Friday Street and Bell Road. All proposed amendments are logical and no comment is necessary.

The review has re-considered all hamlets and identified those where limited development may be appropriate on small gaps or plots to promote community cohesion and support local employment. These they term '**Secondary Settlements**'. Kingsfold is proposed as a Secondary Settlement. In the assessment of Kingsfold HDC recorded it as 'having properties fronting the road (the A24) which provide a clear sense of arriving and departing, and buildings vary in age and scale which creates a sense of place'. They acknowledge that Kingsfold however has limited services and facilities and residents are reliant on the car to access all their needs. It is noted that Kingsfold has a public house and employment at the builders' yard. They omit to mention the bus service and the car repairers.

The proposed BUAB for Kingsfold is tightly defined to encompass the built area of Kingsfold. There are no apparent gaps or plots within it to provide scope for limited development and hence the designation as a Secondary Settlement appears to be without purpose.

A sample of local opinion determined by the Kingsfold Residents Association showed total support to maintain the current settlement status.

A constant theme of the NPPF, HDPF and Neighbourhood Plans is sustainability. HDC acknowledge that residents are car dependent in Kingsfold, and hence it is fundamentally not sustainable. It has no services or facilities (school, shops, leisure outlets, social functions etc.) which could have contributed to sustainability. There is clearly not a priori rationale for the designation of Kingsfold as a Secondary Settlement / BUAB. The great risk is the continued pressure from developers. With a BUAB this could be seen as an opening for developers to produce an argument to extend the BUAB to include surrounding land for development, as with Warnham village in the NDP. A strong argument developers could use is that the creation of a BUAB demonstrates that HDC now regards Kingsfold as sustainable.

## **Parish Council Consultation Response**

### **Section 4. Sustainable Rural Development.**

Warnham Parish Council have studied the Local Plan Review and consider that there is no logic or justification to re-classify Kingsfold as a Secondary Settlement. By HDC's own assessment Kingsfold has no services or facilities except a public house and that car transport will be essential, with no train station and a limited bus service that runs only from 7am to 7pm. Kingsfold cannot therefore be considered as sustainable and hence development at Kingsfold will be contrary to a basic requirement and policies of the NPPF, HDC's HDPF and Neighbourhood Plans. Additionally:

1. The A24 severs the hamlet which makes community integration difficult. There is no safe means of crossing the A24 which has continuous heavy traffic and high speeds due to a 40 mph speed limit, despite road frontage housing. It has a significant accident record, particularly so at the junction adjacent to the public house – its only facility.
2. The proposed BUAB is drawn tightly around the built area of Kingsfold and the density of current development results in no gaps or plots of land being available for development.
3. A large percentage of Kingsfold's dwellings do not have a gas supply or mains sewerage, relying on expensive oil and sewage treatment plants instead.
4. Kingsfold lies close to Gatwick's flight paths which results in penetrating plane noise and environmental impact which discourage many families wanting to live in Kingsfold.

Despite its unsustainable location potential developers will interpret the BUAB as HDC now regarding Kingsfold as sustainable and hence providing scope for larger scale development on the periphery of the BUAB which HDC may have difficulty in defending.

Kingsfold Residents Association contacted their members by email, 61.5% of households replied (as at 10<sup>th</sup> May) with a resounding 100% confirming they were not in favour of the Secondary Settlement designation, and that Kingsfold should remain unclassified based on a mix of the reasons listed above.

Warnham Parish Council and Kingsfold Residents Association therefore request that Kingsfold be removed from the schedule of potential Secondary Settlements.

**Dated 24<sup>th</sup> May 2018**

**Adopted for submission to HDC at the Parish Council meeting on 22<sup>nd</sup> May 2018.**

**Warnham Parish Council**