

ASHINGTON PARISH COUNCIL

REPRESENTATIONS TO THE HORSHAM LOCAL PLAN REVIEW REGULATION 18 CONSULTATION

MARCH 2020

Executive Summary

- i. Ashington Parish Council OBJECTS to the Horsham Local Plan Regulation 18 Consultation Draft. The Plan is not sound for the following reasons:
 - It is not justified because it has not been based on proportionate evidence (particularly relating to matters such as infrastructure and viability) and has not put in place an appropriate process to consider reasonable alternatives, i.e. the interim Sustainability Appraisal is flawed.
 - It is not effective because it has not been demonstrated that the proposed strategy is deliverable.
 - It is not consistent with national policy because it fails to take into account the UK's legal obligations to meet the requirements of the Paris Agreement and its legally binding requirement to reach net zero carbon by 2050.
- ii. The scale of growth proposed for Ashington greatly exceeds any other Medium Village and is inconsistent with the settlement hierarchy. Ashington lacks the infrastructure – particularly public transport and retail services – to support such a scale of growth in a sustainable way. Indeed, the limitations of the current public transport service for Ashington means that commuters are unable to get to and from work in the main employment centres, based on typical working hours. The sustainability of Ashington as a location for growth is further weakened by the absence of any allocations for employment growth in or close to the village.
- iii. Ashington will continue to be a car-dominated commuter village that will reduce the overall sustainability of Horsham as a district, rather than enhance it.
- iv. Generally, the Plan lacks sufficient evidence to justify its preferred strategy – it has not demonstrated what infrastructure is needed to support growth, nor whether growth at the preferred sites is viable or deliverable.

Introduction

1. These representations have been prepared by Navigus Planning on behalf of Ashington Parish Council ('the Parish Council') in respect of the Horsham District Council (HDC) Local Plan Regulation 18 Consultation ('the Reg 18 Plan').
2. We have sought where possible to respond to the questions identified in the consultation. However, for the emerging Local Plan to pass examination, it must demonstrate that it is sound. In this regard, we have also made other equally important points which address this test of soundness and the requirement for a plan to be positively prepared, justified, effective and consistent with national policy.
3. The most fundamental concern is that the Reg 18 Plan and its accompanying Interim Sustainability Appraisal (SA), have not taken into account the Paris Agreement 2015 and the Government's responsibilities as a signatory to it. In this context, this means interpreting the National Planning Policy Framework (NPPF) and its definition of sustainable development appropriately and in line with the requirement of the Paris Agreement to "promote the mitigation of greenhouse gas emissions whilst fostering sustainable development" (Article 6(4)(a)). The Reg 18 Plan makes reference in paragraph 2.12 to the approval of a Council motion to "actively contribute to achieving a net zero carbon target through our activities". Whilst the issue is therefore recognised by HDC, its Reg 18 Plan manifestly fails to demonstrate commitment towards that corporate goal.
4. The Interim SA of Smaller Sites, in its detailed sustainability context (Appendix B) fails to list the Paris Agreement as one of the international policy documents to which it has had regard. It also does not identify, under the national policy context, the passing of the law in June 2019 for the UK to bring all greenhouse gas emissions to net zero by 2050. In this regard, it fails to meaningfully assess how the preferred strategy will address Horsham district's contribution towards meeting the requirements of the Paris Agreement and the Government net zero carbon 2050 target and therefore contribute towards achieving sustainable development, as defined in the NPPF.
5. For this reason, the Parish Council OBJECTS to the Reg 18 Plan because it has not been prepared in accordance with legal and procedural requirements and has not been justified as an appropriate strategy.

Chapter 3 Spatial Objectives

Do you agree with the spatial context - is there anything else we should add?

6. These are two separate questions. Whilst the Parish Council does not disagree with the spatial context, the vision for Horsham district and the detail beneath it must be supported by the policies that articulate this. The Parish Council would support this vision if the remainder of the Reg 18 Plan and its spatial strategy provided a framework to realise that vision. It does not do this and these representations will explain why we believe this to be the case. In particular, the Parish Council considers that, in light of the growth that the Reg 18 Plan is required to support, the vision has not been realised in respect of the following matters:
 - a. Economy: The vision states that the strategy will provide jobs that “offer the opportunity of working closer to home.” In respect of Ashington, a major housing growth location, the Reg 18 Plan fails to do this.
 - b. Housing: The vision states that housing will be delivered “that is supported by community facilities and services.” In Ashington, there is no evidence that the scale of growth will be supported by the delivery of appropriate facilities and services.
 - c. Environmental Quality and Climate Change: The vision states that “Development will be adaptable to the impact of climate change and will mitigate these effects.” In meeting our obligations under the Paris Agreement 2015, development cannot only ‘mitigate’ the effects of climate change; it must reduce the contribution made to it. Therefore the vision and the plan that supports it is in conflict with the Paris Agreement.
 - d. Transport Infrastructure: The vision states that “Opportunities for non-car based transport including walking, cycling and community transport services will be prioritised to help reduce the reliance on private vehicles” and that “The transport infrastructure, especially public transport, is continually improved to offer a high quality, reliable and frequent service and communication facilities are developed to support a sustainable, resilient economy, including opportunities for people to live close to where they work.” The strategy for growth in Ashington provides no support for improvements to public transport and the lack of jobs proposed by the strategy mean that local residents cannot live closer to where they work. This lack of sustainable movement is acknowledged by the Interim SA.
 - e. Community Services and Facilities: The vision states that “There will be significant investment in the leisure offer and community facilities to provide choice for all.” There is no evidence that any specific improvements will be made to support growth in Ashington. Given the lack of existing facilities, it is considered that substantial improvements are required in Ashington. In the absence of any detail, it is therefore not possible to determine whether the Plan is deliverable.

7. The one specific reference that is missing relates to the section on Environmental Quality and Climate Change. This should state that by 2036 Horsham District will have made a meaningful contribution towards the target of net zero greenhouse gas emissions by 2050. The fact is that growth of housing, employment, travel and other activities will create further greenhouse gas emissions, even with the most effective carbon minimisation strategy. The vision must

recognise this and then state how the emissions from this low carbon approach will be minimised and offset by positive action.

Do you agree with the Objectives for the new Local Plan?

8. In order to embed the need to actively contribute towards the UK requirement for net zero greenhouse gas emissions by 2050, a number of the objectives need to recognise this more explicitly. If objectives are to be effective then they must be clear about what the plan is wanting to do; using words such as ‘correct balance’ mean that objectives fail in this regard.
9. The Parish Council suggests the following amendments to the objectives in order to properly recognise this fundamentally important requirement:

Objective	Proposed amendment (text for deletion struck through , new text <u>underlined</u>)
1	Ensure that future development in the District is based on sustainable development principles that strike the correct balance between and <u>actively addresses</u> economic, social and environmental priorities <u>and obligations to</u> and deliver thriving communities with a strong sense of place.
2	To meet employment needs and create opportunities to foster <u>predominantly low carbon</u> economic growth and regeneration, providing high-quality jobs that maintain high employment levels in the District and help reduce commuting distances and facilitate and promote innovation in business (<u>particularly relating to low carbon activity</u>) with support for technological upgrades and change, including full-fibre broadband.
10	Ensure that new development minimises carbon emissions <u>so that Horsham district makes a meaningful contribution towards the UK legal requirement to be net zero carbon by 2050</u> , adapts to the likely changes in the future climate and promotes <u>delivers</u> the supply of renewable, low carbon and decentralised energy.

Are there any others which you would suggest?

10. There is no objective relating to transport which is a clear omission. The Parish Council suggests the following wording for such an objective:
‘Minimise the need to travel by private car through the delivery of meaningful improvements to public transport networks, particularly buses, by focusing housing and employment growth in close proximity to one another and by delivering high quality dedicated walking and cycling routes.’

Chapter 5 Economic Development

Do you agree with the draft policies in this section?

11. The Parish Council does not object to the policies in this section. However, it wishes to highlight the statement made at the start of the section that 'New strategic-scale development will need to help provide local employment opportunities for new residents.' The Parish Council considers that there is no justification for the threshold of 800 dwellings to define a strategic site (para. 6.29). A strategic allocation is one that is of fundamental importance to the delivery of the overall plan strategy and it is evident that, given the quantum of growth proposed for a settlement the scale of Ashington (a 63% increase in the number of households, compared with 2011), the growth proposed here is of strategic importance. However, the strategy for Ashington does not make any allowance for employment development. This means that the growing working population of Ashington will, like the existing working population, be forced to find employment opportunities well outside the local area. Moreover, they will need, like the existing working population, to travel predominantly by car to access these employment opportunities due to the limited public transport network serving the village. Based on the 2011 Census, 81% of those in Ashington parish in employment travelled to work by car, compared with just 69% for Horsham district as a whole. By contrast, just 1% of Ashington workers travelled by bus.

Chapter 6 Housing Number Options

The work to understand the suitability, sustainability, delivery and infrastructure implications is ongoing and your views on these issues are important to us and will feed in to the options that are taken forward for examination.

12. The Parish Council is of the opinion that it is not possible to provide meaningful input to this question without at least some of the evidence required to underpin the overall spatial strategy. Paragraph 16c of the NPPF states:

“Plans should be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees” (our emphasis).
13. There is no evidence that engagement with the identified categories of consultees has been undertaken. For Ashington, one of the critical concerns which is fundamental to the Parish Council’s objection to the Reg 18 Plan is the lack of evidence to explain what infrastructure is needed to support the growth proposed. In a Medium Village lacking decent public transport, a primary school with a largely full roll and with minimal retail/other services and community facilities, the infrastructure improvements required to deliver truly sustainable growth are substantial. Without any evidence to state what may be required – the Infrastructure Delivery Plan is particularly lacking in this respect – it is not possible to determine whether such growth is deliverable.
14. Ashington Parish Council wishes to make clear that the following matters are of significant concern in respect of infrastructure needs to support the scale of growth on the sites proposed:
 - i. There is no evidence presented to suggest how public transport services will be improved in order to create credible and sustainable alternatives to using the private car.
 - ii. With over 600 dwellings likely to result in approximately 150 new primary school age children (based on a common education authority formula of 25 children per 100 new dwellings, assuming a normal mix of dwelling sizes and types), this is the equivalent of nearly one additional form of entry. It is unclear whether the current primary school is able to expand on its current site.
 - iii. There are no primary healthcare facilities serving the village but it is unclear what the implications of over 1,000 new residents seeking to register with a GP will have on patient numbers at medical practices in Steyning and Storrington.
15. As stated previously, there is no evidence that the interim SA has taken into account the Paris Agreement or the legal commitment by the UK to be net zero carbon by 2050. Therefore the assessment of alternatives is flawed and the consideration of the options as presented should not proceed.

What do you consider to be the challenges to this Council in bringing forward the increase in housing development to meet the Government's unprecedented change in housing growth?

16. The Parish Council is unclear as to the rationale for asking this question. Part of the plan-making process should be to identify the challenges at an early stage. As stated earlier in these representations, paragraph 16c of the NPPF states that 'plans should be shaped by early engagement'. The first engagement that any of the parish councils in Horsham – including those at a very advanced stage of preparing a neighbourhood plan such as Ashington – have had with the process of plan preparation has been through this Regulation 18 consultation. The plan process has therefore failed to meet the requirements of national planning policy.

17. Whatever the housing numbers that the Regulation 19 Plan seeks to deliver, the major challenge will be to ensure that this growth, along with associated growth in employment, represents genuinely sustainable development. This must strike an appropriate balance between delivering social, environmental and economic objectives. Delivery of housing without appropriate supporting infrastructure – particularly social infrastructure such as education, health and community facilities – and without genuine alternatives to travel by private car cannot represent sustainable development. Transport accounts for 25% of UK carbon emissions (and we note paragraph 9.2 of the Reg 18 Plan that in the district this figure is 46%), therefore the Local Plan must demonstrate how it will contribute meaningfully towards reducing this so that the UK can meet its obligations under the Paris Agreement as well as the legal commitment by the UK to be net zero carbon by 2050.

Chapter 6 - Potential Housing Allocation Options

What are your views on the site assessment process, and the potential development sites that are identified in this and the supporting documentation?

18. There is little materially wrong with the structure of the site assessment process as undertaken thus far. However, significantly more work is required before a site can be considered to represent a sustainable and deliverable option. Our representations explain in more detail why the Parish Council considers that the detailed assessment work undertaken to date is inaccurate.
19. The Parish Council is concerned however with the number and extent of significant errors of fact that have been presented in respect of a number of the site assessments. The specific errors are presented in Appendix A to these representations.
20. Of particular note is the conclusion for all sites in Ashington which is that, 'the area has a reasonable bus service linking the village to Horsham and Brighton.' There can be no reasonable basis for this conclusion - the village has one limited bus service that connects with Horsham, Worthing and Crawley (no. 23), but not Brighton. For a commuter this service is wholly inadequate:
 - In the morning, for a worker needing to arrive at work by 9am there is one bus, that arrives in Horsham before 8am (with the same bus then going on to Crawley and taking 85 minutes).
 - In the evening, a worker looking to return home at 5.30pm to Ashington from Crawley would be unable to get home because the last bus leaves at 5.25pm. From Horsham there would be only one bus (at 6.10pm) that would get them home.
21. For anyone wishing to attend an appointment with their GP, there are no buses serving the nearest surgeries in Steyning or Storrington.
22. It should be noted that the opportunity to connect up with other bus services was previously available via bus stops along the A24 near Ashington village. However, West Sussex County Council has closed these bus stops where there aren't laybys so it is not possible to pick these services up. Therefore, the quality of bus services is reducing rather than improving.
23. Under no circumstances does the Parish Council consider that this represents a 'reasonable' bus service. This assessment must be revisited otherwise it is flawed.

How do you consider these sites would bring forward development that accords with wider sustainable development principles that balances the need for economic growth with social and environmental requirements as identified in the NPPF?

24. The Parish Council does not consider that the sites proposed for allocation in Ashington are capable of representing any of the three elements of sustainable development.

25. First, the 'need for economic growth' will not be provided for by any growth in Ashington because there are no proposals to provide more employment space (either B-class commercial, retail or any other employment-generating uses). All the growth in Ashington will be housing which does not create economic growth.
26. Second, there is no assessment provided of the scale and nature of infrastructure required to support growth of this scale in a Medium Village with very limited existing public transport and retail facilities, limited capacity at its primary school and no primary healthcare facilities. As such, it is not possible to determine whether these sites, without compromising their viability, can deliver the social sustainability or whether they can deliver the economic sustainability that a significantly expanded bus network is needed to facilitate.
27. Third, without an understanding of issues such as the degree to which growth in Ashington will be supported by improvements to public transport, it is not possible to determine the degree to which Ashington will remain a car-led dormitory settlement. This is relevant to environmental sustainability because, as stated previously, 25% of UK carbon emissions (46% in Horsham district) are accounted for by transport. Even if one were to glibly assume that, by the end of the plan period, every single vehicle owned by a household in Ashington was an electric vehicle (a totally unrealistic assumption despite the Government's commitment to phasing petrol and diesel vehicles by 2035), the growth in overall vehicle movements would continue to have a significant impact on air pollution through tyre and brake wear. This would be accompanied by similar increases in emissions along the A24 due to the increased traffic that the focus on growing the Gatwick Diamond coupled with a lack of meaningful investment in public transport along this corridor, will have. A strategy for growth on this scale in Ashington must explicitly include public transport investment in identified routes in order to represent environmental sustainability.

Chapter 6 - Smaller Site Options

Do you agree that smaller scale sites will also be needed to meet the Council's housing requirements?

28. For the reasons that the Parish Council has stated above, it is of the opinion that the interim SA is flawed because it doesn't take into account the UK's legal requirements to reduce carbon emissions. In this regard, it is not possible to state whether the option proposed is a sustainable one when considered properly against reasonable alternatives.
29. We observe that in principle, the inclusion of smaller scale sites help settlements lower down the settlement hierarchy to prosper. However, it is important to consider not only the sites individually but in combination for each settlement. As stated earlier, the Parish Council does not consider that the arbitrary threshold of 800 dwellings for a strategic site has been justified (nor has it been explained). In this regard, when growth of more than 600 dwellings is proposed in a Medium Village, thereby increasing the scale of the settlement by nearly two-thirds, this clearly cannot be considered to represent development on a scale to which this part of the plan can relate. Given their physical relationship and proximity to one another, it would also be highly disingenuous to consider the sites individually. Certain the five sites north of Rectory Lane, whilst ranging from 20 to 140 dwellings individually, cannot reasonably be considered as anything other than a single site with theoretical capacity for approximately 405 dwellings.

Will the approach of allocating land for over 50 homes in the Local Plan help to provide certainty of delivery, particularly in the short to medium term? Should there be a different threshold?

30. The Parish Council is unclear what evidence there is that the specific threshold of 50 dwellings provides 'certainty of delivery'. The Reg 18 Plan is not supported by any evidence on the time periods over which sites of more/less than 50 dwellings have come forward and been completed historically in the district. As a result there is no justification for this threshold.
31. An approach which starts with an arbitrary number of dwellings for allocation is considering the issue from the wrong perspective. Given that the scales of growth proposed on the sites in Ashington, individually and cumulatively, are unlikely to contribute meaningfully towards significant upgrades to key infrastructure, then the starting point should be an understanding of the capacity of the existing infrastructure to support growth in a sustainable manner. In other words, what is the capacity in the schools and medical facilities and is there a public transport network which can support non-car movement? Funding for investment is finite and stretched, therefore an approach which seeks to use existing assets as efficiently as possible would be a more logical and justifiable one.

Do you consider this approach will allow existing neighbourhood plans that are undergoing preparation to be completed and minimise the need for them to undertake

a review in the short term, whilst allowing the opportunity for communities to do this if they wish? Do you have any suggestions for a different approach?

32. The publication of this Reg 18 Plan can provide no certainty to neighbourhood plan groups looking to complete their plans. By its nature, it does not provide certainty about the District Council’s housing numbers. Neighbourhood plan groups would therefore be relying on verbal communication of what the District Council is minded to do; there can be no certainty and the Reg 18 Plan is still a long way from Examination and being able to hold significant weight.
33. The Parish Council wishes to make clear, in the strongest possible terms, its OBJECTION to the approach taken to ‘early engagement’ – as required by the NPPF – by HDC. At no stage until its publication was Ashington Parish Council made aware of the scale of growth proposed in the Reg 18 Plan. This was despite all the work over more than four years on what is a positive and constructive emerging Neighbourhood Plan. Understandably the community is extremely angry about this situation, as are those that have put so much of their own time into preparing the Neighbourhood Plan. In fact, the question of whether this ‘allows’ Ashington to complete its plan is moot; neighbourhood plans cannot legally be prevented from proceeding, provided they meet the Basic Conditions. What it does is make communities such as Ashington question the validity of preparing neighbourhood plans when all the principles of positive, early and ongoing dialogue which they observe fail to be mirrored by the District Council in its local plan approach.

What are your views on the shortlisted sites and the proposed housing number for each settlement?

34. The Parish Council OBJECTS to the proposed housing number of 600 dwelling for Ashington. Whilst the settlement hierarchy provides a necessarily simple framework, Ashington is classified as a Medium Village which recognises that it has ‘a moderate level of services, facilities and community networks, together with some access to public transport’ (quoting from Strategic Policy 2). This description is recognised as accurate by the Parish Council. However, the scale of growth proposed for Ashington is then entirely inconsistent with this description. The levels of growth proposed for each settlement very clearly highlights this imbalance:

Medium Village	Housing growth proposed (dwellings)
Ashington	600
Barns Green	50
Cowfold	75
Rudgwick and Bucks Green	50
Slinfold	0 (although 77 dwellings have been allocated in the made neighbourhood plan)
Thakeham (The Street and High Bar Lane)	50
Warnham	50
West Chiltington West Chiltington Common	25

35. There is no evidence to justify how Ashington – with its moderate level of services and facilities and extremely limited public transport – can support such a high level of growth. Such growth could only be accommodated by raising Ashington up the settlement hierarchy to be a Smaller Town/Larger Village, with the associated requirement to improve services, facilities and public transport.
36. Partridge Green is proposed to be raised up the settlement hierarchy from a Medium Village to a Smaller Town/Larger Village. The implication is that it now has 'good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and/or bus services' (quoting from Strategic Policy 2). Despite this, the Reg 18 Plan proposes to allocate sites for only 200 dwellings in Partridge Green.
37. Indeed, with the exception of Billingshurst where strategic scale growth is proposed, none of the Smaller Towns/Larger Villages, which have better infrastructure networks than Ashington, are proposed for even half the levels of growth proposed in Ashington.
38. Appendix B to these representations identifies a number of issues raised in the Interim SA which highlight how this scale of growth at Ashington is likely to have a detrimental impact on sustainability.
39. There are a number of detailed concerns with specific aspects of the assessment of the sites and these are presented in Appendix A to these representations. Generally, the concerns with the capacity of Ashington to support growth on these sites (or any sites) relate to matters concerning education, health and transport capacity, which we address in detail in our response on infrastructure matters (Chapter 10 in the Reg 18 Plan) later in these representations.
40. Ashington only has one convenience store (Co-op on London Road) where it is possible to undertake convenience shopping. Few local people consider it is of sufficient size to undertake a full weekly shop, therefore to undertake a weekly food shop requires travel to other towns. The time it takes on public transport in each direction to the nearest stores where it is possible to undertake a weekly shop are:

Location	Distance by road	Time on bus (one way)	Direct service?
Storrington (Waitrose)	4 miles	40 mins	No
Pulborough (Sainsbury's)	9 miles	63 mins	No
Broadbridge Heath (Tesco)	11 miles	66 mins	No

41. It is considered that this represents an insufficient level of retail provision to support such growth. Moreover, if the sites north of Rectory Lane were to allocate new retail floorspace to create a new local centre (the sites in the emerging Ashington Neighbourhood Plan are not allocated for new retail space), this would be away from the heart of Ashington village with poor links to it. This would create a significant increase in unsustainable, short distance car trips by residents needing to access those shops.

42. It is also relevant to consider whether the assessment has been applied consistently. In this regard, there is one particular example of a site not proposed for allocation where the commentary in the Site Assessment Report is inconsistent with that for the sites in Ashington which have been proposed. This is site SA693 in Henfield for 600 dwellings. The Site Assessment Report states that "a development of this scale is also likely to significantly increase pressure on existing services and facilities but may not be of such a scale to provide significant upgrades to current services or provide new facilities or road upgrades". Henfield is a 'Smaller Town/Larger Village' therefore higher up the settlement hierarchy than Ashington. It has a medical centre, primary school, post office and a wide range of shops in a defined Main Shopping Area. It is unclear why 600 dwellings in Henfield will put greater pressure on its wider range of current services than 600 dwellings in Ashington would.

Chapter 9 Climate Change and Flooding

Do you agree with the draft policies in this section?

43. The acknowledgement in the supporting text of the extent of the task at hand to meet the legal requirement for the UK to be net zero carbon by 2050 is welcomed. However, this is not supported by the subsequent policy wording of Strategic Policy 37. Whilst paragraph 9.2 notes that carbon emissions in the district have fallen by 32% between 2005 and 2017¹, the extent of reductions required over the plan period will be substantially higher in order to achieve net zero carbon. This must be achieved with the backdrop of a requirement to deliver between 1,000 and 1,400 new dwellings per annum when national planning policy restricts the energy efficiency of dwellings to the equivalent of Code for Sustainable Homes Level 4 when Code Level 6 is zero carbon. Whilst it is accepted that the Reg 18 Local Plan's potential to require a higher standard is restricted, this simply places greater emphasis on other approaches to carbon reduction.
44. In this regard, the Parish Council considers that Strategic Policy 37 is not robust enough in its requirements for development to ensure that significant reductions in carbon emissions are achieved compared with the baseline of 2019.
45. First, the policy must address matters other than residential development. We note that Policy 39 (a non-strategic policy) address commercial development standards, but both should be part of the strategic policy framework. As currently worded, only residential development is expected to contribute towards carbon reduction and this is very much restricted by national policy. It then confuses the basic requirement of new dwellings to meet the requirements of the 2010 Building Regulations with wider actions to address emissions from construction and transport/movement.
46. Second, the policy must be more specific about what is expected in order to address land use matters where reductions in carbon emissions will have most effect, e.g. transport.
47. Third, the language used – "The Council will be supportive of a range of measures..." - is palpably inadequate in ensuring development actively does all it can to reduce carbon emissions.
48. Fourth, Strategic Policy 37 requires development to "...have good accessibility to public transport..." This highlights the flawed approach of proposing high levels of growth in Ashington where public transport is extremely limited. Strategic Policy 37 conflicts with the overall spatial strategy.

¹ This reduction largely mirrors the UK position with the majority of the fall in emissions accounted for by the 'easy wins' of a shift away from coal-fired energy generation and the reduction in domestic manufacturing, with the associated increase in consumption of goods accounted for by imports not included in the UK emissions figures.

49. An additional point is, given that cycling, walking and public transport have been identified in Strategic Policy 37, it is not clear what "...other forms of sustainable transport..." could be.
50. We note that the wording of Strategic Policy 37 is very similar in many respects to that of Reading Local Plan 2019 Policy CC3 (Adaptation to Climate Change). Given that this is one of the more forward-thinking new local plans that has been adopted, we welcome this. However, the Parish Council considers that the wording in Strategic Policy 37 regarding climate change adaptation must pick up some of the items which it has not taken from the Reading Local Plan Policy CC3 in order to provide clearer guidance as to what is expected of development.
51. There are two particular areas where the policy could be improved. The first relates to the use of trees and native planting of adaptable species in order to provide shade and connect habitats. Currently there is reference solely to 'green infrastructure' which is too vague to provide a meaningful policy direction on a matter which development traditionally has rarely addressed meaningfully.
52. The second relates to the insistence on the use of Sustainable Drainage Systems (SuDS). In a strategic policy this is too precise and pre-supposes that alternative solutions which can achieve a better outcome cannot come forward.

If not, what changes would you suggest?

53. The wording of Strategic Policy 37 should be amended as follows:

'Carbon reduction

Development proposals are expected to include measures which explicitly contribute to achieving zero carbon emissions. ~~Major~~ All residential development proposals will be expected to attain at least a 19% reduction of the Dwelling Emission Rate when compared with the 2013 Edition of the 2010 Building Regulations (Part L) (equivalent to the code for sustainable homes level 4). Non-domestic development must meet the requirements of Policy 39. Schemes will be expected to demonstrate how this target will be attained.

For all types of development ~~The Council will be supportive of~~ requires a range of measures to meet the UK's legal requirement to be net zero carbon by 2050 ~~achieve this target~~, including but not limited to:

- 1. Influencing the behaviour of occupants to reduce energy use;*
- 2. Reducing the amount of energy used in construction and operation of new buildings, including through the materials used in construction;*
- 3. The use of decentralised, renewable and low carbon energy supply systems including solar panels and ground source heat pumps;*
- 4. Using patterns of development which reduce the need to travel, encourage walking and cycling and ~~include~~ are supported by excellent public transport services as well as good accessibility to those public transport networks ~~and other forms of sustainable transport~~; and*

5. Incorporating measures that reduce the amount of biodegradable waste sent to landfill.

Climate change adaptation

All major development must demonstrate how it has been designed to adapt to the impacts of climate change and reduce vulnerability, particularly in terms of flood risk, water supply and changes to the District's landscape. Such measures should include:

1. Use of site layout. Wherever possible new buildings should be orientated to maximise the opportunities for both natural heating and ventilation and to reduce the exposure to wind and other elements;

2. Design measures to maximise resistance and resilience to climate change, for example through the use of solar shading, thermal mass, heating and ventilation, green and brown roofs and green walls;

3. Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions;

4. ~~3.~~ All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change ~~Green infrastructure and dual use Sustainable Urban Drainage Systems (SuDS) to help absorb heat, reduce surface water runoff, provide flood storage capacity and assist habitat migration; and~~

5. ~~4.~~ Measures which promote the conservation of water and/or grey water recycling.'

Chapter 10 Infrastructure, Transport and Healthy Communities

Do you agree with the draft policies in this section?

54. The Parish Council strongly agrees with the statement in paragraph 10.4 that Strategic Policy 41 – which concerns infrastructure provision - is “fundamental to the delivery of sustainable development in the District.” Development cannot be sustainable without having the appropriate infrastructure to support it. In this respect, the statement in paragraph 10.2 is an important principle for the approach that should be taken to develop a sustainable strategy for growth - “Development which comes forward cannot solve existing infrastructure problems, but it will be essential that new development which does take place does not create any additional burdens.” It is therefore important that the strategy recognises where existing infrastructure is at capacity or of poor quality. If the scale of growth cannot address this in order to accommodate the additional demands it places on that location, then it should not be part of the strategy.
55. Ashington Parish Council considers that the spatial strategy is flawed in respect of the scale of growth that is proposed for Ashington because it fails to take account of the limited infrastructure capacity and/or quality that is present. There is no evidence to suggest that the scale of growth proposed can even begin to meaningfully address these infrastructure constraints; as such, the scale of growth should be reduced substantially in this location.
56. Strategic Policy 41 states in clause 1 that the, “...release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development, or suitable necessary mitigation arrangement for the improvement of the infrastructure, services and community facilities caused by the development being provided.” The purpose of a spatial strategy in a local plan is to identify, with evidence, precisely which locations are able to be accommodated by the existing local infrastructure or provide improvements. As worded, this policy clause could mean that no development can come forward because none of the identified locations – strategic or smaller sites – are capable of meeting this test. Until more evidence is provided to demonstrate how each site/growth location is able to meet its infrastructure needs, the strategy is not justified.
57. Paragraph 10.4 states, “Studies to determine whether the proposed development will lead to overloading of existing infrastructure may be required to support planning applications.” The Parish Council considers such an approach - which defers elements of the plan making process to planning applications – is not sound. Studies to understand the extent to which existing infrastructure can support growth should be a fundamental part of the local plan evidence base. In this regard, a key document is the Infrastructure Delivery Plan (IDP).
58. Supporting the Parish Council’s concerns about the approach regarding infrastructure provision is the Horsham Draft Infrastructure Delivery Plan (IDP) 2020. The insufficient quality and extent of evidence gathering is demonstrated by its content. For Ashington, the draft infrastructure schedule addresses a number of items. We would make the following

observations about the lack of evidence in respect of the specific needs and strategy for addressing those needs to support growth in Ashington:

- i. Education – the number of places for children by age are presented but under ‘Location’ it states that this is ‘on- or off-site subject to spatial strategy of Local Plan’. The Local Plan gives no understanding as to how or whether such requirements can be accommodated.
- ii. Transport – it identifies bridleway links but no improvements to day-to-day walking routes, cycling or public transport. Walking and cycling route improvements are generally referenced under the emerging Local Cycling and Walking Infrastructure Plan, which is not part of the evidence base.
- iii. Health – contributions towards site-specific improvements yet there are no primary healthcare facilities in Ashington. The nearest GP surgeries are in Steyning and Storrington, neither of which are accessible by public transport.
- iv. Leisure and sports provision – no assessment undertaken of the specific needs arising from growth in Ashington, referencing existing provision. New provision of facilities in the right location in Ashington would address the needs arising from growth but would also serve as an efficient way of addressing existing needs.
- v. Open space and play space – as per leisure and sports provision.

59. The Parish Council therefore does not consider that the evidence underpinning the whole spatial strategy is sufficient to justify that strategy in respect of infrastructure provision. It also considers that clause 1 of Strategic Policy 41 should only be retained once the Reg 18 Plan clearly states what infrastructure is needed to support growth at each strategic site and at each location where provision is made for growth on smaller sites.
60. The Parish Council strongly supports the statement at the start of Strategic Policy 42 that, “There is a commitment to developing an integrated community connected by a sustainable transport system.” As has been explained previously, this is fundamental to the realisation of genuinely sustainable development which contributes towards the UK’s legally binding requirements to make significant and deep cuts to carbon emissions.
61. The Parish Council therefore objects to the subsequent sentence in Strategic Policy 42 which ‘encourages and supports’ development proposals which promote an improved and integrated transport network. The fundamental requirement of a local plan strategy is to set out how the obligations of a local planning authority are to be addressed. In respect of addressing its housing requirements, it does this explicitly and in depth – Strategic Policy 14 states that ‘The Local Plan will make provision for a significant number of homes and associated infrastructure over the plan period’ (our emphasis). It is therefore wholly inconsistent to not do the same in its strategic transport policy. Indeed, as the quote from Strategic Policy 14 states above, the Plan will make provision for infrastructure over the plan period, yet this is not supported by its transport or infrastructure policies.
62. As was noted earlier, the extent of public transport routes serving Ashington at present is extremely limited and, for commuting, totally impractical. For growth of more than 600 new dwellings in Ashington to be sustainable will require significant improvements to bus services,

including identification of which routes are most important for commuters. Without recognition of what improvements are needed and how they will be provided, the growth proposed does not represent sustainable development.

63. In respect of the scale of housing growth at Ashington, coupled with the absence of any planning for employment growth locally, the Parish Council objects to the following elements of Strategic Policy 42 or the way it has then been interpreted in the spatial strategy:
- i. '2. Minimises the distance people need to travel...' – with no additional local employment opportunities locally, growth of the scale proposed for Ashington will be in conflict with this policy.
 - ii. '4. Includes opportunities for sustainable transport which reduce the need for major infrastructure and cut carbon emissions' – it is unclear what 'opportunities for sustainable transport' are. Sustainable transport means specific improvements to walking, cycling and public transport; an 'opportunity' for sustainable transport does not mean its actual provision. For Ashington, no proposals to improve sustainable transport are identified apart from two bridleway improvements in the Draft IDP.
 - iii. '5. Delivers better local bus and rail services...' –improving public transport to serve Ashington is fundamental if growth proposed there is to be sustainable. This provides no evidence that there is any prospect of improvements to existing services.
 - iv. '6. Develops innovative and adaptable approaches to public transport in the rural areas of the District' – for Ashington this is important because key services such as GP surgeries are in nearby villages that are not currently served by public transport from Ashington. However, there is no clarity as what these innovations could be and how they would specifically help particular communities such as Ashington.

If not, what changes would you suggest?

64. The wording of Strategic Policy 42 should be amended as follows:

'In order to reduce carbon emissions and ensure development is sustainable, ~~t~~There is a ~~commitment~~ need to developing an integrated community connected by a sustainable transport system. In order to maximise ~~manage~~ the anticipated growth in demand for regular use of sustainable modes of travel and movement, development proposals must improve the quality and integration of the ~~which promote an improved and integrated~~ transport network, ~~with~~ specifically through a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities, ~~will be encouraged and supported.~~

Development ~~must~~ will be supported if it:

- 1. Provides safe and suitable access for all vehicles, pedestrians, cyclists, horse riders, public transport and the delivery of goods.*
- 2. Minimises the distance people need to travel and minimises conflicts between traffic, cyclists and pedestrians.*

3. Prioritises and provides safe and accessible walking and cycling routes and ~~is~~ be integrated with the wider network of routes, including public rights of way and cycle paths.

4. ~~Includes opportunities for sustainable transport which reduce the need for major infrastructure and cut carbon emissions.~~

4.5. Delivers better local bus and rail services in partnership with operators and increasing opportunities for interchange between the public transport network and all other modes of transport. The following specific routes are a priority for improvement:

i. [List specific priority routes]

5.6. Develops innovative and adaptable approaches to public transport in the rural areas of the District. The following specific schemes should be provided as a priority:

i. [List specific priority schemes]

6.7. Maintains and improves the existing transport system (pedestrian, cycle, rail and road).

7.8. ~~Is~~ Be accompanied by an agreed Green Travel Plan where it is necessary to minimise a potentially significant impact of the development of the wider area, or as a result of needing to address an existing local traffic problem.'

Conclusions

65. In conclusion, the Parish Council OBJECTS to the Reg 18 Local Plan. It does not consider that it has met the requirements of the NPPF in respect of being prepared in accordance with legal and procedural requirements because it fails to take into account the UK's legal obligations to meet the requirements of the Paris Agreement and its legally binding requirement to reach net zero carbon by 2050.

66. The Parish Council also does not consider that it has met the requirements of the NPPF regarding the soundness of a local plan:
 - i. It is not **justified** because it has not been based on proportionate evidence (particularly relating to matters such as infrastructure and viability) and has not put in place an appropriate process to consider reasonable alternatives, i.e. the interim SA is flawed.
 - ii. It is not **effective** because it has not been demonstrated that the proposed strategy is deliverable.
 - iii. It is not **consistent with national policy** because it fails to take into account the UK's legal obligations to meet the requirements of the Paris Agreement and its legally binding requirement to reach net zero carbon by 2050.

Appendix A – Detailed list of errors in site assessments

SA122

- A1. Significant archaeological remains have been found on the site. Historic England is considering extending the Schedule area because of the significance of the findings and other information it has discovered locally.

SA131

- A2. The conclusion states that, 'the area has a reasonable bus service linking the village to Horsham and Brighton.' This is incorrect - the village has a limited bus service that operates between Worthing and Crawley.

SA548

- A3. The conclusion states that the northern section of the site has been identified for housing in the Neighbourhood Plan. In fact it is the north-eastern section. Assessments of the impact of development on archaeological sites and listed buildings has been undertaken as part of the Neighbourhood Plan evidence base and shows that impacts can be mitigated. The wording of Site Assessment conclusion should be amended to reflect this information.

SA735

- A4. The conclusion states that, 'the area has a reasonable bus service linking the village to Horsham and Brighton.' This is incorrect - the village has a limited bus service that operates between Worthing and Crawley.

SA085

- A5. Ashington School (Rectory Lane) has been identified as a Local Heritage Asset within the Ashington Neighbourhood Plan and the importance of its setting should be reflected. The School and playground are an important community asset. The conclusion states that, 'the area has a reasonable bus service linking the village to Horsham and Brighton.' This is incorrect - the village has a limited bus service that operates between Worthing and Crawley.

SA520

- A6. The bus information in the 'Proximity to Services and Facilities' is incorrect. The bus timetable can be viewed here:
https://assets.goaheadbus.com/media/cms_page_media/2019/3/19/BUS_TIMES_APRIL_2019_Route_23_for_website_Proof_1.pdf. The conclusion states that, 'the area has a reasonable bus service linking the village to Horsham and Brighton.' This is incorrect - the village has a limited bus service that operates between Worthing and Crawley.
- A7. The Neighbourhood Plan detailed site assessments show that there are views into the site from the SDNP and from nearby Warminghurst Church.
- A8. Access from site would be on to B2133 (Billingshurst Road) which is very busy with fast moving traffic. The scale of growth likely to create significant issues with safety of vehicles turning onto

B2133 unless a traffic calming scheme was provided along that road to reduce speeds. There is footpath access into the village but it is along the busy B2133 and therefore is not well used. The site is poorly located for access by bike. Proof of the concerns regarding speed of traffic and safety of pedestrians along the B2133 was given in the dismissal of an appeal in February 2020 for a single dwelling along this road (appeal ref: APP/Z3825/W/19/3240276).

- A9. Surface water flooding - Medium risk as 2% to the south of the site has a risk of flooding every 30 years. 34% of the south has a risk of flooding every 100-1,000 years.

SA524

- A10. The conclusion states that, the area has a reasonable bus service linking the village to Horsham and Brighton.' This is incorrect - the village has a limited bus service that operates between Worthing and Crawley.
- A11. The Neighbourhood Plan detailed Site Assessments show that this site is surrounded on three sides by open countryside so development would sit badly in the landscape. Rectory Lane is very narrow at this point so levels of development would need to be low to make access safe.
- A12. Surface water flooding - Medium risk as 3% of the site has surface water flooding issues towards the north. 38% of the site has a risk of flooding every 100- 1,000 years.

SA539

- A13. The conclusion states that, 'the area has a reasonable bus service linking the village to Horsham and Brighton.' This is incorrect - the village has a limited bus service that operates between Worthing and Crawley.
- A14. The Neighbourhood Plan site assessments show that this site: Surface water flooding - Medium Risk. 8.8% of the site has a risk of flooding every 30 years and 30% every 100-1,000 years at the north and west of the site and 100% of the land is grade 3a agricultural land.

SA790

- A15. The conclusion states that 'the area has a reasonable bus service linking the village to Horsham and Brighton.' This is incorrect - the village has a limited bus service that operates between Worthing and Crawley.

Appendix B – Issues raised in Interim Sustainability Appraisal

- B1. Para 2.135 identifies lack of sustainable transport options in Ashington (similarly in para 2.148) but identifies that sustainable transport could improve over long time although ingrained patterns of travel may persist. Para 2.148 recognises that new housing development at Storrington would affect its AQMA but does not mention that Ashington is also dependent on Storrington as a 'hub' for facilities/services lacking in Ashington and housing in Ashington would affect the AQMA as well. At least Storrington residents could walk to Storrington facilities, Ashington residents could not.
- B2. Para 2.167 recognises that services/facilities/transport/employment options are "limited at smaller settlements eg Ashington and carbon emissions will increase if homes put in smaller settlements." The Interim SA therefore acknowledges that this growth proposed in Ashington will increase carbon emission when the overall need is to make significant reductions in emissions.
- B3. Para 4.12 recognises that, "There is a high level of commuting out from Ashington for jobs".
- B4. Para 4.14 recognises that Ashington does have some access to employment areas (Wiston Business Park) but not by foot due to lack of pedestrian routes.
- B5. Para 4.14 states that Ashington has "strong access to existing sustainable transport links, town centres or key employment areas." This is not supported by any evidence. Strong access can only be by car, which is not a sustainable mode of transport.
- B6. Para 4.17 states "Services/facilities in the (neighbourhood) centre are very limited so most journeys will be out of the village." These journeys will inevitably be by car.
- B7. Para 4.20 is incorrect - Ashington does NOT have any healthcare facilities. The nearest are Storrington, Steyning and Pulborough and none are accessible using public transport.
- B8. Para 4.37 - development at Ashington will significantly affect the AQMA at Storrington because Ashington residents are reliant upon Storrington as a 'hub' for services/facilities.
- B9. Para 6.153 states that "Ashington is a medium village and meets only some of the day to day needs of its residents. Ashington Cluster sites do not provide access to rail or frequent sustainable transport options." This should be recognised as a significant constraint on growth in Ashington but is not.
- B10. Para 6.165 states that "Ashington cluster provides more limited access to services and facilities (for example a secondary school) as well as sustainable transport links". This should be recognised as a significant constraint on growth in Ashington but is not.
- B11. Para 6.172 states that Ashington is "likely to perform less favourably in terms of helping to promote modal shift in the District considering that this settlement has a more moderate service offer and does not benefit from frequent bus services or rail links. Providing new growth at this location may therefore lead to residents being required to travel by private vehicle on a more regular basis which is likely to have impacts in terms of air quality in the

wider area." This should be recognised as a significant constraint on growth in Ashington but is not.

- B12. Para 6.179 states that the Ashington cluster "does not provide immediate access to sustainable transport links or stronger service provisions. This element of growth could have particular implications for the promotion of sustainable travel in Horsham and air quality in relation to this."
- B13. Para 6.184 states that the inclusion of the Ashington cluster site through this scenario may also result in a requirement for new residents to travel regularly by private vehicle from this location."
- B14. Para 6.197 states that the Ashington cluster "is at a settlement which is outside of the higher order towns and villages in the settlement hierarchy. This settlement provides access to some services and facilities (including a primary school) but does not provide access to rail links or bus services more frequent than every 30 minutes." The nearest railway stations are Pulborough (5.2 miles) or Billingshurst (7.2 miles), both have parking limitations and Ashington residents would need to travel there by car as there are no direct bus services from Ashington. The nearest railway station accessible by bus is Horsham (9.8 miles away) but bus services are not frequent and journey times are long. The bus service operates infrequently between Crawley and Worthing, it does not operate to Gatwick or Brighton.
- B15. Para 6.209 notes that the "site at Ashington could result in increased need to travel."
- B16. Para 6.212 states that "Focusing growth at larger urban extensions will likely secure contributions to support the delivery of new infrastructure including sustainable transport links and renewable energy." The fact that the Ashington cluster is not a 'larger urban extension' therefore reduces the prospects of such improvements.
- B17. Paras 6.234 and 6.261 note that "Ashington is not well related to larger settlements."
- B18. Para 6.247 states that "Ashington does not contain a key employment area, although one is located in close proximity to the south." However, this employment site is not accessible using sustainable transport options and is wholly reliant upon access by private car. This was confirmed by the rejection in the Employment Assessment Outcomes document of site SA817.