

Coldwaltham Meadow Conservation Group

Matter 4: Overall Housing Need and Supply

This position statement reflects our original representations identified as 2440, 2442 and 2452.

Matter 4c

1. We question whether housing site allocations in the Local Plan are justified by robust evidence and selection methodology. This is based upon our scrutiny of evidence presented in the SDNPA's 2016 SHLAA and in the corresponding SDNPA Sustainability Appraisal of it.

2. We discovered that Allocation Policies HO008, HO010 and HO015, all featured in the 2016 SHLAA, have not been consistently regarded by SDNPA. Policies HO008 and HO010 appear in Appendix E to the SHLAA as rejected sites. These Policies were both rejected because *"Development on the site would have a potential adverse impact on the character and appearance of the landscape..."* Both sites were deemed to be of Medium/High Landscape Sensitivity. Policy HO015 features in Appendix D of the 2016 SHLAA as an accepted site, even though it was considered to be of *"High sensitivity due to the elevation of the northern extent of the site"*.

3. According to *"Table 3.8: Landscape sensitivity assessment criteria for SHLAA sites"*, as featured in the SDNPA SA, landscapes that are considered to be of High Sensitivity *"...are highly vulnerable to development. Development on the site would have a potential adverse impact on the character and appearance of the landscape..."* On this basis, Policy HO015 should also have been rejected. Instead, it was subject to a Preferred Options Consultation and then withdrawn, following a number of environmental objections.

4. Allocation Policy SD64 did not feature in the SHLAA, but came forward in March 2017, with a major amendment in June 2017, nearly two years after the Preferred Options Consultation had ended. Policy SD64 is not justified by the SHLAA. However, Policy SD64 is located in a different part of the site that was proposed for Policy HO015. It is located in the northern part of the site, described in the SHLAA as being of *"High Sensitivity"*. On this basis, had Policy SD64 featured in the SHLAA, it should have been considered unsuitable and rejected, along with HO008 and HO010 and eventually, HO015.

5. If the "Call for Sites" process had been more transparent and widely known, then the SDNPA would have been made aware of other more suitable sites available for development in Coldwaltham, including those that were offered by local landowners in response to our Group's opposition to Policy SD64. A comparative table featuring these sites, based on SHLAA-derived criteria, was included in our original representations to Core Policy SD1 (Comment ID 2440) and Core Policy SD3 (Comment ID 2442). We would like to talk about this comparative table and map of alternative sites at the hearing.

6. On this basis, we would question that other housing allocations within the Local Plan are justified by robust evidence and selection methodology.

Matter 4d

We do not consider that the distribution and amount of housing sites between settlements in the Local Plan is justified by robust evidence.

7. This is based on our detailed analysis of all the allocations in Chapter 9 of the Local Plan. This table, featured as *“Table 1: Chapter 9 A comparative table of Sites and Settlements from the SDNP Local Plan”* in our original representation 2452, reveals that Policy SD64 is of a disproportionate scale and nature for the size of Coldwaltham that will alter the character of the village. The 30 houses proposed for Policy SD64 will increase the number of dwellings in the village by 12%; an allocation of 6 houses would be more proportionate in scale and would be more in keeping with a village that has a Settlement Facilities Assessment of 2.5.

8. From this analysis it appears that Coldwaltham has been allocated five times more houses than its fair share. This is one of the reasons why Policy SD64 was considered to be a Major Development. *(source: the Maurici opinions referred to in the September 2017 Local Plan 4.19 and Assessment of Site Allocations against Major Development Considerations – Technical Report (Envision, 2015 and update 2017), referred to in 4.24, p.48 of the September 2017 Local Plan. (Other reasons for considering Policy SD64 to be a major development were the potentially significant adverse impacts on the landscape and on the biodiversity of the adjacent SPA/SAC/Ramsar site).*

9. The quantum of houses proposed for Policy SD64 is not related to local housing need, for there is no current evidence of anything other than a minor amount of local housing need for Coldwaltham, as indicated by *Appendix E to Assessment of Site Allocations against Major Development Considerations (Envision 2015, updated September 2017): “The housing register currently shows only 59 households seeking rented units in Coldwaltham. However current data only suggests 3 to have a local connection and hence constitute local need...The nearby sites at Silverdale, will meet immediate housing need, and is under construction.”*

10. There is also no evidence of unmet housing need for the two other villages in the Horsham District Council part of the National Park. Two of the three villages, Washington and Amberley, are delivering their own local housing need via Neighbourhood Development Plans and the third village is Coldwaltham, which unfortunately does not have a Neighbourhood Development Plan.

11. There is no evidence of unmet housing need in any other part of Horsham District Council (HDC). According to HDC’s SHELAA 2016: *“...all SHELAA sites within the NP boundary were excluded from the Horsham District Council SHLAA”* and that, with respect to the rest of Horsham District Council: *“Considering the information given above, the potential supply of identified sites considered ‘deliverable’ (1-5 years) and ‘developable’ (6-10 years), together with a windfall allowance of 50 units per annum is 9,845 units, which is more than sufficient to meet a ten year supply of housing sites as required through the NPPF.”*

On this basis, we consider that the distribution and amount of housing sites between settlements put forward in the Local Plan is unjustified by robust evidence.