

# Transcript of in-person representation made by Andrew Griffith MP, Arundel and South Downs

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Planning Inspectorate Hearing – Horsham District Council

Thursday 12<sup>th</sup> December 2024, afternoon session

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First, let me thank everybody for their role in putting this plan together.

It is a substantial piece of work, and I recognize the challenges of plan making against the constraints that we face in this district, as well as changes to the planning framework that are going on around us and the ongoing concerns for water neutrality and nature which protects the important habitats that we have.

I am very concerned by a number of the site allocations made for housing in this plan, and I speak for the communities whom I represent in the south of the Horsham District. Storrington, Pulborough, Henfield, Ashington, West Chiltington, Thakeham and Small Dole - all of those have strategic sites identified.

My constituents - I've been the Member of Parliament now for five years - have experienced the impact at the sharp end of inappropriate housing developments previously approved by this Council. They are universally not NIMBYs. Indeed, all of them have developed and worked on neighbourhood plans, providing housing growth for their community and the type of housing that delivers for them.

But we have seen a substantial amount of housing, far more than our fair share. It's concreted over much of our green fields and our land is particularly flood prone so that has resulted in significant amounts of flooding because of past development of homes roads and footpaths.

One example of this right now I'm dealing with is in Thakeham where a new housing development approved by this council - a very significant scale of development - is already causing, midway through its construction, significant floods, cutting off footpaths to local communities and has forced existing residents to take additional flood defence measures. My point is that flood plains and a very high-water table - which is a feature of our geography that will not change - needs much greater consideration together with the cumulative, the compounding, impact of the scale of multiple developments that we see in a particular area.

You'll be aware Mr. Fleming, from reviewing the comments on the plan about the lack of infrastructure to support more housing, of the cancellation of the much-needed A27 bypass. This is the primary east-west route running through West Sussex and its cancelled has created a very significant problem of rat running through South Downs villages and towns even before more housing has been added. I will come back to that, but that's particularly acute in the areas around Storrington and around Pulborough and Steyning which is the main alternative route when the A27 is congested as it usually is.

**So, to be clear, today I am seeking for you Mr Fleming as the inspector to make main modifications to the local plan as is your power, so that the plan, which is not currently sound or compliant with the National Planning Policy Framework can be 'made'.**

I am not against making a plan. It is simply that I am against this particular plan. Notwithstanding the no doubt good endeavours that people have approached it with, it is not one that should be made.

We are dealing with lots of different changes in the national planning policy framework as we speak. I've just arrived from Parliament where we were debating the very latest version of that. I will spare the many experts in this room the details of that, however, it is clear that a continuing thrust under multiple different parties and governments of plan-making is consideration for neighbourhood plans and, at its heart, what this plan does not do is build from the neighbourhood plans that have been put together from local communities. That is something that can be rectified by you at this stage.

We are seeing that the additional housing numbers that have been announced today [by the national government] will put even more burdens on the sort of communities going forward. It is a really terrible day for anybody involved in plan making, because notwithstanding the difficult endeavour of allocating the most scarce resource, which is land - particularly in the southeast of England - this will reduce the local voice, and while some of the developers in the room may, may think that is a good thing, if you actually want development to happen, one has to go with the grain of human nature. And as I say, the communities I represent understand the need for development for their children, for their grandchildren, the communities are themselves product of organic growth over in many cases centuries.

I'd like to speak primarily in respect of sites HA17, HA18 and HA21. Those are all areas in which case in which I consider the current plan to be particularly unsound and capable of remediation. They relate to communities I represent in Storrington, Steyning and West Chiltington, all of whom have had significant development already. However, most of the arguments I make apply equally to the other strategic allocation sites in the south, including Thakeham and Henfield, Pulborough and Ashington.

Rather than go through the detail which I know you do not have time for, I'd like to associate myself fully with the submissions that were made in respect to the consultation at the Regulation 19 document from the Parish Councils and residents of those communities, I support and associate myself with those comments rather than repeating them for everybody here today.

The core area of non-compliance is in the fact that these allocations do not achieve or create sustainable communities. That, which you will know Mr. Fleming, is at the core of all of the National Planning Policy Frameworks.

There is an inadequacy of transport, particularly if we ever turned our mind to public transport, where I invite you as part of your, process to seek to visit some of these communities. You'll have to do that with a great deal of planning - perhaps the many HDC officers here can help explain to you that in some of these communities, there is a bus that arrives one day and then leaves on another. So, please, you're most welcome to come along, you may have to make provision to stay for the night because many of these communities are not served by a daily bus.

There is an inadequacy of sewage infrastructure too. I hope, both as an exercise within your inquiry and what you hear from others, you will understand the very significant amount of problems from sewage that includes communities that are enduring 24/7 pumped, off site sewage treatment. That means a tanker parked in the middle of the village or town with its engine running, pumping from the main sewage system, driving that sewage off site for processing because of the inadequacy of sewage.

A failure to consider the impact on that natural environment, habitats, biodiversity, and much more - all of the other measures of what makes for sustainable communities. I'm not going to list all of those, you'll be pleased to hear, but they have been faithfully captured. You will find all of them in the Summary of Representations document. And again, I think that deserves very careful study and addressing as part of our plan making process. In general, the level of development given the scale of the communities and the lack of the infrastructure that is available to those communities is completely inappropriate.

I'll give you an example, to bring this to life. The site known as 'Land north of Melton Drive' in Storrington together with the 'Land at Rock Road' it forms policy HA 19 for a combined total in this small already congested community of 125 homes. The Melton Drive site has come forward for planning consideration to this council on several occasions, and every single time it has rightly been rejected.

I'm seeking for you to remove that planning application in its entirety. It does not have local consent, does not meet local planning criteria, it's on greenfield land, and it goes against the locally made plans and policies. The access from Fryern Road will generate significant additional traffic, putting more pressure on local infrastructure which already suffers from a high volume of traffic, and almost uniquely in West Sussex, it is already an air pollution monitoring point. Significantly part of Fryern Road does not have a uniform pavement for pedestrians. Now I dare say many people here [at the planning inquiry] arrived by train: the wonderful public transport service here that's linked directly to London, and there is a lovely pavement - there are actually two pavements: one on both sides of the road and there are even pedestrian crossings! None of those facilities exist on Fryern Road and it does not have a pavement for pedestrians. and it's very narrow in places.

If you walk down that road on which it is proposed to put 125 extra dwellings, then you will take your life in your hands, and please, for the sake of everybody, I hope that you do not meet one of the inappropriately large HGV vehicles (though it is unlikely to be a bus as we have such poor public transport!) because they're unable to pass side by side.

Residents have rightly highlighted local infrastructure pressures on traffic as well as the impact on the local environment. These relate particularly to the A283 where the traffic is so heavy it queues constantly from Storrington through to Washington and they suffer from the lack of footpaths. It's also an area that suffers from traffic volume and speed.

Another similar site, again, it's on the A283 that I would wish to see removed from the local plan is known as 'Land at Glebe Farm', it forms policy HA17 in Steyning it proposes to put 265 homes on entirely green field always undeveloped that predominantly agricultural land, it drains directly into the River Adur there is no successful remediation for the runoff into the River Adur and it's completely inappropriate, the sewage system in Steyning already cannot cope. The GP surgery is already unable to cope with the existing population of Steyning and we have real problems with school places.

Mr. Fleming, as the local Member of Parliament, one spends a significant proportion of time twice a year, dealing with the challenges of parents trying to get their children into school. This is not a South London exercise in parental choice between six or seven easily commutable schools. The reality is, most parents in West Sussex are lucky if they can obtain a place at one school, and then encounter the very significant logistical challenges - if you live in a rural community - of how your children will get to school. All of our secondary schools are overflowing and most of our primary schools are overflowing. There is no capacity for these additional 265 homes which could need,

would, could result in 1,000 people. The Glebe Farm land regularly floods; it spends a large part - as do many of the areas that I talk about today - a large part of the winter months with the water table at surface level. Any inundation on top of that results in surface water run-off onto the roads which themselves don't have successful drainage attached to them so flood as well. That produces an enormous amount of runoff which inundates storm water sewers and flows straight into the River Adur. The River Adur - which I hope you'll take evidence on - is itself under real challenges in terms of the water quality.

Steyping is one of those communities that suffers from sludge sewage. That is to say untreated sewage being extracted from the inappropriate, unsustainable, lack-of-capacity sewage system and being tankered away.

There are significant issues with local transport most of these sites that I talk about.

Whilst they are not in the South Downs National Park - you will know that's a separate planning authority - all are visible from parts of the South Downs National Park. That is a Dark Skies Protected Reserve of national importance - the only one in the southeastern England, and all of this development would have significant deleterious impacts on that. And then others will talk about the huge array of bird and mammal species, around a quarter of which are red list endangered species that would be impacted, particularly around some of these sites like Glebe Farm.

Policy HA 21 proposes 15 houses on land in Smock Alley in West Chiltington. This is another example of a site which has been repeatedly refused planning on a number of previous attempts. Most recently just this April that went to appeal even the planning inspector dismissed that that is wholly inappropriate. For some inexplicable reason it is being brought back to the council yet again what one can only speculate as to exactly what is going on there, it has no merit as a site, it should not be built on. The Council should not be making any form of premature determination as a point of legal process, that would be entirely wrong. It should be considered within the framework of this local planning review that is the appropriate forum in which, to do that the Council should not be preceding with that, and you can consider that, Mr. Fleming, as part of your considerations as to you think, whether you think that is a site that is sustainable.

I would contend it is not! It is a location that is entirely dependent on car use, and it is on a site that has been proven to be rich in natural habitats. It is outside the built-up boundary area and as I say, even a planning inspector previously determined it has no relationship to the adjoining settlement. Needless to say, that has attracted a very significant strength of local feeling, with over a thousand local residents not just concerned about the planning outcome itself, but severely concerned about the conduct of Horsham District Council and its leadership in that matter.

In general, the very significant number of representations you have had by residents against this local plan must be given weight in order to have a planning system that delivers the homes the nation needs, allows developers to get on with their contribution to society of building those homes that the nation needs but brings communities with us.

It is absolutely imperative that we have trust in the system. That is why I'm here today, that's why you are here today, that's why we're all here today. We have to have a system for making these decisions that we can trust.

If we are to do that, we must open ourselves up to the voice of communities, and we have to create loops whereby people see that if they respond to a consultation - and in many cases they do respond to a consultation in their tens or hundreds or thousands - that something, Mr Fleming therefore

changes. Because if cynically the system barrels on regardless, and it is causing an enormous erosion of trust, it is actually preventing the homes being built that we need to be built.

I will mention very briefly, water neutrality. You have a longer session on that, and I don't have any special subject matter expertise. I do see the difficulties for the natural ecosystem of us living in an area of water stress, of real water scarcity. Experts talk about the fact that the Southeast will be in a position of not having self-sufficiency in water. It's clearly a role for Natural England, for Southern Water, for government infrastructure in terms of trying to solve some of these issues in both the short and the long term, but that does not mean that we should barrel along regardless, and it does not mean that we should try and find workarounds of a short term nature or even the sort of 'ponzi schemes' that we are seeing springing up in this community: people transferring money, making up credits, pretending they're engaging in behaviour that they're not engaging in. I see it all, Mr. Fleming, I see farmers and landowners saying, you know, they'll cease to do something for a couple of years until the council's back is turned and pocketing the money of developers knowing that there is no compliance procedure ever invented that will continue to provide an intrusive inspection regime.

Let me just finally conclude with one point.

Often when I make these sorts of representations - and I am someone who engages in the planning process in a balanced way, makes reasoned arguments, tries to represent the community, but also tries to explain the hard truths to communities and accepts the need for us to have the right way of building our communities organically - one of the ways in which the argument is often couched is we either proceed in this one particular direction at this particular one time or nothing at all happens. That's simply not true.

There are a very significant number of brownfield sites in the Horsham District. The district I believe has over 500 square kilometres, here are very significant amounts of public land, land owned by the NHS, land owned by the national rail company, very significant amounts of brown field land, a very small proportion of which appears on the council's brownfield land register. A very, very productive way forward for all of us will be to do a much better examination and scrutiny of where there are potential brown field sites, where there is potential, even within this district, to go after and build.

You may be familiar, from your studies of the area, about the very large site that lies immediately adjacent to this plan: the former cement works in Shoreham. It is a site that's capable of taking thousands of dwellings, but because of the path of least resistance, of developers coming along to a plan, everyone going through the masquerade, and then seeking the most profitable course of action, which is a simple consent on a piece of greenfield ex agricultural land next to a village, that piece of perfect brownfield, that perfect site, with its easy connectivity to Shoreham with its opportunity to do some wonderful architecture, to build sustainable communities that site has gone undeveloped for 30 plus years. All of the energy and endeavour and the human enterprise of the people in this room has instead gone to finding another quarter acre of an adjacent piece of green field, and no one has lifted their eyes and sought to fully exploit that opportunity.

I know it's beyond your strict scope of contemplation, Mr. Fleming, but we are, of course just minutes - just minutes away on a train - from a huge global conurbation. A conurbation that has 24/7 transport networks, it's got five teaching hospitals, it's got three Premier League football clubs, it's got any number of education facilities from primary to secondary to tertiary and every other level. That is the infrastructure, that's the society where we should be building, and I know it is outside your contemplation, but it is a great pain to me as it is also, I know, to residents across

West Sussex, across Horsham, across the whole of the Southeast, that on a day that we are being told that we must have top down “command and control” housing targets rained upon our heads that the target for London, with all of that wonderful infrastructure, the brownfield sites, opportunities the chance to densify one of the least dense urban cities in Western Europe - is having its housing target reduced.

Mr. Fleming, thank you very much for entertaining my representations on behalf of my constituents. As I have said, I’m largely trying to articulate the detail of the substance that has already been made in representations and urge you to maintain trust in this planning process by using your discretion to make this plan in a better and more sustainable way.

ENDS