



Homes
England

Making homes happen

9th April 2020

Neighbourhood Planning Officer
Horsham District Council
Parkside
Chart Way
North Street
Horsham
RH12 1RL

Dear Sir / Madam,

RUSPER NEIGHBOURHOOD PLAN 2018-2031 REGULATION 16

We set out at Annex A our detailed representations to Rusper Parish Council's Regulation 16 consultation on the Draft Rusper Neighbourhood Plan Submission (the **Draft Neighbourhood Plan**). These have been formatted in accordance with the Rusper Regulation 16 Consultation Comment Form.

These representations are made by Homes England in its role as the Government's housing accelerator, and as a majority landowner and promoter in relation to the strategic growth opportunity that has been identified at Land West of Crawley, which envisages a new Garden Town comprising at least 10,000 new homes.

Purpose of Representations

These representations are made in respect of the Draft Neighbourhood Plan that has been published pursuant to Regulation 16 of The Neighbourhood Planning (General) Regulations 2012, and set out Homes England's position in so far as the Draft Neighbourhood Plan is relevant to Homes England's proposals for a long term strategic growth opportunity that will deliver a minimum of 10,000 new homes at Land West of Crawley.

Homes England has concluded that the Draft Neighbourhood Plan fails to identify the opportunity to bring forward and plan positively for the long-term strategic growth opportunity at Land West of Crawley and therefore fails to meet the basic conditions as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.

Homes England considers that a significant opportunity exists to identify Land West of Crawley as a strategic allocation of 10,000 new homes, supporting infrastructure, employment and community facilities that would collectively comprise a "garden town". Rather than incremental, ad hoc, standalone allocations over time, it is considered that a single allocation now, to meet needs for the long term, is capable of being much more than the sum of its parts. In its role as the

OFFICIAL

Government's housing enabler, Homes England can help facilitate delivery of that wider public benefit.

Consistent with Homes England's vision for the strategic growth opportunity at Land West of Crawley, these representations therefore set out:

- Homes England's objection to the identification of **Character Sub Area SP2 – Between Ifield and Ifieldwood**, and explanation as to why this designation renders Policy RUS1, and the Draft Neighbourhood Plan as a whole unsound.
- The history of the proposals and long published intent for Homes England to bring forward a major strategic allocation/garden town at land West of Crawley, and the expectation that Land West of Crawley will be allocated for new housing as part of the local plan review process, indicating that the Draft Neighbourhood Plan will almost certainly need be reviewed in the near future.
- The value that is offered by development proposals which seek to create a positive relationship with the urban edge at the Land West of Crawley, respect the area's nature conservation and recreation value, and recognise its links to the wider countryside.
- Homes England's support for Land West of Crawley being allocated for 10,000 new homes and why this is an optimal outcome in terms of the overall benefits that can be realised from such an approach.
- The role of Homes England and how it can work in partnership with Horsham District Council and Rusper Parish Council to support housing delivery once the housing target for Horsham District Council is known.

Where necessary, these representations refer to the supporting evidence base published alongside the Draft Neighbourhood Plan.

At this stage, Homes England would like to clarify that it reserves the right to send representatives to be present at the Neighbourhood Plan examination if a public hearing is held. In the meantime, please contact me if you would like to discuss any of the points raised in this submission. I look forward to further engagement and would be grateful if you could continue to keep us informed in relation to the progress of the Draft Neighbourhood Plan and also notify us of the local planning authority's decision under Regulation 19 of the Neighbourhood Plan (General) Regulations 2012.

Yours faithfully,

[Redacted signature]

[Redacted name]

Project Director
Homes England

[Redacted contact information]

Annex A: Homes England Representations on Ruser Neighbourhood Plan 2018-2031 (Regulation 16)

Paragraph Number	Policy Reference	Details of reasons for support/opposition, or other comments	Suggested improvements or modifications
Foreword	N/A	<p>Homes England opposes the following statements included within the foreword.</p> <p><i>"Even small-scale development would lead to the two towns becoming one large urban sprawl"</i></p> <p><i>and.</i></p> <p><i>"Further development, especially to the West of Ifield, will be harmful to both the communities and the environment".</i></p> <p>Homes England reiterates (as set out under its Regulation 14 representation) that if a separation of 2km (more than a mile) between the two settlements is maintained, national design principles are followed and existing land ownership restrictions are taken into account, these statements cannot be justified.</p> <p>Both assertions present a subjective viewpoint, are misleading and are not based on evidence. The statements would directly contradict the direction of the emerging Horsham District Local Plan 2019 – 2036</p>	<p>Homes England considers that the following statements should be removed in their entirety as they cannot be justified and not are based on objective evidence.</p> <p>"Even small scale development would lead to the two towns becoming one large urban sprawl" and; "Further development, especially to the West of Ifield, will be harmful to both the communities and the environment";</p> <p>These amendments are necessary to ensure that the plan meets the basic conditions, is consistent with emerging local plan policy, and promotes the principles of sustainable development.</p>
2.3 – 2.4	N/A	<p>Homes England does not consider this paragraph sufficiently outlines committed and</p>	<p>Homes England recommends that the following amendments are made to Paragraph 2.3.</p>

Paragraph Number	Policy Reference	Details of reasons for support/opposition, or other comments	Suggested improvements or modifications
		<p>potential future development proposals.</p> <p>Given Homes England's previous representation on the Regulation 14 draft Neighbourhood Plan, and Homes England's well developed proposals to bring forward a strategic growth opportunity at Land West of Crawley, Homes England considers that paragraph 2.3 should include reference to Land West of Crawley (as identified under the Regulation 18 Draft Horsham District Local Plan 2019 – 2036) and the expectation that Land West of Crawley will be allocated for housing development.</p> <p>The assertion that new development will put 'huge strain' on the Rusper Neighbourhood Plan area is not supported by any evidence base. Indeed, the text itself goes on to acknowledge that <i>"the proximity to these urban areas does mean that the needs of residents can be met relatively easily"</i>.</p>	<p>"While Rusper has been the least populated parish in the area, in the next ten years its population is likely to double. The major housing allocations at North Horsham and Kilnwood Vale along the A264, along with <u>the potential for further Strategic Allocations at 'Land West of Crawley' as being considered under the Regulation 18 Draft Horsham District Local Plan 2019 – 2036 will all increase population if and when delivered.</u> Other developments proposed include an incinerator to the west at the former Wealden Brickworks, Langhurstwood Road, the proposed expansion at Gatwick and the knowledge that Crawley will reach its capacity to expand in the next 15 years. all put a huge strain on the Rusper Neighbourhood Plan area. Proximity to these urban areas does, however, mean that the needs of residents can be met relatively easily.</p> <p>These amendments are necessary to ensure that the plan meets the basic conditions, is consistent with emerging local plan policy and promotes the principles of sustainable development.</p>
3.8	N/A	Homes England records that this paragraph reflects an outdated position and should be updated.	<p>Homes England recommend that the following amendments are made to Paragraph 3.8:</p> <p>This has further been evidenced in the recent publication of the Crawley Borough Local Plan 2020-2035 <u>Regulation 19 Submission Draft June 2019</u> version, which <u>under Policy H3g urban extensions notes that 'Housing development through urban extensions on or close to Crawley's administrative borough boundaries will be supported by Crawley Borough</u></p>

Paragraph Number	Policy Reference	Details of reasons for support/opposition, or other comments	Suggested improvements or modifications
			<u>Council where it can be shown that they meet listed criteria.</u>
3.10	N/A	<p>Homes England opposes the broad sweeping statements made in this paragraph as they do not reflect the policy position of Crawley Borough Council.</p> <p>It cannot be stated that Homes England's plans are opposed by Crawley Borough Council with the Submission Consultation Draft of the Crawley Borough Local Plan 2020 – 2035 (January 2020). Draft policy H3g of the emerging Crawley Borough Local Plan 2020 – 2035 provides that <i>Housing development through urban extensions on or close to Crawley's administrative borough boundaries will be supported by CBC where it can be shown that they meet listed criteria.</i> There are no policies within the emerging Crawley Borough Council local plan that are at odds with Homes England's proposals.</p>	<p>Homes England recommends that the following amendments are made to Paragraph 3.10 with the removal of the last two sentences:</p> <p>In addition, Homes England has recently published a consultation seeking views on a new sustainable community on land to the west of Ifield as part of the HDPF Review (see https://www.gov.uk/government/consultations/west-of-ifield). These plans are currently opposed by Crawley Borough Council and against the recommendations of the Horsham District Council 2018 SHELAA. All opinion voiced with regard the earlier draft Rusper Neighbourhood Plan was against this development and it is contrary to most of the policies in this plan.</p> <p>These amendments are necessary to ensure that the Plan meets the basic conditions to be consistent with emerging Local Plan policy.</p>
3.20 / Plan C: HDC 2018 SHELAA Map	N/A	Homes England records that this paragraph reflects an outdated position and should be updated to be consistent with the Regulation 18 Draft Horsham District Local Plan 2019 – 2036, reflecting the allocations being proposed by HDC.	<p>Homes England recommends that the following amendments are made to Paragraph 3.20 with an associated update to Plan C.</p> <p>The HDC 2018 SHELAA Map Plan C, the drawing shown below, indicates those areas being considered for housing allocation under the Horsham District Council Regulation 18 Plan where they relate to the RNP area.</p>

Paragraph Number	Policy Reference	Details of reasons for support/opposition, or other comments	Suggested improvements or modifications
		<p>It is incorrect to state that this plan 'highlights pressures on the Rusper Neighbourhood Plan area'. The plan can only be deemed to show the location of current and potential housing allocations.</p>	<p>highlights the pressures on the Rusper Neighbourhood Plan area. Areas in green represent already approved future development. Areas in red indicate those not suitable for development. The red areas to SA101 and SA291 the west of Ifield (on the right of the map below), cover most, but not all, of are part of the area proposed by Homes England for a new Garden Town. 10,000 houses.</p> <p>These amendments are necessary to ensure that the Plan meets the basic conditions to be consistent with emerging local plan policy, and promotes the principles of sustainable development.</p>
5.3	N/A	<p>As identified under Regulation 14 Representations, Homes England does not consider that the vision and objectives adequately contribute towards the promotion of sustainable development as defined in Paragraph 8 of the NPPF.</p> <p>The commentary in section vi of Paragraph 5.3 regarding the Housing Needs Assessment fails to take account of the duty to cooperate between <u>Horsham District Council</u> and Crawley Borough Council in meeting unmet needs.</p> <p>Homes England recognises that Horsham District Council needs approximately 1000 homes per annum to meet its own objectively assessed need and that Horsham District Council has not yet indicated the extent to which such objectively assessed need should be</p>	<p>Homes England recommend that the following amendments are made to Paragraph 5.3, section v1:</p> <p>The housing provision within the Rusper Neighbourhood Plan area will more than double over the next twenty years, based on already identified developments. It must also be acknowledged that Horsham District Council has a duty to cooperate to accommodate a proportion of Crawley Borough Council's unmet needs within its administrative area. Given that the Housing Needs Assessment is met more than 5 times over by these already permitted developments, any further housing development should only be permitted if it meets some clear community need. This may include improvements to brown field sites and where there is a specific benefit to the Parish.</p> <p>These amendments are necessary to ensure that the Plan meets the basic conditions to be consistent with National Policy, the emerging local plan policy, and promotes the principles of sustainable development.</p>

Paragraph Number	Policy Reference	Details of reasons for support/opposition, or other comments	Suggested improvements or modifications
		<p>met within Crawley's administrative area.</p> <p>The Regulation 18 Draft Horsham District Local Plan 2019 – 2036 does however envisage that the Site has “the potential to deliver a very significant proportion of [Horsham District Council’s] housing requirements”.</p> <p>In addition, Crawley Borough Council is unable to deliver more than about 50% of its current objectively assessed need for housing. Crawley Borough Council currently has a 5,925 shortfall in the Plan period. Horsham District Council is considering options to meet 200 or 400 of that shortfall per annum (or around 3600 or 7200 over the Plan period). The natural location for that is to the west of Crawley.</p> <p>Homes England recommends that section vi. Housing is reviewed, to acknowledge paragraph 72 of the NPPF which confirms that <i>The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.</i></p>	

Paragraph Number	Policy Reference	Details of reasons for support/opposition, or other comments	Suggested improvements or modifications
6.4 – 6.9	Policy RUS1: Spatial Plan	<p>As outlined in response to the Regulation 14 Pre-Submission Plan (August 2019), Homes England considers this policy to be unsound as it is not consistent with national policy or the emerging <u>Horsham District Council</u> and Crawley Borough Council local plans.</p> <p>Homes England’s objection to Policy RUS1 focusses on the identification of the <i>Character Area SP2: Between Ifield and Ifieldwood</i>.</p> <p>SP2: Reason for objection</p> <p>Homes England recognises that landscape capacity varies considerably across the sites being considered for allocation in the Regulation 18 Draft Horsham District Local Plan 2019 – 2036 as evidenced in the recent Landscape Character Assessment contained within the <u>Horsham District Council</u> Landscape Capacity Study 2020.</p> <p>Notably, the <u>Horsham District Council</u> Landscape Capacity Study 2020 demonstrates that Local Landscape Character Area 05 (in which the majority of Character Area SP2 is located) is regarded to have “moderate-to-high capacity for large-scale housing”. The assessment concludes that land in Landscape Character 05 displayed “moderate landscape</p>	<p>Homes England recommends that Policy RUS1 is revised in order to meet the basic conditions and be in accordance with the respective Local Plan reviews of both Crawley Borough Council and Horsham District Council.</p> <p>It is considered that to ensure this, RU 1 Character Sub Area SP2 should be removed from the plan entirely for the reasons given.</p> <p>It is recommended that Policy RUS1 is amended as follows:</p> <p><i>The Neighbourhood Plan defines the built-up area boundary for Rusper, as shown on the Policies Map, for the purpose of applying Policy 4 of the Horsham District Framework.</i></p> <p><i>Development proposals should conserve the open and tranquil character of the intervening landscape and its views at the following location:</i></p> <p style="text-align: center;"><i>SP1: Kilnwood Vale, Crawley and Lambs Green</i></p> <p><i>Proposals which <u>generate negative or harmful urbanising effects</u> either individually or cumulatively, unacceptably harm or detract from the distinct landscape character and separation of these areas, as defined in the Policy Map, will not be supported.</i></p> <p>These amendments are necessary to ensure that the policy meets the basic conditions, and to ensure that the policy accords with the <u>Regulation 18 Draft Horsham District Local Plan 2019 – 2036</u>, and in particular Policy 29: Settlement Coalescence, which “<i>recognises that several proposals have been submitted to the Council for consideration as locations for strategic housing growth. A number of these are in the key locations which have been identified as being most sensitive for their potential for settlement coalescence. Whilst no</i></p>

Paragraph Number	Policy Reference	Details of reasons for support/opposition, or other comments	Suggested improvements or modifications
		<p>sensitivity” and “low-to-moderate landscape value”.</p> <p>Table C of Appendix H – RNP Landscape Character Assessment and Assessment of Local Gaps – provides the rationale for the Character Sub Areas set out in RUS1 and asserts that Character Area SP2 contains no land with planning permission or land that has been allocated for development in the HDPF. This is contradicted by the evidence contained within the <u>Horsham District Council</u> Housing: Site Assessment Report (which forms part of the evidence base that informs the Regulation 18 Draft Horsham District Local Plan 2019 – 2036), which categorises site SA101 – which falls into Character Area SP2 – as having “potential for allocation for housing development”.</p> <p>Character Area SP2 is allocated for new housing within the Regulation 18 Draft Horsham District Local Plan 2019 – 2036 and Homes England has submitted clear representations to confirm its suitability and deliverability for housing.</p> <p>As such, Homes England finds Character Area SP2 to be at odds with the Regulation 18 Draft Horsham District Local Plan 2019 – 2036 and the <u>Horsham District Council</u> Landscape</p>	<p><i>final decisions have been made as to whether these sites should be allocated, the sites are in locations where there has been sustained pressure for development”.</i></p>

Paragraph Number	Policy Reference	Details of reasons for support/opposition, or other comments	Suggested improvements or modifications
		<p>Capacity Study 2020. It is therefore clear that SP2 cannot be justified on any objective, evidence based assessment, and should be removed from policy RUS1.</p> <p>SP1: Comments With regard to Character Area SP1, Homes England does not consider that the Draft Neighbourhood Plan properly takes account of the previous history of development proposals relating to Land West of Ifield, and therefore SP1 could prejudice <u>Horsham District Council's</u> consideration of an area of search for a Garden Town in this location, precluding the opportunity for <u>Horsham District Council</u> and Crawley Borough Council to consider all strategic development opportunities in line with paragraph 72 of the NPPF.</p> <p>Homes England has committed to preparing a landscape-led masterplan to take account of this and considers that the ability to explore a larger scale development at this stage as part of the wider strategic growth opportunity provides the greatest potential to avoid the most sensitive landscape features, and ensure that development is directed towards areas with greatest capacity, with appropriate mitigation being provided at a strategic scale where</p>	

Paragraph Number	Policy Reference	Details of reasons for support/opposition, or other comments	Suggested improvements or modifications
		<p>necessary.</p> <p>In line with the objectives of <u>Regulation 18 Draft Horsham District Local Plan 2019 – 2036</u> Strategic Policy 29, the identification of a long term development area will also assist in identifying appropriate long term, defensible boundaries that fully account for the areas of highest landscape value and support the intentions of RUS1.</p> <p>Without the suggested amendments, important strategic sites that will naturally have an impact upon existing gaps could fall foul of the strategic policy. Homes England considers that the criteria must therefore focus on no negative or harmful impacts arising.</p> <p>It is important that the Draft Neighbourhood Plan policy does not prejudice or frustrate the long-term delivery of sustainable development, especially in relation to larger strategic sites where sustainable development opportunities will be realised over multiple Plan periods.</p> <p>Homes England recognises that there is a commitment to undertake further landscape character assessment to build on the 2003</p>	

Paragraph Number	Policy Reference	Details of reasons for support/opposition, or other comments	Suggested improvements or modifications
		District Landscape Character Assessment, and more recent work contained within the Horsham District Council Landscape Capacity Study 2020 . Once complete, Homes England will be happy to share landscape and character assessment work undertaken to support the proposal for its development.	
	Policy RUS3: Design	<p>As outlined in response to the Regulation 14 Pre-Submission Plan (August 2019), Homes England supports the commitment to high quality design.</p> <p>However, Homes England maintain that the reference in viii. to specific technologies should be deleted and should be replaced with a generic reference to the most suitable and appropriate technologies at that point in time to secure measurable low or zero carbon dioxide emissions.</p>	<p>Homes England recommends that the following amendments are made to RUS3, section viii:</p> <p>Features (including renewable energy) that lead to low or zero carbon dioxide emissions, <u>depending on the most suitable and appropriate technologies available at the time</u> .such as solar panels and air or ground source heat pumps</p> <p>These amendments are necessary to ensure that the plan meets the basic conditions, is consistent with National Policy, is consistent with emerging local plan policy, and promotes the principles of sustainable development.</p>
RUS8, Paragraphs 6.41-6.44	RUS8: Landscape Character and Local Gaps	Consistent with comments made regarding RUS1 Homes England objects to this policy. If adopted it would introduce a restriction on development which could undermine the area of search exercise that Horsham District Council is undertaking through the Regulation 18 Draft Horsham District Local Plan 2019 – 2036.	<p>Homes England recommends that the following amendments are made to RUS8.</p> <p><i>All new development must protect and enhance the character and quality of the Low Weald landscape character area, including the setting of settlements and hamlets within the parish.</i></p> <p><i>The Neighbourhood Plan defines the following Local Gap for the purpose of preventing coalescence of the following settlements:</i></p>

Paragraph Number	Policy Reference	Details of reasons for support/opposition, or other comments	Suggested improvements or modifications
			<p>LG1: Between Rusper Village and Lambs Green</p> <p>Development proposals within the Local Gap should demonstrate how the character of the Low Weald landscape has been taken into consideration and how proposals preserve their separation and retain their individual identities.</p> <p>These amendments are necessary to ensure that the plan meets the basic conditions, is consistent with emerging local plan policy and promotes the principles of sustainable development.</p>
Paragraph 6.38	Policy RUS7: Local Green Spaces	This policy rightly confirms that development on local green spaces should be treated in the same way as development in the green belt, and specific reference is made to paragraph 101 of the NPPF. However, reference should also be made to paragraphs 145 and 146 of the NPPF.	<p>Homes England recommends that the following amendments are made to paragraph 6.36.</p> <p>This policy designates a series of Local Green Spaces in accordance with paragraphs 99 -100 of the NPPF. A designation has the policy effect of the equivalence of the Green Belt when determining planning applications located within a designated Local Green Space. Hence, the policy resists all development proposals that will undermine the essential character of designated areas, unless they are ancillary to the current use of the land, or there are special circumstances in line with NPPF paragraph 101, <u>145</u> and <u>146</u> to justify why consent should be granted.</p> <p>These amendments are necessary to ensure that the plan meets the basic conditions, is consistent with National Policy, and promotes the principles of sustainable development.</p>