



Horsham
District
Council

Horsham District Local Plan Regulation 18 Consultation Report

Draft

July 2021

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1. Introduction

- 1.1 Horsham District Council is preparing a new Local Plan that will be used to guide development in the District between 2021 and 2038. As part of the production of its Local Plan, the Council has undertaken two rounds of consultation on what the Local Plan should contain.
- 1.2 In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (hereafter referred to in this report as 'Regulation 18'), between 6 April and 26 May 2018, the Council consulted on the Issues and Options for Employment, Tourism and Sustainable Rural Development document. A summary of the responses made during the consultation and the proposed next steps have been published online¹.
- 1.3 Between 17 February and 30 March 2020, the Council consulted on a draft version of its Local Plan, also in accordance with Regulation 18. This consultation report provides a summary of the responses received.

Consultation Responses

- 1.4 A total of 6,320 comments were received on the Local Plan consultation made by 3,352 different respondents – reflecting that some that respondents provided multiple different submissions. Respondents included individual residents, representative bodies including Parish Council and community groups, those representing the development industry such as landowners and site promoters, as well as statutory bodies such as the Environment Agency and neighbouring local authorities.
- 1.5 The vast majority of comments were submitted online (around 5,500) through the Council's Inovem web portal, with the remainder relatively evenly split between comments submitted by email and mail.
- 1.6 In addition to comments being sent during the consultation period, letters, emails and petitions were submitted to the Council both prior and subsequent to the consultation. Such comments are not discussed further in this report but regard has been had to them in the preparation of the Local Plan. The comments and issues covered in the petitions and additional correspondence have not raised any new issues that were not raised in this consultation.

Processing Comments

- 1.7 All comments received were initially electronically sorted (known as 'tagging'), classifying the content of the comment against the part or parts of the Local Plan to which they related to and categorised whether it was a support, object or general observation. The process allowed multiple tags – for instance if someone objected to one policy but supported another, the comment was able to be registered against both of the different views.

¹ https://www.horsham.gov.uk/data/assets/pdf_file/0008/70955/Summary-of-Representations-LPR-Issues-and-Options.pdf

- 1.8 A number of duplicate comments were submitted – for instance with identical comments from the same respondent being submitted via both email and letter. In such instances, duplicates were removed.

Consultation Summaries

- 1.9 After comments were processed in the manner described all of the comments received were reviewed on a policy-by-policy basis, with the issues included in the group of comments summarised. Such summaries are presented in the relevant tables of this report.
- 1.10 The summaries are a reflection of the issues raised during the consultation. They do not record every single comment or view that was made during the consultation. A record of all representations has been published online. GDPR and data restrictions have limited the ability of the Council to publish every representation in full on-line. Responses from statutory consultees, landowners and developers are available in full.
- 1.11 As individual comments were able to be tagged multiple times against different areas/issues of the Local Plan, the total of comments for each individual summary combined exceeds the number of comments received and is not an error. This reflects that a large number of comments covered numerous issues in their submission.
- 1.12 A number of petitions were submitted during the consultation period, or were referenced as part of comments. Such petitions generally related to potential strategic development sites. The number of signatories were often large and in most cases, the petition remained live beyond the consultation period and the number of signatories has continued to increase. The tally of comments in each summary represents the number of submissions received and not how many signatories there were to each petition, letter or email. In any case, it is the nature of the particular planning issues raised in comments that are most critical to the preparation of the Local Plan, not the amount of comments received.
- 1.13 A number of comments were submitted setting out views and feedback on the evidence base produced to support different elements of the Local Plan. Where relevant they are recorded in the summaries of related policies. Comments on the evidence base have been considered and where relevant have informed updates to such documents.

Next Steps

- 1.14 This document will be updated to set out how HDC has taken into account the comments made in informing the preparation of the Regulation 19 document. This updated document will be made available as part of any agreed Regulation 19 period of representation.

2. Consultation Summaries

Consultation Processes

| Consultation Process | |
|---|-----|
| Number of Comments | 200 |
| <p>Summary of Comments</p> <p><u>Members of the Public</u></p> <p>Views made about the consultation included:</p> <ul style="list-style-type: none"> - The Local Plan should be delayed due to the pandemic as not everyone has the ability to use the internet and the impact on future land use is unknown - The online system was difficult, particularly for older people. Some felt that the Council had deliberately made it hard to comment. - The level of detail was not appropriate – some people felt there was too much information and wanted the documentation to be simpler. Others felt more detail was needed, particularly on key sites - There was insufficient publicity/awareness of the consultation and the timescale was too short. - There should have been more public exhibitions across the district. There was too little detail at the Ashington event, and the Billingshurst event was overcrowded. - Government housing targets should be ignored or resisted. <p><u>Community Groups</u></p> <p>The Ifield Society commented that:</p> <ul style="list-style-type: none"> - There are too many documents which are complex to navigate. It should have been simpler. - Kilnwood Vale was shown as a permitted site at the exhibitions but it only has outline permission and therefore this was misleading <p>Wimblehurst Residents Association felt the wording of the HDC Draft Local Plan far too vague and aspirational, meaning that any planning application could correspond to the policies even if the scheme were to be totally inappropriate</p> <p><u>Parish Councils</u></p> <p>West Chiltonington Parish Council commented that the NPPF para 16c states that ‘plans should be shaped by early engagement’. They stated that the first engagement by HDC with West Chiltonington Parish Council and other Councils has been by this Reg 18 consultation, which would not mean national policy.</p> <p>Rudgwick Parish Council felt that HDC only make essential incremental changes to the Local Plan where it may be going off-track in terms of meeting its goals. This would save on resources and reduce controversy. They also stated that The consultation system does not allow copy and paste, affecting accessibility.</p> <p>Hurstpierpoint & Sayers Common Parish Council thought the document was light on detail and was more a set of questions. They also commented that there was limited details on the strategic sites to inform their response. Similar comments were put forward by Henfield Parish Council and the Inter Parish Group.</p> | |

Hassocks Parish Council: Prior to drawing up this consultation document, a greater level of professional analytical judgement should have been applied to filter the proposed sites using clearly identified rational criteria, in order to present a well-reasoned and balanced selection of sites for consultation.

Southwater Parish Council suggested that the Local Plan should be delayed until after the pandemic until the country was in a stable environment.

Pulborough Parish Council commented that under the current pandemic situation, they would challenge the need for so much additional housing. They also highlighted the large impact on Gatwick Airport and within the Gatwick Diamond.

Horsham Denne Neighbourhood Council explained the document often refers to other HDC documents, maps or policies and these should be linked in the Local Plan.

Statutory Consultees

Mid Sussex County Council commented that the Local Plan is high-level and in draft. They felt that HDC are putting a lot of stress on the public consultation exercise to inform any future choice of site selection but suggested that such choices should be made on evidence and sound planning judgements not on the feedback from consultation alone.

Other Organisations

Horsham Labour Party thought that the consultation should be delayed as it was difficult for groups to respond in the pandemic.

Introduction

| Support – Introduction | |
|--|---|
| Number of Comments | 4 |
| Summary of Comments <u>Members of the Public</u> One respondent supported the introduction on the understanding that sustainable rural development includes the conservation of both arable and grazing farmland which is paramount to the UK food security in the future. <u>Community Groups</u> Rudgwick Preservation Society and the Steyning Society indicated broad support for the introduction. | |

| Observation – Introduction | |
|---|---|
| Number of Comments | 3 |
| Summary of Comments <u>Members of the Public</u> One respondent commented that the Introduction does not emphasise the importance of developing infrastructure at the same time or before any development. <u>Community Groups</u> Horsham Society suggested adding the National Design Guide and Natural Beauty and Local Cycling & Walking Infrastructure Plans (LCWIP) as key references to paragraph 1.2. They also commented on the statement in paragraph 1.6 that <i>“This document does not apply to land inside the South Downs National Park”</i> , explaining that This excludes a swathe of the south of the district, thus concentrating the development in the mid and north. They felt development should be more balanced across the district. | |

| Object – Introduction | |
|---|---|
| Number of Comments | 6 |
| Summary of Comments <u>Members of the Public</u> Comments included: <ul style="list-style-type: none"> - Para 1.3 is not correct as it is not the case that Government sets housing targets but instead Government requires the standard methodology to be applied, which in turn provides a number. - An executive summary should be included as the Plan is very detailed. - Information about what happens if a Plan is found to be unsound should be provided. - The introduction should show how the Plan links to all elements of the NPPF – not just the need to deliver a sufficient supply of homes - An addition to the introduction should be made to show that the Plan will be subject to iterative reviews and a changing policy environment. | |

Planning Context

| Support – Planning Context | |
|--|----|
| Number of Comments | 17 |
| Summary of Comments <u>Members of the Public</u> A number of indications of support were given without any reasons being provided. <u>Parish Councils</u> Forest Neighbourhood Council made the following points: <ul style="list-style-type: none"> - In paragraph 2.3, they welcomed the recognition of the importance of services, facilities and open spaces to support the well-being of communities, and of the need to protect and enhance the built and historic environment of Horsham. - In paragraph 2.12 they welcomed zero carbon target but thought that the word “low” should be replaced with “zero” in 2.10. - In paragraph 2.13 they welcomed indication that neighbourhood plans could identify local green spaces but rewriting to “...Neighbourhood Plans also identify other more locally specific issues and objectives, such as the identification and designation of local green spaces as part of the green infrastructure network.” <u>Community Groups</u> Rudgwick Preservation Society and the Steyning Society indicated broad support for the section. | |

| Object – Planning Context | |
|---|----|
| Number of Comments | 78 |
| Summary of Comments <u>Members of the Public</u> A number of comments were made, which included: <ul style="list-style-type: none"> - The NPPF should be summarised in paragraph 2.2 and links provided to relevant sections with an explanation provided for how local housing needs are assessed. - The Local Plan would not achieve, through its allocation of housing, the sustainable development aims in paragraph 2.3, the Corporate Plan’s aims in 2.10, the zero carbon aims in 2.12 and impact negatively on Neighbourhood Plans as set out in 2.13. - Development is not plan led (paragraph 2.4) but reactive to sites put forward by developers. - There is no legal obligation to co-operate with other Councils as set out in paragraph 2.5 and instead the Council should resist claims by neighbouring authorities. - The position around Gatwick Airport and the Gatwick diamond has changed (paragraphs 2.7 and 2.8). - It was commented that development outside the SDNP can impact upon it and doubt was expressed that the effects of developments around the SDNP have been taken into account. It was suggested the wording be updated to reflect the setting of the SDNP, the views into and out from the park, and the value of its dark skies policy. - Covid-19 should be mentioned within the context. <u>Parish Councils</u> Forest Neighbourhood Council were of the view that the "duty to co-operate" is being overused to the detriment of Horsham, which is being pressured to take more than its fair share of new development. Storrington & Sullington Parish Council agreed and also mentioned that | |

Neighbourhood Plans are statutory planning documents and they believe that HDC has a duty to uphold them.

Community Groups

Ifield Society commented that paragraph 2.13 of Ruspur's Neighbourhood Plan covers most of the area West of Crawley - but not all, leaving the whole area vulnerable to development. They also felt that the context in relation to the Gatwick Diamond was too focused on economic rather than social or environmental issues.

Sussex Wildlife Trust stated in relation to paragraph 2.6 they do not see an up to date green infrastructure study or desktop ecological analysis for the potential strategic sites. On paragraph 2.9 they identified that the SDNP has a clear drive for the consideration and delivery of ecosystem services through its Local Plan.

Small Dole Action Group commented that Local Plans could override Neighbourhood Plan without the respect and consideration for the time, public money and dedication that is required to produce a Neighbourhood Plan.

Horsham Society felt that:

- Paragraph 2.3 should specifically detail the services, open spaces or facilities that Horsham District Council will provide.
- Paragraph 2.6 refers to the Sustainability Appraisal but this is not listed in the Evidence Base.
- Paragraph 2.9 should be added to, to explain that Horsham District Council also have a duty outside the National Park to conserve and enhance the natural environment and reflect the importance of the High Weald AONB.

The Inter-Parish Group and Henfield Parish Council suggested updating paragraph 2.9 update to reflect the need to consider the setting of the South Downs National Park (SDNP), the views into and out of the SDNP and the value of its dark skies policy.

Developers

A number of developers referred to the Duty to Cooperate and the need to help meet unmet need. Further comments were made on issues in the context, including in relation to neighbourhood planning and that not all areas are covered and therefore Local Plans need to be flexible to allow development to come forward where such plans are absent.

Spatial Vision and Objectives

| Support – Spatial Vision | |
|--|----|
| Number of Comments | 71 |
| <p>Summary of Comments</p> <p><u>Members of the Public</u></p> <p>Numerous comments were made, which supported different elements of this section. This included:</p> <ul style="list-style-type: none"> - Agree that a low carbon economy is essential - Support reference to expansion of towns and villages - New settlements are supported - Objectives likely to align with Neighbourhood Plans and local communities - Support specific reference to retirement housing - Support for the rural economy - Agree that new infrastructure is needed to support development - New developments should be in the north of the district - Agree that protection of environment and public transport are very important. <p><u>Community Groups</u></p> <p>Ifield society supported additional rural employment and consequent benefits</p> <p>Greening Steyning approved environmental and climate elements but thought this should be carried through the rest of the plan. They also thought objectives 9 and 10 should be moved up the list.</p> <p>South East Climate Alliance requested changes to paragraph 3.16 to promote modal shift to walking.</p> <p>Rudgwick Preservation Society agree with both the spatial context and the objectives and strongly support the environmental and community objectives. However, they caution that Objective 5 cannot be delivered sustainably if too many houses are foisted on the district. They agree that development quality should be a priority.</p> <p><u>Statutory Consultees</u></p> <p>Crawley Borough Council expressed:</p> <ul style="list-style-type: none"> - Welcome for the the intention for the Horsham Local Plan to meet, to an extent, the needs of the wider area; - Support for objectives 7 and 8 but requests that the character and heritage of Crawley is considered and new development fits in with Crawley where it is in close proximity. <p>Chichester District Council encouraged HDC to consider seriously the potential to deliver housing to meet wider unmet needs consistent with sustainable development.</p> <p>South Downs National Park Authority supported HDC continuing liaison with neighbouring authorities, including the SDNPA, to ensure cross-boundary strategic priorities are fully addressed.</p> <p><u>Parish Councils</u></p> <p>Inter Parish Group supported the Spatial Objectives, with a number of specific exceptions.</p> <p>Shipley Parish Council expressed support for a spatial strategy that mirrors historic growth patterns and accommodates housing requirements through the expansion of existing settlements whilst respecting the rural character of the District.</p> | |

Rudgwick Parish Council expressed a preference for new settlements over development in existing settlements without infrastructure. While Nuthurst Parish Council thought that strategic sites should be located in, or adjacent to, existing towns and villages where there are employment opportunities and infrastructure.

Shermanbury Parish Council expressed support for the objectives but would strengthen Objective 9 or include a new objective which prohibits building on land subject to river flooding and restricts building on land subject to poor groundwater flooding. They also thought objectives should also include an objective of safeguarding current and future developments from climate change.

Forest Neighbourhood Council was pleased that HDC recognises the need for increased provision of local and strategic services and facilities.

West Grinstead Parish Council welcomed the proposed vision stressing the need to live and work close to jobs services and facilities. They stated that would like to see a new Objective “minimising carbon footprint/addressing climate change/minimising dependence on the car”.

Horsham Trafalgar Neighbourhood Council agreed with the spatial context and the Objectives.

Developers and Agents

There was some agreement with the section in whole, or in part. Specific comments included:

- There should be a mixture of small and large allocations based on the settlement hierarchy.
- Support for one job per new home.
- The vision and objectives are realistic.

Observation – Spatial Vision

| | |
|---------------------------|-----------|
| Number of Comments | 76 |
|---------------------------|-----------|

Summary of Comments

Members of the Public

Comments were made suggesting amendments:

- Self and custom builds, park homes and dementia care should be referenced in objective 5
- Objective 6 should reflect desire to forward provide infrastructure
- Objective 8 should refer to preventing coalescence
- Objective 9 should be strengthened to look at flooding outside of development sites
- Sustainable travel should be added in objective 10
- The vision should state that priority should be given to brownfield development
- The vision or objectives should refer to water supply

New objectives were suggested, including:

- The Duty to Cooperate should be a specific objective.
- Addressing climate change/minimising carbon footprint should be inserted as a standalone objective.

Community Groups

Comments included:

- An objective about the impact of development on neighbouring authorities should be added
- Climate change should be referred in objective 1
- The wording is aspirational and infrastructure doesn't always come forward with funding limited.
- "enabling sustainable travel options for residents and not building in car dependent locations" should be inserted into objective 10
- Objective 5 should include prevention of coalescence.

Statutory Consultees

Highways England commented that where development adversely impacts the safe and efficient operation of the Strategic Road Network either individually or cumulatively Highways England will expect development to cover any necessary costs of improvements to make the development acceptable. Where alternative funding is to be sourced Highways England will need to be assured that the funding will be available at the point when the works are required.

Surrey County Council expressed concerns about the proximity of the proposed sites close to the Surrey boundary and the need for an assessment of the potential cumulative cross boundary transport impacts. A comparative assessment of the transport sustainability of the location of each of the strategic sites should be carried out, using similar methodology to that undertaken by the London Borough of Croydon.

Crawley Borough Council noted aspirations contained within Para 3.10 for Horsham to be the destination of choice in the Northern West Sussex Area as they would, though, be concerned if this aspiration were to result in a significant negative impact upon the vitality and viability of Crawley Town Centre. CBC hopes the aspiration in paragraph 3.14 is maintained in practice, rather than repeating the experience with Kilnwood Vale whereby the District Heat Network wasn't progressed once the development was commenced.

West Sussex County Council commented that there is a need to consider the location of sites in relation to minerals resources and waste infrastructure that are safeguarded for their uses.

The Environment Agency felt that objective 9 could be more aspirational as they would wish to see the Plan go beyond "minimise the impact" and look to all development to bring about environmental improvements.

Parish Councils

Horsham Denne Neighbourhood Council agreed with paragraph 3.24 in that Horsham town is the main focus for cultural facilities & leisure but it should not have to bear the brunt of development just because of its size.

Developers and Agents

Comments included:

- Gatwick Diamond is important and the district plays an important role
- There should be a recognition of the relationship with Crawley Borough
- Additional employment allocations should be added to prevent the district becoming a dormitory district and that the Council is right to be concerned about this.

| | |
|--------------------------------|------------|
| Object – Spatial Vision | |
| Number of Comments | 198 |
| Summary of Comments | |

Members of the Public

Comments made included:

- The allocation of particular strategic sites or significant development within existing settlements is contrary to the vision
- The vision and objectives need to be recast to take into account Brexit and the pandemic
- Housing being built is not affordable for locals nor do they reflect the type needed
- More reference to infrastructure is needed in the objectives (transport, hospital, etc.) as it is poorly served
- Objectives should be based on available evidence
- An objective is needed for brownfield land
- An objective in relation to air pollution should be introduced.
- There is no reference to culture and arts in the objectives.
- The objectives need to be strengthened in relation to flooding.
- The importance of the environment, landscape and rural character should feature more heavily
- Objective 1 is vague and unmeasurable.
- Objective 3 will stifle any innovative approaches of the District, by remaining within the existing hierarchy.
- Objective 9 needs to have a stronger alignment with Section 15 of the NPPF. Strategic sites need to be reviewed to ensure they meet this objective
- Objective 10 (climate change) should be at the top of the list as it is the most important

Other comments expressed scepticism at whether development would help deliver the objectives or achieve the vision. Others felt that the vision was too vague with terms needing definition.

Community Groups

A number of groups mentioned that the allocation of particular sites would be contrary to the vision and objectives, that the order of the objectives aren't put in order of importance, housing that is delivered does not reflect local need and there is a lack of infrastructure promised. Other comments related to a number of environmental matters that should be specified, such as tree planting, biodiversity enhancement and retention and the Council should commit to achieving environmental targets prior to their requirement.

Friends of Warnham Nature Reserve expressed that paragraph 3.15 was going to make life ever more difficult for the motorist. Developing alternative forms of transport should not be "at the expense of" the car it should be "as well as" the car. Change to *"help reduce the reliance on private vehicles without making private transport slower or less reliable"*.

Campaign to Protect Rural England suggested:

- A new objective - *'To achieve a sustainable use of ecosystem services thus enhancing natural capital across Horsham District and contributing to wealth and human health and wellbeing'*
- Amending paragraph 3.13 to read *"The rich heritage and high quality natural environment, and the significant contribution this makes to the overall attractiveness, economic competitiveness, the health and wellbeing of people, and the identity of the district is recognised and promoted"*.
- Greening Steyning expressed that radical changes will be needed for the District to become 'well connected' with low carbon transport options.

Horsham Labour Party stated:

- Para 3.14 was not sufficiently ambitious as all new housing projects can and should be designed to meet net zero carbon emissions.
- Para 3.15 was not sufficiently prescriptive and should be complemented by a policy statement that places strong emphasis on the need to minimise travel needs by building whole communities with a mix of uses and that all sizable settlements (500 homes or more) should have a local district centre providing a range of facilities to prevent create of dormitories.
- Para 3.17 Sustainable development requires a properly funded, quality local bus network that serves the whole community and deliver a modal shift away from private cars.

Sussex Wildlife Trust stated:

- Para 3.14 should be amended to *“The environmental resources and quality of the area will be understood, enabling it to be maintained and enhanced, so that natural solutions contribute to climate resilience.”*
- Objective 9 amend as follows *“..development brings forward environmental net gains including measurable biodiversity net gain”*.

Statutory Consultees

Mid Sussex District Council stated There was a need for the Plan to provide a clearer spatial framework and it would be more appropriate if Horsham explored a range of integrated spatial options and considered their merits or otherwise. Eg: Concentrating growth within rail corridors; Concentrating growth around major settlements; concentrating growth in the west of the district around Billingshurst/Pulborough; Expansion of Horsham; Balances of larger and smaller sites; Sub regional new settlement options.

Natural England stated that:

- Biodiversity, landscape, climate change and green infrastructure need to form a stronger element of these objectives.
- The term ‘harmony with the natural environment’ is vague and we would look for a stronger signal from the Council to seek an enhanced and thriving natural environment.
- They welcome the commitment to contribute to the Nature Recovery Network and advise that this section also captures a commitment to a measurable Net Gain in biodiversity
- Objective 8 needs to highlight the nationally important landscape within and around the district (High Weald AONB and the South Downs National Park)
- Objective 9 should be much more ambitious to address the issues of biodiversity decline and climate breakdown.
- Objective 10 does not reflect the true implications and the considerations which are required for climate change through Plan making.

Parish Councils

A number of comments were made by the Parish/Neighbourhood Councils. This included:

- There is a lack of infrastructure in rural areas and this makes non car based travel impractical
- The Council must avoid the district becoming a commuter/suburban district
- The wording within the section should be stronger use ‘must’ rather than should, etc.
- Low Carbon/Zero Carbon should be reflected more strongly or a standalone objective inserted
- The allocation/distribution of development are contrary to the vision/objectives as they are not sustainable and are counter to elements of made/emerging Neighbourhood Plans
- Statements within the section lacked evidence (e.g. paragraphs 3.19 and 3.26)

- The vision is not deliverable

Developers Agents & Landowners

A number of comments were made, generally objecting against parts of the vision/objectives that do not coincide with their development proposals. Other comments were made supporting elements of the vision/objectives while noting that a development that they were proposing was not recommended for allocation.

Policy 1

| | |
|---|-----------|
| Support – Policy 1 | |
| Number of Comments | 11 |
| Summary of Comments <u>Members of the Public and community groups</u> Most of those who commented indicated support without explaining why. <u>Site Promoters</u> Comments were brief but expressed that they were encouraged to see use of model wording and intention to work with applicants. | |

| | |
|--|----------|
| Observation – Policy 1 | |
| Number of Comments | 9 |
| Summary of Comments <u>Members of the Public and community groups</u> Comments included: <ul style="list-style-type: none"> - Incentives are needed to encourage brownfield development to enable delivery of sustainable development. - The NPPF has been ignored in previous decisions by the Council. - Sustainable development involves meeting local needs not anything beyond. - Infrastructure is needed to achieve sustainable development. - The ‘presumption in favour’ seems to favour new residents and businesses not existing. <u>Parish Council</u> Forest Neighbourhood Council acknowledged that this is the ‘model’ policy but asked to what extent the policy is forced on the Council as they were of the view that the level of development proposed was not sustainable. | |

| | |
|---|-----------|
| Object – Policy 1 | |
| Number of Comments | 11 |
| Summary of Comments <u>Members of the Public and community groups</u> Comments included: <ul style="list-style-type: none"> - That the policy is not reflected by potential allocations which would breach its requirements. - The policy does not refer to the climate challenge or the need to achieve zero carbon by 2050 - By relying on national policy and not local policy if the plan was out of date would not deliver sustainable development - The policy is not reflective of the Council’s approach that judges sites by location within or near to a settlement rather than their sustainability and access to services. - The Council should adopt the ‘precautionary principle’ towards development. - The ‘presumption in favour’ tips the balance in favour of development. - NPPF paragraphs on transport should be referred to. - The policy should be more specific as it reads that any application could be approved. | |

- Their interpretation of sustainable development is different to the Council's.
- It is unnecessary to repeat national policy as when adopted the Local Plan will comply with it.
- The Council should refer to the recent Heathrow judgement about the failure to consider environmental policy.
- 'Approved without delay' from the policy as applications should be fully assessed and presumed consent is not acceptable. Where no policies exist, policies from neighbouring councils could be used.
- There should be reference to environmental assets that are afforded protection, cumulative impacts should be considered and that development should be future proofed to take advantage of new communication and transport technology.

Parish Council

Bramber Parish Council wanted an additional clause inserted – “When determining any planning application, the Authority will consider the cumulative impacts of development.”

Policy 2

| Support – Policy 2 | |
|---|----|
| Number of Comments | 56 |
| <p>Summary of Comments</p> <p>A number of representations submitted against this policy were in relation to Built-up Area Boundaries and the proposed Secondary Settlement designations and related boundaries. These comments are summarised elsewhere.</p> <p><u>Members of the Public and community groups</u></p> <p>Rudgwick Preservation Society supported the development hierarchy, although raise concerns about infil of gardens which are detriment to the streetscape.</p> <p>Ifield Society supported the proposed designation of Ifield as ‘Secondary Settlement’ within development hierarchy.</p> <p>In addition to the points above, other reasons for members of the public/community groups supporting the policy included:</p> <ul style="list-style-type: none"> - Smaller hamlets should remain unique. - Prioritise development of in-fill and brownfield sites, followed by development alongside existing towns with infrastructure. - Agree with classification of Henfield in the development hierarchy as ‘Small Town / Larger Villages’ - Principle of development hierarchy is supported. However, compared to other settlements listed in the ‘Medium Villages’ category, Ashington is faced with an unprecedented level of growth. - Support proposed designation of Faygate as ‘Secondary Settlement’ but question as to whether this will restrict development so village will not adjoin Crawley. - Agree with classification of Slinfold in the development hierarchy as ‘Medium Villages’ - Support proposed classification of Partridge Green in the development hierarchy as ‘Small Town / Larger Village’. - Agree with classification of Southwater in the development hierarchy as ‘Small Town / Larger Villages’. - Agree with classification of Rudgwick as ‘Medium Villages’ in the development hierarchy. - Support definition of ‘Secondary Settlements’ classification. - Agree with criterion 3, increasing traffic will negatively affect the road infrastructure and contradict this statement. - Agree with settlements listed within ‘Secondary Settlements’ classification. - Support categorisation of Billingshurst as ‘Small Town / Larger Villages’. - Support classification of Barns Green as ‘Medium Villages’ within the development hierarchy. - Agree with proposed ‘Secondary Settlement’ classification of Kingsfold within the development hierarchy. Observation that if proposed allocation Land at Kingsfold is progressed that the settlement would need to move further up the categorisations within the development hierarchy. - Welcome additional proposed classification of ‘Secondary Settlements’ as there will now be opportunities for development at a limited scale. All identified settlements have an important role to play in accommodating new growth in the District. | |

- Agree with classification of Steyning and Bramber as 'Small Town / Larger Villages'
- Support categorisation of Pulborough and Codmore Hill as 'Small Town / Larger Villages'

Horsham Labour Party expressed broad support for the strategic policy but felt that there should be more positive encouragement of redevelopment in and around Horsham Town Centre to replace a low-density ageing housing stock with higher density energy efficient homes.

Stammerham Amenity Association stated support for the hierarchy with the exception of Christ's Hospital. Support will be withdrawn if any of the current 'Unclassified Settlements' were promoted to the proposed 'Secondary Settlements' tier.

Parish Councils

Broadbridge Heath Parish Council state that they are in general agreement with the classification of Broadbridge Heath as 'Small Towns / Larger Villages'.

Nuthurst Parish Council agrees with the proposed development hierarchy for the settlements within its Parish.

Developers/Site Promoters

West Sussex County Council Asset Management & Estates Department support the classification of Horsham as 'Main Town' and Henfield as 'Small Towns / Larger Villages' in the development hierarchy.

Observation – Policy 2

Number of Comments

34

Summary of Comments

A number of representations submitted against this policy were in relation to Built-up Area Boundaries and the proposed Secondary Settlement designations and related boundaries. These comments will be summarised elsewhere

Keep Southwater Green stated that the potential strategic housing allocations contradict Strategic Policy 2 – Development Hierarchy.

Ifield Village Conservation Area Advisory Committee questioned what the interaction is between BUABs within Horsham District and those of neighbouring authorities?

In addition to the points above, members of the public made the following observations:

- Para 4.5 states "... development takes place in a manner that protects, retains and enhances the rural landscape character of the District ..." – How is this measurable? Must be clear on the definition of how it is identifiable by examples etc. Otherwise it appears to be down to personal opinion.
- Interplay between population size of a settlement and the services / facilities that settlement can sustain.
- Policy should give priority to developments served by existing railway infrastructure to reduce CO2 emissions in line with Government policy.
- There is a need to keep to the policy and not exceed the boundaries of settlements as the nature of the district is being changed.
- Emphasise the priority to use brownfield sites as far as possible in line with recent Government advice and the release of funding for this purpose.

- Criteria 3 should be more clearly defined as “significant increase in activity” has too much wiggle room for it to mean anything.
- Does a defined settlement boundary mean settlements, such as Faygate and Christs Hospital, will be protected from adverse development of nearby towns?
- Current development hierarchy does not recognise the long term option of establishing a ‘Secondary’ main town, based on the strategic transport network, which could be a hub for long-term ‘Place-making’ investment.
- Para 4.7 suggests development within urban areas is acceptable in principle which fails to recognise and respect green spaces and non-residential accommodation that provide essential services and functions.
- Ashington is classified as a ‘Medium Village’ within development hierarchy. However, the level of growth proposed is proportionate to that adjoining settlements within the ‘Small Town / Larger Villages’ category.
- It is acknowledged that there is ‘some’ access to public transport for settlements listed within the ‘Medium Villages’ categorisation, but it is felt that this is far from reasonable or adequate.
- All settlements identified within the development hierarchy have an important role to play in accommodating new growth in the District.
- Evidence Base lacks an up-to-date Urban Capacity Study indicating location and number of dwellings that could realistically be accommodated in Horsham town, detailing all brownfield sites that are suitable for development.
- Evidence Base requires an updated Settlement Sustainability Review as aspects of 2014 document are inevitably out-of-date.
- Whilst development hierarchy will be a tool in guiding development, it may be the case that some settlements will be able to accommodate a higher proportion of growth than others within the same tier

Parish Council

Slinfold Parish Council commented on the settlement characteristic and functions of the categorisation ‘Medium Villages’ – dependence on larger settlements implies that public transport must be maintained and enhanced, otherwise any new developments will result in an increase in private vehicles.

Statutory Consultee

Crawley Borough Council provided the following comments in relation to para 3.26

- “Infill should also be carefully considered in the same way in which it has to be in Crawley to push the numbers up, such as: upward extensions; densification, small sites; open space; town centre taller buildings. This will offer a variety of sites in terms of scale, mix and location which will aid delivery, especially in the short to medium term.”
- “West of Crawley is not (correctly) identified as a new settlement, yet it will need all of these elements to be provided (as well as additionally to meet unmet needs arising from Crawley, e.g. secondary education) in line with Crawley’s neighbourhood principle to avoid negative impact on existing facilities within Crawley (except possibly additional employment if that can be provided in the North of Crawley Area Action Plan area).”

In addition; Crawley Borough Council question whether it may be necessary to proactively change a settlements function and place in the hierarchy, i.e. a small town becoming a second main town, in order to maximise development in the most sustainable location and secure sufficient infrastructure to support this? Horsham is the only main town in the district (compared to

Haywards Heath, Burgess Hill and East Grinstead (and possibly increasingly now Hassocks) in Mid Sussex). Is this necessary (or even realistic) to maintain this same hierarchy, particularly with increasing emphasis on strategic sites to meet growth levels?

Highways England provided feedback on criterion 3, stating that this requirements may not provide the flexibility that the local plan requires in terms of use of the existing road network. In some parts of the network it may be acceptable to increase traffic flows without detriment to the safe and efficient operation of the highway network.

Object – Policy 2

Number of Comments

176

Summary of Comments

A number of representations submitted against this policy were in relation to Built-up Area Boundaries and the proposed Secondary Settlement designations and related boundaries. These comments will summarised elsewhere

Members of the Public and community groups

Horsham District Cycling Forum requested criterion 3 to be amended to read *“the development does not result in a significant increase in activity including private motorised traffic movements on narrow and rural roads.”* It is also requested than an additional criterion is added to the policy wording *“the development fits into and extends local cycling and walking networks.”*

Littleworth Residents Association objected to the proposed re-classification of Partridge Green as a ‘Small Town/Larger Villages’ within the development hierarchy as in their view it is not a hub for smaller villages as described and cannot be compared to other settlements within this category.

Horsham Society requested additional criterion “Development in urban areas must recognise that green spaces, wildlife and facilities remain essential so loss of these will be resisted”.

Friends of Warnham Nature Reserve requested change of classification of Southwater and Broadbridge Heath, to be included with Horsham in ‘Main Town’ categorisation.

Ifield Village Conservation Area Advisory Committee objected to the proposed classification of Ifield as a ‘Secondary Settlement’.

Adversane Residents Association objected to the proposed classification of Adversane as a ‘Secondary Settlement’ and request it remains categorised as an ‘Unclassified Settlement’ within the development hierarchy.

Ashurst Women’s Institute request Ashurst be re-classified as an ‘Unclassified Settlement’ rather than the proposed ‘Secondary Settlement’ status as defined in the development hierarchy.

Stammerham Amenity Association objected to Christ’s Hospital classification as ‘Smaller Villages’ and request re-categorised as a ‘Secondary Settlement’ in the development hierarchy.

In addition to the points above, other reasons for members of the public objecting included:

- There is no clear recognition of surrounding natural habitats within para 4.7

- Criteria listed does not make recognition as to how development could be detriment to the natural or surrounding habitat. Plans should identify a minimum 0.5 mile restraint.
- Change categorisation of Bramber to 'Medium Villages' in development hierarchy.
- Contentious classifications.
- Thakeham should not be re-categorised as a 'Medium Village' in the development hierarchy.
- Remove Blackstone from the proposed 'Secondary Settlement' category and include within the 'Unclassified Settlements' detailed within the development hierarchy.
- Billingshurst does not have the right level of services and facilities to serve existing community, let alone sustain additional development.
- Policy contradicted as a number of sites are located outside of the defined settlement boundary.
- Cowfold should be re-categorised 'Small Town / Larger Villages' in development hierarchy if site promoted north of settlement is allocated.
- Strategic Policy 2 and Strategic Policy 3 could be merged, at present the wording is contradictory to each other.
- Must be clear that new plan-led growth will not be restricted to areas within BUABs; it will also involve the expansion of main settlements. Policy wording should be amended to "Development will be directed to"
- Para 4.8 redefines BUABs, particularly Horsham Town. If this redefinition continues over time there will be creeping development until no open space surrounding the BUABs.
- Need to recognise the inherent difficulties involved with developing brownfield sites.
- Ashington should be re-classified as a 'Smaller Villages' in the development hierarchy.
- A new classification 'Semi-greenfield' should be created for areas that have not previously been built on, to facilitate exceptional circumstances where land inside the town boundary may be excluded from development where a clear need can be identified for a use that will benefit the people of the town and beyond.
- Change categorisation of Bramber to 'Smaller Villages' in the development hierarchy.
- Classification of Cowfold in the development hierarchy should be amended from 'Medium Villages' to 'Smaller Villages'.
- Disagree with the premise that preference / sustainability / suitability for development can be assessed based on size and amenities of existing settlements.
- Does not pass the test of soundness as set out in para 35 of the NPPF.
- Kilnwood Vale should be included within the hierarchy and categorised as 'Small Towns / Larger Villages'
- Policy wording should include the limitations of development associated with each settlement, in line with the hierarchy.
- Defines two separate approaches to defining settlement boundaries which could create conflicts across the plan. Clarity is required.
- Wiston should be re-classified as a 'Secondary Settlement' within the development hierarchy.
- Amend classification of Five Oaks to 'Secondary Settlement' within the development hierarchy.

Parish Council

West Grinstead Parish Council objected to the proposed re-classification of Partridge Green to a 'Small Town/Larger Villages' within the development hierarchy. They state that information contained within the 2014 Settlement Sustainability Review remains valid and there is no justification for the amended hierarchy.

Colgate Parish Council request that all smaller and less sustainable villages and hamlets included in the list of 'Secondary Settlements' should be re-categorised as to 'Unclassified Settlements' within the development hierarchy.

Thakeham Parish Council objected to the proposed re-classification of Thakeham (The Street and High Bar Lane) to a 'Medium Village' within the development hierarchy. They state that the settlement characteristics and functions description set out for 'Smaller Villages' meets the description of Thakeham.

Ashurst Parish Council object to the proposed classification of Ashurst as a 'Secondary Settlement' and request it remains categorised as an 'Unclassified Settlement' within the development hierarchy.

Bramber Parish Council feel very strongly that Bramber should be regarded as a settlement in its own right and not coupled with Steyning. However, if Bramber is to be treated independently then the categorisation of a 'Small Town/Larger Village' is incorrect and should be re-classified as 'Smaller Villages' within the development hierarchy.

Policy 3

| Support – Policy 3 | |
|---|----|
| Number of Comments | 28 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Rudgwick Preservation Society broadly supported the policy, with strong agreement of criterion 4, albeit they expressed that criterion 1 needs to be rewritten so that it makes sense.</p> <p>Horsham Society supported the idea of defensible boundaries and expects HDC to defend and maintain.</p> <p>Several representations received from members of the public in support of this policy did not include any specific comments or feedback. However, in addition to the points above, other reasons for support included:</p> <ul style="list-style-type: none"> - Expansion of settlements will be required and should be prioritised. - Existing settlements already provide all the necessary infrastructure and services. - Expand existing settlements rather than create new ones on greenfield sites. - Bringing forward a larger number of smaller sites, well related to settlement, will speed up delivery of new homes. Larger sites are dependent upon the delivery of significant infrastructure which can delay housing. - Growth of suitable settlements will enable them to sustain and enhance the vitality and function of local services and facilities and provide an appropriate level of affordable housing to meet the identified local need. - Criterion 1 supports a plan-led approach in line with the presumption in favour of sustainable development, para 67 of NPPF. - Criterion 2 consistent with para's 72 and 127 of NPPF. - Criterion 3 supports recognition of the particular importance of affordable housing for the elderly, families and households seeking to remain in their local area for personal or employment reasons. - Criterion 5 considered to be generally in accordance with para 20 of NPPF. <p><u>Statutory Consultees</u></p> <p>Crawley Borough Council supported, subject to it being made clear that it does not apply to Crawley.</p> <p><u>Developers/Site Promoters</u></p> <p>West Sussex County Council Asset Management & Estates Department support the recognition that growth of sustainable settlements is needed and the Horsham District Council Property & Estate Team support policy.</p> | |

| Observation – Policy 3 | |
|--|----|
| Number of Comments | 24 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>The following observations were received from members of the public:</p> | |

- Question the need – if a site is allocation in the emerging plan, then by definition it will form part of the proposed urban area and must be deemed acceptable in all respects and meeting the criteria. Is the policy intended to guide allocations in neighbourhood plans and rural exception sites?
- Worthwhile to have such a policy as gives flexibility in the event that the allocated sites are not delivery required housing levels. However, as worded it is not clear as the circumstances in which is should be applied.
- Need to make clear evidence to support Criterion 3 on what data and how it is obtained.
- There is an interplay between the population size of a settlement and the services and facilities that settlement can sustain.
- In the event that Neighbourhood Plans are slow updating or being ‘made’, how will the Council maintain its housing delivery?
- Will the District seek to allocate of approve sites based on the number of dwellings allocated per plan area?
- Will sites be allocated based on the Councils evidence base?
- There are areas which currently fall outside of defined boundaries but are part of a settlement both functionally and visually. Would the council support windfall or infill in these highly sustainable, not isolated, locations for a limited amount of housing?
- Is policy intended to guide additional locations in Neighbourhood Plans and rural exception sites?
- Dispersed rural growth would represent a more balanced approach to housing distribution across the District with minimal impact upon environmental designations.
- Smaller sites (i.e. 50 homes or less) should come forward from Neighbourhood Plans not the Local Plan, this goes against Localism Act 2011.
- Too often the character of the existing settlement is damaged.
- Needs to reflect Policy 8 to ensure rural economic development is not constrained to BUABs, allocation in Local Plan or Neighbourhood Plans.

Developers/Site Promoters

West Sussex County Council Asset Management & Estates Department make the observation that the Local Plan should make allocations of 10+ dwellings where they meet the criteria set out in this policy.

Object – Policy 3

Number of Comments

59

Summary of Comments

Members of the Public and community groups

The Steyning Society requested an additional criterion to read, “The development has been fully assessed by reference to a sustainability appraisal that recognises the impact on neighbouring settlements, transport infrastructure and landscape. It should make the best use of existing resources and cause the least disruption to local communities and services.”

Horsham District Cycling Forum stated that the NPPF requirements on location of developments need to be explained more clearly. An additional criterion should be added – “The location of the development does not increase local car dependency and the developer demonstrates how the site can fit into cycling and walking networks.” South East Climate Alliance supported this request.

Additional comments included:

- Not currently able to pass the tests of soundness as set out in para 35 of NPPF.
- It is not sustainable to continue to use sites outside of BUABs.
- Once allocated the principle of development is confirmed and process moves to an application. Policy creates a confusion position. As written the policy would require allocated sites to be re-assessed.
- Para 4.9 should contain a clause to prevent expansion leading to coalescence. Where new developments of more than 500 dwellings are proposed they should be on the boundary of an existing settlement.
- Far too much flexibility to the Planners.
- Some duplication with Strategic Policy 2, which also seeks to control the location of development.
- Policy should replicate Facilitating Appropriate Development (FAD) SPD.
- Prohibits sustainable development. Policy should be divided to create two separate criteria; sites already allocated and sites which adjoin or in the immediate location of settlement.
- If the Council are going to rely on windfall sites for delivery of 10% of its housing this policy should be amended to reflect.
- Level of expansion is not always appropriate to the scale and function of the settlement. Smaller scale developments would mitigate this.
- Not clear whether policy relates to a large or small scale expansion, both or everything in between.
- Policy is contrary to supportive text.
- Contrary to para 16 of NPPF. Policy should be re-worded to make clear that development on allocate sites will be supported, alongside clear criteria for how the Council will support other proposals for sustainable development outside BUAB.
- Does not provide advice or policy basis about how brownfield sites on the edge of a settlement should be dealt with by the planning system, creating potential consequence of forcing exclusion of key brownfield sites.

Parish and Neighbourhood Councils

Forest Neighbourhood Council stated that there is a need to expand on the wording of community facilities in criterion 3.

Slinfold Parish Council stated that the application of this policy could lead to coalescence of Slinfold and Broadbridge Heath/Wickhurst Green. Text of policy should reflect that there will be occasions when the local plan or neighbourhood plans would rule against expansion.

Thakeham Parish Council requested an additional criterion stating strategic aim of avoiding impact on green gaps between rural settlements and associated coalescence.

Developers/Site Promoter

The majority of objections received were from agents and developers with the overarching theme of the policy being too restrictive. In addition to requests for deletion of the policy, there were a number of suggested amendments to the current wording:

- Delete criterion 1 or amend to read "... or in a Neighbourhood Plan, or where the site adjoins an existing settlement edge and the proposed development is for fewer than 15 dwellings." Numerous variations of this rewording was seen across representations from those representing multiple different sites.
- Remove "...and adjoins an existing settlement edge" From criterion 1.

- Amend criterion 5 to read “The development is contained within justified boundaries ...”
- Additional criterion should be included – “Connection of the expanded settlement to its historic core prioritises sustainable transport.”
- Amend to state “any of the criteria are met” to provide a flexible pro-growth approach.
- Create clear sub-sections for different types of sites adjacent to settlements –
 “Settlements can be expanded in specific situations:
 - a. Where allocated in a Local Plan and / or Neighbourhood Plan; or
 - b. The development proposals redevelop a brownfield / previously developed site that adjoins the settlement boundary and results in improvements in terms of landscape and / or townscape impacts; or
 - c. Other sites where:
 - i. The expansion is appropriate to the scale and function of the settlement;
 - ii. The development is demonstrated to meet the identified local housing needs and / or employment needs or will assist the retention and enhancement of community facilities and services; and
 - iii. The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.”
- Criterion 3 is unclear, further justification is required providing details of how future applicants and developers can define local housing need.
- Additional criteria stating need for a full infrastructure assessment to highlight deficiencies, opportunities, community waste etc.
- Amend criterion 5 to state “.... Defensibly boundary that Horsham District Council Planning Authority will vigorously defend, and the”

Policy 4

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| Support – Policy 4 | |
| Number of Comments | 9 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| Rudgwick Preservation Society supported this policy. | |
| Horsham Labour Party broadly support this policy, though felt that (without compromising the status of the conservation areas) there should be more positive encouragement of redevelopment in and around the Town Centre to replace a low-density ageing housing stock with higher density energy efficient homes. | |
| A number of comments were made in relation to criterion 6 with the view that the proposed Rookwood strategic allocation contradicts this policy. In addition to the points above, other reasons for support included: | |
| <ul style="list-style-type: none"> - Agree with principles of the policy, Horsham has the capacity to support growth as the road network is already in place, along with communications and railway network. - There is sufficient brownfield land / industrial estates that have deteriorated in quality that can be repurposed for development. - Strong support for criterion 6, green spaces are critical for the attractiveness of the town as well as for physical and mental wellbeing and wildlife. - The continued recognition of Horsham Town as being the main settlement is clearly reflected in proposed policies. This is in accordance with the NPPF, and the principle of sustainable development. | |

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| Observation – Policy 4 | |
| Number of Comments | 15 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| The following observations were received from members of the public: | |
| <ul style="list-style-type: none"> - Horsham Town is not retaining its unique historical and cultural market town character. Keep more of the towns characterful older buildings such as the Drill Hall. - Council need to be more proactive in ensuring independent shops are sought and retained. - Proposed Rookwood allocation undermines the objectives of this policy. - Authority needs to remain sensitive to what makes the district a good place to visit. - Every criterion needs to be adhered to. - Current greenspaces need to be protected, maintained and enhanced. - Horsham Town does not need to become a place for everyone in the South East to visit in order to shop and eat. - Transport infrastructure requires improvement. - Necessary increase in housing should be matched with similar investment in green spaces. - Chesworth Farm should be expanded through purchase of Muggage Field and create a nature reserve. - Expand Warnham Nature Reserve by re-wilding Rookwood Golf Course. | |

- Why should Horsham be the main settlement? Is there a case for a second large settlement in the south of the District?
- Opportunities for wide range of employment has been reduced in the last five years.

Parish Councils

Thakeham Parish Council observed that the policy should identify Horsham Town as suitable for relatively dense forms of development, suited to resident groups most likely to benefit from urban setting such as starter homes for young families, homes for single people, and for the elderly.

Denne Neighbourhood Council ask for a map identifying the BUAB of Horsham that showed the green spaces and think a link within the policy would be beneficial.

Statutory Consultees

Crawley Borough Council support the protection and enhancement of formal and informal green spaces within the urban area. However, request that HDC undertake open space studies in order to maximise development opportunities and provide a variety of sites to help enable delivery to meet Horsham's own needs within the existing main towns, in turn enabling any decisions on extensions to Crawley to meet the needs arising from Crawley.

Object – Policy 4

Number of Comments

9

Summary of Comments

Members of the Public and community groups

Horsham District Cycling Forum and South East Climate Alliance proposed amended wording to criterion 4, to comply with para 35 NPPF – “Promotes high quality transport infrastructure, prioritising walking, cycling and public transport over private motor traffic and contributes to the Horsham Cycling and Walking Infrastructure Plan;”

Friends of Warnham Nature Reserve expressed that the policy should be reworded to state that the rate of change for Horsham Town will be slowed and that development will be redirected to more southerly areas that have not had such a high rate of change.

The Horsham Society requested an additional criterion to read – “Retain and protect Nature Reserves, Ancient woodland, veteran and ancient trees, hedgerows, green corridors and SSSI against any or adjacent development.”

In addition to the points made above, the following reasons for objection were received from members of the public:

- The policy does not include any reference to maintaining or enhancement to leisure and environmental facilities within the town boundaries.
- Policy should include a criterion in relation to safety – where development does not negatively impact on the safety of those living and working in the town. Increased travel and increase in residents can all negatively affect safety.

Sussex Wildlife Trust feel that, as a point of reference, it would be beneficial to have a small insert map to explain the extent of the cover of this policy. The Trust also request additional wording, amending criterion 6 to read – “.... Informal green space within the town to ensure these assets

can deliver towards the district's strategic vision for Green Infrastructure." As well as a new criterion – "7. Integrates creative and measurable net gains for biodiversity."

Developers/Site Promoters

West Sussex County Council (Property and Assets) objected to the deletion of HDPF Policy 8 and request that a new policy is drafted in the emerging Local Plan identifying Novartis site as a mixed used development site reflective of the planning permission and maintaining the aspiration of the site for a high quality mixed use quarter.

Policy 5

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| Support – Policy 5 | |
| Number of Comments | 7 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> Rudgwick Preservation Society expressed support for the policy. A number of individuals commented on the opportunity afforded by the area’s accessibility to Horsham Town and its facilities, particularly using sustainable modes of transport. <u>Parish Council</u> Horsham Trafalgar Neighbourhood Council supported the draft policy. <u>Horsham Labour Party</u> The Horsham Labour Party broadly supported the policy, commenting on the need for higher density, energy efficient housing stock in and around Horsham Town Centre. | |

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| Observation – Policy 5 | |
| Number of Comments | 10 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> Rudgwick Preservation Society emphasised the importance of point 10 of the policy, highlighting concerns over changes to the road network in the area. A number of individuals made observations on the policy, including: <ul style="list-style-type: none"> - The need for the expansion of the retail park while maintaining sufficient customer parking - The importance of focusing development in areas with good public transport links with Horsham Town - The importance of environmental sustainability in respect of transport and development itself <u>Parish Council</u> Horsham Denne Neighbourhood Council suggested that the early engagement with Parish Councils outlined in the supporting text should be applied to other policies in the plan. <u>Crawley Borough Council</u> Crawley Borough Council suggested that the policy could be more specific about the intended type, and amount, of retail space which should be provided in the area. | |

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|----------------------------|-----------|
| Object – Policy 5 | |
| Number of Comments | 11 |
| Summary of Comments | |

Members of the Public and community groups

A representation was submitted by Wimblehurst Road Residents' Association commenting on the importance of Horsham Town Centre as a focus for amenities for the town.

The Horsham Society proposed a change to the policy requiring the retention of green space and woodland cover.

Horsham District Cycling Forum suggested changes to the policy which encourage consideration of cycling infrastructure in the area.

A number of individuals commented on the policy, with common issues being:

- Concern about effect of recent changes to road layout
- The importance of Horsham Town Centre as a focus for district amenities
- The need for amenities for local residents, such as healthcare provision, in the area following recent (and potential future) development
- The need to amend the policy to reflect the areas importance for sports and leisure facilities as well as retail and residential uses

Parish Council

The Parish Council generally supported the policy, and development on the site, subject to a number of assurances. They objected to any potential loss of the running track. Mixed used development on the current depot site would be supported provided it had good connections and accessibility to the wider village, however the future of the current Tesco supermarket site should be made clear in the policy.

Policy 6

| Support – Strategic Policy 6 Economic Growth and Chapter 5 Introduction | |
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| Number of Comments | 17 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>A number of individuals either supported or showed some support for Policy 6 and the introduction to Chapter 5. They indicated support for the following reasons:</p> <ul style="list-style-type: none"> - Provision of employment opportunities and affordability of housing are critical and houses should be priced accordingly - Provided the business need is there the plan makes sense. Sustainable businesses are required with a long term view, there should be less speculative commercial development. - Policy is appropriate – it tries to ensure development will meet the needs of the local communities while retaining their characteristics. - Sites specifically supported: <ul style="list-style-type: none"> o Hop Oast Roundabout – appropriate location to serve Horsham and Broadbridge Heath. o Star Lane Trading Estate – appropriate location especially if linked with relocating Huffwood Estate and redeveloping it for housing. o Land near Hilliers Garden Centre – would serve the east of Horsham o Land at Buck Barn if associated with proposed large scale housing development in that location (to the east) o Land at Broomers Hill Business Park – Support and support an expansion of the employment site allocation to the west of the A29 o Rosier Commercial Centre – makes sense and the realistic way of dealing with sustainability of some businesses. The increased traffic will be an issue (A272 and A29 struggle at peak times). o Broadlands Business Campus o Land around Mercer Road <p>Rudgwick Preservation Society agreed with the policy and advised that the sites seem to be suitable if meeting sustainability and infrastructure criteria. They agreed with the key issues provided at the start of the Economic Development chapter.</p> <p><u>Site Promoters</u></p> <p>The site promoter for Broadlands Business Campus referred to a planning application for an additional office building submitted in February 2020. They supported allocation of their site, and Policy 6 for the following reasons:</p> <ul style="list-style-type: none"> - Support the clear and focussed direction of this strategic policy including the provision of sufficient employment land in District over the plan period. - Support the economic development and growth strategy of the Draft Local Plan - Support key aim of utilising existing skilled local labour force as well as seeking environmental improvements through the efficient operation of existing and new commercial development. <p>Chichester College Group supported the identified site at Brinsbury of 16,850sqm as existing commitment (in table after para 5.3). The Group supported the acknowledgement of the Brinsbury</p> | |

College as an important FE and the opportunities for additional education provision (para 5.5). Whilst their intentions are to ensure the long term educational needs are met within its own site, should the strategic allocation (Land at Adversane) be considered further into Regulation 19 stage as a preferred site, this could on its own and in addition to the Adversane site, provide an opportunity for any consolidation, or redevelopment within the boundary of the College site, to be brought forward in tandem with any development in the wider area over the 18 years. The Group noted the support the policy gives to the “expansion of higher education facilities in relation to research and development and employment training activity”. They would welcome clarity on where and how the requirements in the EGA will be achieved across the District and the role the College can play in this provision.

Landowners for Land South of Star Road Industrial Estate supported allocation of their site and welcomed the policy explaining that there has been an increase in commercial interest in this site from across the District and beyond. They explained that they are also discussing how to meet Huffwood Estate’s employment as the Draft Neighbourhood Plan seeks relocation to the site.

Those representing South West of Hop Oast Roundabout supported the allocation of all the sites but in particular their site and identified its benefits and limited constraints. They note proposed West of Southwater housing allocation would wrap around the site, which would be able to help address the respective employment needs.

In relation to North and South of Buck Barn, Knepp Castle Estate welcome Policy 6 and support the allocation of these sites – as standalone sites offering 12,000sqm employment floorspace (if increase in South site accepted). They also explained that:

- the District lacks high quality employment land and have seen interest and demand increasing for employment space.
- They welcomed the recognition to the need to enhance rural economy enabling diversification (eg employment and tourism).
- These sites are needed in their own right and should not be linked to the potential Strategic Housing Allocation (Weald Cross) and believe suitable access is achievable, , given the Estate own the surrounding land.
- Seek an extension to the west of the South site which they would develop before the North site. The explained the North site would look to implement a new traffic lighted access onto the A272 opposite the southern access and would have an internal road linking to Pondtail Farm Industrial Estate with access to A24 bus stop.

The promoters for Land South of Hillier Garden Centre stated that whilst they supported the allocation of the site for employment, suggest the site should be reconsidered for housing (C.100 units), the landowners preference, or mixed use scheme (employment and housing).

The promoters Land around Mercer Road felt that a small portion of the western side of the site would be suitable for employment, the rest of the site should be included as a housing allocation.

Parish and Neighbourhood Councils

Forest Neighbourhood Council supported the key issue relating to the need to retain and expand high quality offices, which is detailed at the start of the Economic Development chapter. They suggested putting pressure on Government to change the current legislation.

Horsham Trafalgar Neighbourhood Council stated agreement with the policy

Other Stakeholders

Horsham Labour Party supported the strategic policies set out in Chapter 5, but considered that to provide more local employment opportunities with fewer travel needs, there should be more encouragement of mixed land uses to expand the provision of A1, A2 and B1 uses in established residential areas.

Observations – Strategic Policy 6 Economic Growth and Chapter 5 Introduction

Number of Comments

43

Summary of Comments

Members of the Public and community groups

A number of individuals provided a number of observations relevant to Policy 6 and the introduction to Chapter 5. The following provides a summary of the observations made:

- Agree with most of the statements in the key issues detailed at the start of Chapter 5 but there is not a shortage of business floorspace but much of it is too expensive
- Loss of offices to residential has had negative impacts and should be avoided.
- Broadly support but consider there should be more encouragement for mixed use development in residential area to provide more local employment opportunities with fewer travel needs.
- If 40% of commuting destinations are beyond the District's boundary to the north then perhaps housing is needed further north to cut down on emissions/carbon footprint
- Some industries are constrained by access and increased road traffic.
- Infrastructure is needed to facilitate economic growth.
- High Speed Broadband / internet is patchy and must be a priority and included in the strategy to facilitate home working and save carbon, air pollution and congestions.
- Agree with recognition of Gatwick Diamond in supporting text but this should be reflected in policy
- Agree with context but this should be reconsidered given the impact of COVID-19 on local economy.
- Welcome one new job per one new home but recognise not all sites should deliver both but can co-locate or locate next to existing respective provision to sustain and grow settlements. Conversely, agreed with the policy but noted that this was not part of the offer at Rookwood.
- The district has had a lot of housing development compared to economic development, which is why such a high proportion commute.
- Whilst the Gatwick Diamond is of strategic economic importance to the District, the rural heritage should not be sacrificed and adversely impact rural communities.

Comments made on particular settlements included

- Billingshurst:
 - o The two new industrial developments near Billingshurst alongside the four existing, which are constrained, will increase use of private vehicles on the rural A272. Expansion of Rosier Commercial Centre should only be considered if the East of Billingshurst (Little Daux) does not go ahead as the A272 can't take both.
 - o Best location for business park / industrial estate is near a dual carriageway to facilitate lorries, not country lanes or past a Primary School due to low bridge as is the case in Billingshurst.
- Ashington:
 - o Lots of residential proposed but no employment sites on this list

- Horsham:
 - Blatchford Road South Side L-shape Industrial Estate (backing onto Plovers Road, Redwing Close and Harwood Road) should be allocated for housing instead of Rookwood, land north of Horsham and the existing businesses consulted about vacating/relocating.

Parish Councils

Horsham Denne Neighbourhood Council advised that development on Land Around Mercer Road, the Graylands Estate, and Broadlands Business Campus would add traffic issues close to the North of Horsham and Horsham Enterprise Park (Novartis) developments. They requested that the following are added to the glossary: employment categories, ICT Infrastructure, D1, D2, and all 'A' categories and suggest an internet link to the Proposals Map would be useful.

West Grinstead Parish Council raised the need for a political solution where employment is directed to the less populated north of England, to take pressure from the south.

Rusper Parish Council felt the presumption of growth of land use for economic and housing doesn't match with the more important principles of environmental quality and climate change or those of preserving the natural environment and district character. Instead of growth it should be a broader principle of intensified land use. COVID-19 must be reflected in the economy section, it has caused the greatest financial lump in living memory.

Rudgwick Parish Council asked about the role of HDC within Gatwick Diamond.

Statutory Consultees

Historic England advised the local plan might need to consider the inter-relationship of the objectives for the historic environment with the following issues of local importance in the draft Plan. In respect of Policy 6 they asked about how the plan might conserve and enhance the quality of the historic environment in order to encourage tourism, help create successful places for businesses to locate and attract inward investment and about opportunities for heritage-led regeneration.

They also questioned whether the policies in the plan are founded on an up to date evidence base that has informed the draft plan in respect of its implications for the heritage of the district and could not identify a heritage study

West Sussex County Council advise they cannot consider the Plan to be sound until the impact of housing and employment allocations is identified in scale and location and a transport strategy for sustainable transport (led) and highway solutions and committed to working with HDC

Crawley Borough Council expressed support for the provision of new employment floorspace where it is in sustainable locations. They stated recognition that the North West Sussex EGA identifies a need for additional business space in Horsham and supported the allocation of sites for flexible business use within the Local Plan which should ensure the delivery of a range of business uses to meet the identified need.

Where unmet needs of Crawley are being met as part of development adjacent to Crawley, the Council felt employment needs could be met off-site but very locally to the site on land within North Crawley Area Action Plan and also at Gatwick itself but raised concern with the ability to provide 1 job per home within strategic sites and how each site will support job growth at this level as it is unclear how this approach links back to the scenarios in the North West Sussex EGA.

CBC suggest a more flexible approach should be considered for delivering employment opportunities in sustainable locations. Further discussions are needed if land west of Crawley is allocated in relation to employment need, the current proposed consequential creation of 10,000 jobs, and to ensure Manor Royal and Crawley Town Centre is not undermined.

Natural England advised that in respect of the following sites policy provisions should be included to safeguard the adjacent Ancient Woodland from loss or damage in accordance with NE's advice:

- Land South of Star Road Industrial Estate, Partridge Green
- Graylands Estate, Langhurst Road, Horsham
- Broadlands Business Campus, Langhurst Road, Horsham
- Land South of Hilliers Garden Centre

They also advised that in respect of the following sites consideration must be given to the potential impacts from surface water and waste water on the Upper Arun SSSI, and the scope for mitigation:

- Land at Lower Broadbridge Farm, Broadbridge Heath
- Land South West of Hop Oast Roundabout

With regard to Land at Broomers Hill Business Park, Pulborough they explained that the same consideration must also be given to the Pulborough Brooks SSSIs and that HDC must also consider the potential impact on the functionally linked land associated with the Mens SAC and request regard be given to NE's Sussex Bat SAC protocol and South Downs National Park's Local Plan.

Site Promoters/Developers

A selection of site promoters made the following points:

- In relation to Land West of Kilnwood Vale whilst it will not deliver employment it can provide the types of homes needed by the local workforce within Crawley, Horsham and the Gatwick Diamond so that it can contribute positively towards the strategic economic objectives. On this basis, and to ensure the plan is justified and effective, the policy text should be amended to provide appropriate flexibility in respect of the larger sites.
- In relation to car showrooms the policy would be term them as 'employment generating'. Further clarification is required on this point either in the text or glossary and there must be flexibility for any site that is no longer commercially viable to be able to respond to changing circumstances and enable loss to alternative uses to ensure that wider social and economic benefits are considered. .
- With reference to North and south of Buck Barn Petrol Filling Station, there is an error in the write up as the strategic site 'Land at Buck Barn' is to the east not the west.

Object – Strategic Policy 6 Economic Growth and Chapter 5 Introduction

Number of Comments

73

Summary of Comments

Members of the Public and community groups

A number of individuals objected to the introductory text of Chapter 5 or raised general employment issues, these are summarised as follows:

- The section does not consider the impact of the pandemic and this should be addressed

- Residents do not want the area to be industrial, they choose to live here for its rural character
- The connection to London by rail is not speedy and development should be in places where commuting is easier
- Economic development will lead to loss of greenfield land – development should occur on brownfield land

Comments on the policy included:

- It should reference need to transition to a low carbon economy and tackle environmental issues.
- Employment development must be sustainably located in respect of existing and new settlements
- No employment sites highlighted in named settlements (Ashington, Henfield and others)
- Need a cohesive plan to move businesses to improved facilities in planned development and the reuse of old sites to meet the needs of other businesses.
- Avoid over development and limit expansion and infill for businesses until definite strategy is agreed and the precise needs are known.
- There is no definition of sustainable economic growth
- Need to define 'sustainable economic growth'
- Doesn't take into account remote working – lessening need for employment floorspace
- The first row should be deleted/changed to show how each strategic site would meet targets.
- There is no reference to high speed internet connection
- Existing sites should be encouraged to grow
- A greater number of sites should be allocated

Comments on particular sites included:

- Development on Land South of Hilliers Garden Centre ruin the character, landscape and amenity of the area, and ruin the 'country' entrance to the market town
- Land South of Star Road Industrial Estate:
 - o the site must not be viewed as a standalone employment allocation as it should be linked to the relocation of employment from adjacent Industrial / Trading Estates releasing them for housing. Otherwise the emerging West Grinstead Neighbourhood Plan will be undermined because a key component of its strategy is to build new homes on brownfield sites to see a gradual expansion of the village to the south.
 - o Do not develop as it lies next to sewage works and has young oak. Development would prevent expansion of the sewage works which may be required to serve additional housing More trees should be planted to mitigate Climate Change. There is spare capacity on Star Estate to relocate Huffwood Trading Estate.
- Land South West of Hop Oast Roundabout is not a suitable 'Employment Allocation' because it lies outside any BUAB and is subject to Countryside and Coalescence Policies.
- Objections were also raised to a site not listed, North of Hop Oast, west of the amenity site.

Sussex Wildlife Trust suggested an addition should be made by including an additional bullet point 9 which states "Requiring proposals to identify, maintain and enhance the existing biodiversity value and natural capital delivery of the allocated site prior to development."

Horsham District Cycling Forum wanted an additional bullet to read, “Requiring developments to contribute to sustainable transport links for employees, customers etc including good cycling and walking infrastructure.”

Woodland Trust objected to the allocation of sites which include ancient woodland and, in respect of sites adjacent ancient woodland requested a minimum buffer of 50m between development and the ancient woodland) unless a smaller buffer can be clearly justified. These sites were listed as:

- SA063 Land South of Star Trading Estate
- SA363 Graylands Estate
- SA568 Land around Mercer Road, Warnham Station
- SA570 Land South of Hilliers Garden Centre

Parish Council

Ashington Parish Council objected to a lack of employment to support potential large scale housing.

Broadbridge Heath Parish Council object to the inclusion of the Land at Lower Broadbridge Farm for the following reasons:

- It is an important area of green space on the perimeter of the already extensively developed village
- The environment policy within the plan contradicts by intent to conserve natural environment
- It was noted that the intended use of land would be for storage and distribution, industrial and offices.
- Development on this site pushes the green space(s) further away
- Broadbridge Heath would be in danger of becoming a large industrial park
- This would not provide benefit to the Parish, just negative impact
- Much of the local green space has already been developed.

Rusper Parish Council felt the economic collapse means the focus should be on support rather than growth and that the Plan should not prop up and encourage the business models that create pollution and claim more of the local environment. They viewed the site in Langhurstwood Road to be suitable for intensification but not expansion due to loss of green space and habitat and spread of pollution impacts and that new commercial units must provide electric vehicle charging points for staff and clients.

Thakeham Parish Council explained that the Plan’s vision states the strategy will provide jobs that “offer the opportunity of working closer to home” but that this is not the case for Thakeham.

Upper Beeding Parish Council raised the following points:

- There does not seem to be an attendant increase in employment and job opportunities resulting in more commuters and loss of community spirit.
- Large employers have left Horsham and have not be replaced
- There are large number of small employers but they are not going to be able to provide the numbers of jobs that have been lost or to accommodate the new residents.

West Grinstead Parish Council objected to the inclusion of Land South of Star Road Industrial Estate as a standalone site because it is a key component of a strategy in the emerging Neighbourhood Plan to build new homes on brownfield sites. This was via the relocation of businesses within Huffwood Trading Estate and the older units at the north end of Star Road to the

site so that they could be redeveloped for housing. They felt that there may be a net increase in commercial land but it should not be considered as a standalone site as this would undermine the Neighbourhood Plan.

Statutory Consultees

Natural England noted landscape considerations are included but advise Policy 6 should also include provision for biodiversity and should reflect a masterplanning approach ensures resilience which is of key importance for all development.

Developers/Site Promoters

Numerous comments were provided which included:

- The Economic Growth Assessment is incorrect as:
 - It understates the need for employment land as it applies past rates which have been constrained.
 - Supply of deliverable employment floorspace is overstated in the EGA as it does not factor losses to other uses
 - The forecast do not take into account Gatwick Airport or it's plans for substantial growth. The burden Gatwick Airport places on housing numbers and lack of infrastructure should be identified and highlighted clearly so that this can be seen as a major issue with the growth plans Gatwick is endeavouring to take forward.
 - New business growth numbers are questionable as it assumes many new businesses will be set up without providing evidence.
 - Firsland Park Industrial Estate between Henfield and Albourne is not mentioned even though it is supposed to form up-to-date, robust and comprehensive evidence base.
 - It has significant shortcomings and the approach in the plan relies heavily on commitments.
- Of the 6 sites listed 2 are for grade A office space at Horsham and of the 4 other sites only 'Land north of Hilland Farm' is being delivered within a short time frame. The table should be critically reviewed in respect delivery and a distinction must be drawn between sites which have commenced and then this should inform what land should be allocated.
- It is essential identified sites are in suitable locations, attractive to the market with genuine prospect that they will be delivered.
- A greater number of sites should be provided.
- The plan focuses on housing and only seeks the bare minimum employment growth rather than provide an exemplar example of wider strategic thinking
- The policy seeks to retain the status quo rather than being positive
- Crawley is not meeting needs and Horsham could help meet their unmet needs.

Homes England indicated broad support for Chapter 5 and that it supports the higher housing growth option, which in turn increases the employment requirements. Therefore, they felt it important for the final spatial strategy to support and respond to wider strategic economic development strategies within the functional economic areas. They supported in principle the requirement for strategic allocations to provide employment, however, seek an amendment to the policy to allow for these jobs to be in close proximity rather than within the site where an overriding case for offsite provision exists. For example, Manor Royal is in close proximity to the Land West of Crawley and is Crawley's principal business location and key to the Gatwick Diamond.

Comments were made because the sites were not included as potential allocations, this included:

- Land to the north of The Old Brickworks (2ha), Shoreham Road, Henfield (SA681) should be allocated and would be in accordance with the Neighbourhood
- Southgrounds, and the Old Kennels, Henfield should be included to accord with the Henfield Neighbourhood Plan
- SA035 Rear of Hollands Lane / West of the Downs Link should be allocated (on the premise that the current employment on Land South of Hollands Lane, Henfield, is relocated to the site so that it can deliver housing
- The promoters for Land at Kingsfold, Warnham (North West Horsham) objected to the omission of the business park expansion land offered by NW Horsham Estates as successful business parks must be allowed to develop critical mass and grow and expansions of existing business facilities are a normal policy position.
- Land to the South of A264 / East of Holmbush Farm adjoining Travis Perkins as it should be allocated or designated for a low environment impact, business-hub type site
- Land between Kilnwood Vale and Faygate as more land should be released for employment in this area to address the shortfall in the supply of employment West of Crawley recognised in the EGA Update.
- Land between McVeigh Parker Yard and Wadeys Builders Yard, Andrews Hill Stane Street, Billingshurst should be allocated and promoted for starter units between two existing businesses to the south and north and this would complement the Billingshurst Neighbourhood Plan.
- Land at Westons Farm, Warnham should be allocated for employment and D1 uses to help meet the short, medium and long term needs.
- Land at Maydwell Avenue should be allocated for employment and would be an extension of the existing designated Key Employment Area. The site has few constraints and a nearby KEA is thriving and needs opportunities to expand

A number of comments were made for allocation of mixed use sites including at:

- Toat Café and Lorry Park, Stane Street & Land at Whitelands Farm, Blackgate Lane
- Land at St Andrews Farm, Stane Street, Billingshurst
- Land at Hilland Farm, Billingshurst
- Units 4-6 Redkiln Close, Horsham

Policy 7

| Support - Strategic Policy 7 Employment Development | |
|--|----|
| Number of Comments | 13 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Comments included:</p> <ul style="list-style-type: none"> - Provided the business need is there the plan makes sense. Sustainable businesses are required with a long term view, there should be less speculative commercial development. - Support the approach to protect the existing key employment areas. - Support the positive and flexible stance towards work required to upgrade, refurbish and reconfigure existing sites and importantly the support for expansion where needed. <p><u>Parish Council</u></p> <p>Broadbridge Heath Parish Council support the designation of Lawson Hunt Industrial Park as a KEA because it offers a good contribution to local employment, alongside Tesco and the leisure centre.</p> <p>Forest Neighbourhood Council supported a need to retain and expand high quality offices.</p> <p>Horsham Trafalgar Neighbourhood Council agreed with the policy</p> <p>Washington Parish Council noted the policy ranks Rock Business Park in the parish as a key employment area. The Storrington & Sullington and Washington Neighbourhood Plan supports the protection and enhancement of employment locally, and the Council agrees that any expansion of this site should be appropriate to its rural location.</p> <p><u>Developers/Site Promoters</u></p> <p>Comments included:</p> <ul style="list-style-type: none"> - Support the upgrading, refurbishment and expansion of employment estates / premises but suggest there should also be allowances for replacement units of inefficient buildings to provide floorspace that better meets local needs and allows them to be aligned with current building, workplace and energy standards. - Support, in particular the provision of new employment sites in locations such as Pulborough. <p>The site owner of Broadlands Business Campus supports the designation of the campus as a KEA and the positive direction of the policy in creating a presumption in favour of expansion of such sites based on a balanced planning judgement.</p> <p>The site owner of Mackley Industrial Estate supports the designation of the estate as a KEA. However, they seek an amendment to include the open storage area (B8 Use Class) to the south, that lies within the Built Up Area Boundary, within the KEA. As noted in the plan, around 40% of residents commute out of the District and this can lead to unsustainable patterns of movement. The inclusion of the land to the south will make an additional 1.1ha available for employment space, a significant contribution towards the needs. The KEA with the land to the south is included as an employment site in the Upper Beeding Neighbourhood Plan.</p> | |

Observations – Strategic Policy 7 Employment Development

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|--|-----------|
| Number of Comments | 11 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Comments made included:</p> <ul style="list-style-type: none"> - COVID-19 has led to many people working from home so need for office space may be greatly reduced and could be used for residential. Must review the surveys done pre-virus. - Loss of offices to residential has affected this area of employment and should be avoided in future to maintain employment close to homes. - If 40% of commuting destinations are beyond the District's boundary to the north then perhaps housing is needed further north to cut down on emissions / carbon footprint - Absentee Business Landlords / Landlord Freeholder Companies sometime impose unrealistically high business rents on small independent local businesses, forcing bankruptcy or closure. - Billingshurst Sites: <ul style="list-style-type: none"> o the new sites at Hilland Farm and Platts Roundabout were in part permitted to encourage the existing industry to move to the outskirts of the village mitigating the volume of HGVs on residential / school road. The Plan should acknowledge this and the implications for the existing estates in the village to move to lighter use or provide residential. o The two new industrial developments near Billingshurst alongside the four existing, which are constrained, will increase use of private vehicles on the rural A272. Expansion of Rosier Commercial Centre should only be considered if the East of Billingshurst (Little Daux) does not go ahead as the A272 can't take both. - Wiston Business Park and Rock Business Park are located on the A24 but are not well linked to settlements and are entirely reliant upon access by private car. <p>The Steyning Society wanted inclusion of recognition of home working and the impact this could have on residential areas in terms of additional small-scale accommodation, parking and internet infrastructure.</p> <p><u>Statutory Consultees</u></p> <p>Highways England stated the policy needs to provide guidance on B8 use in relation to parcel distribution as such businesses tend to generate significantly more road based trips than those traditionally associated with B8 uses. An allowance for such must be made in the Transport Assessment if the associated policy does not give appropriate guidance to restrict such use.</p> <p>South Downs National Park Authority explained the need for local facilities in SP7 and P8 will involve communities that cross boundaries with the SDNP and there is an opportunity to work together to support those communities.</p> <p>Natural England advised that in respect of the following sites policy provisions should be included to safeguard the adjacent Ancient Woodland from loss or damage in accordance with NE's advice:</p> <ul style="list-style-type: none"> - Graylands Estate, Langhurst Road, Horsham - Broadlands Business Campus, Langhurst Road, Horsham - Henfield Business Park, Shoreham Road, Henfield - North Heath Lane Industrial Estate, North Heath Lane, Horsham - The Business Park, Maydwell, Slinfold - Huffwood Trading Estate, and Star Road Partridge Green | |

They also advised that 'Station Approach, Pulborough' must consider potential impacts from surface water and waste water on the Pulborough Brooks SSSI, and the scope for mitigation.

Object – Strategic Policy 7 Employment Development

Number of Comments

28

Summary of Comments

Members of the Public and community groups

Comments received included:

- Economic development should be designed to encourage green agenda
- The Mackley Estate, Henfield Business Park, and Cowfold Business Park are the nearest employment opportunities to Henfield but have a poor bus service which therefore requires travel by car affecting air pollution.
- Existing Trade and Industrial Estates should be reclassified to B1(a) or B1(b) Use Class where new residential development isolates them, which will mitigate the volume and size of vehicles on the residential roads. New Trading and Industrial Estates should preferably be promoted on the perimeter of towns to prevent heavy traffic in residential areas. The employment development strategy should align with existing and future housing provision.
- The policy should consider that other uses such as gyms, cafes etc, can assist with the function, quality and viability of key employment sites not just other existing employment sites.
- COVID-19 has changed the way people shop and work. The demand for commercial office space and retail shops has reduced as people will continue to work from home / shop on-line, the premises should be converted into residential.

Horsham Society requested the following be added "All existing employment sites will be protected with a presumption of refusal for change of use away from employment A, B, D, C1, or C2, including a presumption of refusal of Permitted Development in these cases."

Parish Councils

Billingshurst Parish Council noted that the policy proposes to safeguard Huffwood and Eagle Trading Estates, Daux Road Industrial Estate, and Gillmans Industrial Estate as Key Employment Areas (KEA). The Neighbourhood Plan consultation responses highlight a desire to move industrial estates from the village centre to the peripheral, more accessible sites especially for HGVs. The policy should be amended to permit change where the community actively supports change. The proposed policy should permit intensification of existing use; encourage small or home-working/ based businesses; reference the area for the tourism economy; aim to encourage sustainable local employment growth through Neighbourhood Development Plans; and encourage expansion of higher education facilities for R&D and employment training.

Site Promoter/Developers

The following comments were made in relation to particular sites:

- Henfield Business Park is full with no additional capacity. All the sites listed should be visited and capacity assessment undertaken
- Huffwood Trading Estate, Partridge Green should relate to the Neighbourhood Plan which proposes to allocate this trading estate for housing and the relocation of the businesses to the Star Industrial Estate / South of the Star Industrial Estate.

- Billingshurst Sites (Huffwood and Eagle Trading Estates, Daux Road Industrial Estate, and Gillmans Industrial Estate):
 - are becoming surrounded by residential generating heavy vehicular traffic on, and incompatible with, the residential roads. They should be reclassified to B1(a) or B1(b) Use Class.
 - Promoter of employment at Hilland Farm suggests these estates should be downgraded and treated as 'Existing Employment Areas' providing greater flexibility for change of use / redevelopment. Employment at Hilland Farm can provide the impetus and facilitate the relocation of businesses to better quality accommodation in less constrained location at the edge of Billingshurst, an approach supported by the community in response to the Billingshurst Neighbourhood Plan.
- Rock Business Park (1.72ha, B1 & B8 Use Classes) – is an existing employment site and proposed Key Employment Area (KEA). The site specifically supplies much needed space within the Horsham region for SME's, of which there is an undersupply and we envisage the current employment use (B1 & B8) to be retained for the foreseeable future. However, it was felt that there should be support for alternative uses

Objections were raised because the following sites were not included as KEA:

- Land at The Old Brickworks, Shoreham Road, Henfield
- Hollands Lane Industrial Site, Henfield
- Southgrounds, and the Old Kennels, Henfield
- Firsland Park Industrial Estate, Henfield Road, Albourne

Policy 8

| Support – Policy 8 Rural Economic Development | |
|---|---|
| Number of Comments | 5 |
| Summary of Comments <u>Members of the Public and community groups</u> A number of individuals either supported or showed some support for Policy 8. They indicated support for the following reasons: <ul style="list-style-type: none"> - Support local farming both arable and grazing. - The rural economy is of strategic importance, especially in light of the aviation industry shrinking. - Support because it will allow farmers and landowners to further diversify the facilities they are able to offer to help maintain the viability of their rural businesses. <p>Sussex Wildlife Trust supported the recognition for biodiversity and the need to enhance it.</p> <p>The British Horse Society advise the equestrian industry makes a significant contribution to the rural economy, so the wording "promote recreation in and the enjoyment of the countryside" is supported.</p> <u>Parish Councils and Neighbourhood Councils</u> Rudgwick Parish Council broadly agreed and supported the policy and agreed that rural areas can support employment whether at home or in purpose-built buildings. They did feel such development should be permitted on narrow country lanes. They explained that 'urbanisation of the countryside' was feedback in the production of their Neighbourhood Plan. They outlined support for the expansion of home-based businesses 'near home' referenced in para 5.16, and the reference to Neighbourhood Planning in para 5.19. They supported the parking requirement in the policy but query how development will make a contribution to diverse and sustainable farming enterprises. | |

| Observations – Policy 8 Rural Economic Development | |
|---|----|
| Number of Comments | 10 |
| Summary of Comments <u>Members of the Public and community groups</u> A number of individuals raised observations in respect of Policy 8 or are considered to be observations relevant to the policy. The key reasons are as follows: <ul style="list-style-type: none"> - Development within the rural area should take into account the need for improved roads and cycle lanes as well as public transport and the nature of the area. - Sustainable development includes protection of arable and grazing land in order to feed local population. - There should be an increased focus on brownfield sites within existing urban areas. Developments should be smaller in scale and distributed throughout the area not concentrated on a few settlements. - Conflicts with Policy 3 which should be amended to reflect policy 8 to ensure rural economic development is not constrained to built up area boundaries or allocations. Such enterprise should be encouraged not stifled. <u>Statutory Consultees</u> | |

South Downs National Park Authority noted the opportunity to work with the Council to deliver the aims of the policy.

High Weald AONB Partnership recommended the addition of the following criterion:
 “In the High Weald AONB any proposed development within or adjacent to a farmstead shall be accompanied by a robust assessment of the character, history and function of that farmstead, its significance and its sensitivity to change, and demonstrate how this has been taken into account in the design of the proposal”.

Object – Policy 8 Rural Economic Development

Number of Comments

22

Summary of Comments

Members of the Public and community groups

A number of individuals raised objections to the policy, these are summarised as follows:

- The wording is too vague. More specific definitions of what is and is not acceptable should be provided.
- The allocation of strategic sites for housing/ distribution of housing at certain location conflicts with the policy
- High speed internet is needed for successful rural businesses

The British Horse Society requested acknowledgement be given in Policy or supporting text to the importance and benefits of a connected, strategic, multi-use (bridleway) network of public rights of way to the rural economy. PRoW provide safety for non-motorised uses (NMUs) especially in rural areas. The West Sussex Access Forum commented similarly.

Parish Councils

Thakeham Parish Council objected as:

- they felt the policy would seriously undermine Policy 28 Countryside Protection as the penultimate paragraph enables the local impacts to be overlooked as only the wider area is referenced and biodiversity enhancements appear as optional.
- the end of the paragraph should be amended after ‘countryside’ to read ‘and the location in question, and must seek to enhance biodiversity in and around the site.
- unless the policy is strengthened to focus on avoidance of impact on the ‘immediate locality’ of proposals it will conflict with Policy 32 which is strongly supported.

Statutory Consultee

Natural England said that visual amenity is also a key consideration with rural development and recommend the policy be amended to read as follows “Outside built-up area boundaries or secondary settlements, development, which maintains the quality and character and enhances the biodiversity of the area whilst sustaining its varied and productive social and economic activity, will be supported in principle.”

Developers/Site Promoters

Comments were made that included:

- Third Sentence of Policy:
 - o The policy should be amended to accord with para 83 of the NPPF and to ensure the positive re-use of buildings is not unduly restricted. The word “must” in the

third sentence should be amended to read “should, where possible”. Without the amendment it contradicts the latter part of the policy relating to the re-use of buildings for tourism etc.

- The Policy appears to conflict with Policy 7(7) and needs to be amended because existing established industrial estates in rural locations are unable to “contribute to the diverse and sustainable farming enterprises within the District”. Large established industrial estates need the support of policy to continue and expand and to allow for the continual renewal and replacement of existing buildings to meet modern legislative requirements and needs of commercial occupiers. (raised by Firsland Park Industrial Estate ID /5953)
- Criterion 2 of Policy:
 - Is unduly onerous and contrary to para 83 of the NPPF which promotes growth and expansion of all types of business in rural areas through conversion or ‘well-designed new buildings’. The latter should therefore be supported and included in the policy. Rural economic growth should not be unduly restricted to where it supports ‘balanced living and working communities’.
- Include the following criterion “... or; The development proposals are part of a Whole Estate Plan that has been endorsed by the Local Planning Authority.” With regard given to Wiston Estate whole Estate Plan which has been endorsed by the SDNPA and sets out plans for North Farm.

Policy approach welcomed particularly the removal of reference to new buildings being required to make a ‘substantial improvement’ to setting which accords the NPPF. It should however be amended to recognise the importance of rural Estates such as Knepp Castle Estate in providing contribution to the District’s rural economy.

Policy 9

| Support – Policy 9 Conversion of Agricultural and Rural Buildings to Commercial, Community and Residential Uses | |
|--|----------|
| Number of Comments | 6 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>A number of individuals support provided general support to the policy. One comment received suggested that the first three criteria are considered suitable to control unwanted development.</p> <p>A number of supportive comments did however suggest:</p> <ul style="list-style-type: none"> - Criterion 4 should be removed as decision should be based on evidence, not the lack of desire for a rural building. - Criterion 7 could be expanded to include what type of community uses the Council would consider favourably - Whether this policy could be expanded to include other needs for example self and custom build <p>Rudgwick Preservation Society expressed support and was pleased to see reference to good accessibility, along with the requirement to assimilate into the immediate environment.</p> | |
| <u>Other Stakeholders</u> | |
| <p>Horsham Labour Party expressed support, but consider that to provide more local employment opportunities with fewer travel needs, there should be more encouragement of mixed land uses to expand the provision of A1, A2 and B1 uses in established residential areas.</p> <p>The British Horse Society highlights that equestrian businesses are important to the rural economy and is pleased to see that this is acknowledged in paragraph 5.20.</p> | |

| Observation – Policy 9 Conversion of Agricultural and Rural Buildings to Commercial, Community and Residential Uses | |
|---|-----------|
| Number of Comments | 10 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>General comments made included:</p> <ul style="list-style-type: none"> - Consideration will also need to be given to supporting infrastructure such as medical facilities, schools and shops and environmental impact of residential use - Agricultural buildings should only be converted into dwellings that support an agricultural, equestrian or other countryside use - Need to ensure the use of the building is sustainable and should be accessible by modes of transport other than private vehicle - All sites should be assessed for environmental archaeological, health and air quality concerns | |

- The increased flexibility with regards to the provision of rural housing, irrespective of the Five Year Housing Land Supply is welcomed.
- The reduced emphasis on proximity to facilities and bus stops is welcomed, particularly as commercial vehicle movements are less acceptable than domestic.

Site Promoters/Developers

The following observations with regards to Policy 9 were made:

- Criterion 1 would prevent the re-use of buildings used for agricultural purposes or other uses and the NPPF does not specify any time period
- Criterion 4 does not comply with the guidance in the NPPF in relation to the re-use of rural buildings in the countryside
- The policy does not provide for the renovation and re-use of non-designated heritage assets

Other Stakeholders

High Weald AONB Partnership acknowledged that the High Weald Area of Outstanding Natural Beauty (AONB) is characterised by a high density of historic farmsteads and re-use of such buildings must be based on an understanding of their character, function, significance and capacity for change. Therefore an additional criterion is proposed: *“In the High Weald AONB any proposed development within or adjacent to a farmstead shall be accompanied by a robust assessment of the character, history and function of that farmstead, its significance and its sensitivity to change, and demonstrate how this has been taken into account in the design of the proposal”.*

Object – Policy 9 Conversion of Agricultural and Rural Buildings to Commercial, Community and Residential Uses

Number of Comments

30

Summary of Comments

Members of the Public and community groups

A number of individuals made comments on Policy 9, citing the following issues:

- The proposals in Policy 9 should make clear the relationship with Class Q and need to be fully consistent with its requirements
- The Policy should require that an application for prior approval shows provision of essential utilities to the location and there are no adverse effects e.g. demand on emergency services, access to local facilities
- A useful technical guidance note which might be helpful is provided by Herefordshire Council on the conversion of agricultural buildings to dwellings under permitted development
- Development of old sites into new carbon neutral facilities will attract new business
- High speed broadband is vital to support new and present rural businesses
- Policy does not make is clear whether it applies to Prior Approval or full planning applications
- The policy wording needs to be tightened to avoid unwanted development in the countryside as a result of loophole securing of ‘conversion rights’
- The policy is welcome but it is unclear and if it is intended to apply to full planning applications, then the sustainability of isolated dwellings should be given more emphasis
- Lack of relevance to the proposal

Horsham Society considered that the period of marketing should be extended from 12 months to 24 months as it does not allow for changes in the economy or national policy. It is also suggested that the following sentence should be added *“in the first instance heritage assets should be refurbished or repurposed and there will be a presumption of refusal against demolition.”*

Parish Councils

Forest Neighbourhood Council considers that criterion 3 regarding metalled roads needs qualifying, given the nature and condition of Horsham’s rural roads which are unsuitable for HGVs and coaches e.g. Hammerpond Road.

Nuthurst Parish Council suggested an additional criterion should be added to the Policy *“Agricultural and rural buildings should only be considered for conversion to residential use when the building is no longer needed for an agricultural/equestrian use and the resultant dwelling is needed to support an agricultural or a countryside activity.”*

Thakeham Parish Council objected to the policy and expressed that it would undermine Policy 28 Countryside Protection, stating that:

- The Policy in its current form will facilitate the conversion of agricultural buildings in isolated countryside settings to open-market housing and commercial uses inappropriate to locations, which the Parish Council fundamentally disagrees.
- It runs counter to Thakeham Neighbourhood Plan Policy 9
- The Policy will enable more people, activity and vehicles in isolated rural locations
- The Policy is unnecessary and has potential to cause confusion, particularly as such conversion can come through Class Q permitted development
- The Parish Council seeks the removal of all reference to residential units from this Policy
- Additional amendments to the wording are also required, including reference to an appropriate countryside location
- Criterion 2 should include a reference to avoid substantial demolition as well as reconstruction
- Criterion 5 requires greater specificity including that the proposals *“should not result in a significant increase in the existing building footprint or height.”*
- Criterion 6 suffers the same weakness as Policy 8 and should be tightened

Statutory Consultees

Natural England welcomed the policy wording regarding the need to maintain landscape character, but visual amenity is also a key consideration with conversion of rural buildings. Although paragraph 5.22 is welcomed, Natural England advise that the requirement to ascertain the presence and provide enhancements for bats and other key species should also be included in the policy wording.

Site Promoters/Developers

Comments included:

- Whilst supportive of guidance for the conversion of rural buildings, this policy inflexible and not effective in reality
- The policy assumes that all rural buildings are commercial and criteria 3 and 6 should be reviewed
- The requirements for 10 years of commercial use is excessive

- The marketing requirements in criterion 4 are too onerous and is inconsistent with the NPPF
- Conversion to commercial buildings often require extensive work, therefore marketing without the required change of use to meet this test would be a nonsense
- The Council could include a requirement for a building to be erected for 4 years to avoid buildings being built for later conversion if required
- More flexibility is required to take account of other material considerations e.g. change of use of land in the surrounding area or viability
- Lack of clarity on how the limit to 5 residential units has been reached
- The residential limit could restrict opportunities and the ambiguity of the wording could result in multiple planning applications being lodged
- Equine use should also be acknowledged in Policy 9 in order to establish a clear policy approach to alternative uses.
- Policy 46(a) would be contrary to Policy 9 which allows for conversion of rural buildings for community purposes without specifying location
- Lack of clarity over whether a community use would need to undergo a period of marketing
- The NPPF does not prioritise commercial uses over residential uses
- As the housing numbers have increased in the District, rural conversion schemes can help meet those needs
- The equivalent policy in neighbouring Mole Valley (Policy RUD19) strikes a sensible balance
- Similar tests within other councils (e.g. Chichester) have seen buildings fall into further decay
- The policy fails to consider traditional buildings
- Criterion 3 requiring that the site is served by an existing metalled road or other suitable access would preclude many redundant agricultural buildings and it is recommended that the Council reconsiders the restrictive nature of this wording
- Criterion 7 conflicts with the current wording of Policy 8 which restricts opportunities to contribute to 'sustainable farming enterprises'

Other Stakeholders

Greening Steyning / South East Climate Alliance considers that Chapter 5 (Economic Development) of the Plan should be reframed to take account of the new economic development context created by the transition to a low carbon economy

Sussex Wildlife Trust was pleased to see the recognition of the potential impact on biodiversity within the supporting text (paragraph 5.22), however, the wording does not adequately reflect the mitigation hierarchy which stipulates avoiding impacts as the first step and the following wording is recommended: *"5.22 Given the rural location of these sites, applicants would need to be mindful of the potential impact of any proposal on biodiversity. Rural buildings may, for example, contain bat roosts or nest habitats for protected species such as barn owls. Applicants should therefore be aware that it might be necessary to undertake an ecological **surveys** investigation to **ensure that they inform the need to and implement the mitigation hierarchy. This will require impacts to be avoided. If they cannot be avoided suitable mitigation will be required and as a last resort like for like compensation. Further to this there will be a need to deliver as well as biodiversity enhancements/net gain in accordance with the Council's biodiversity policies.**"*

Policy 10

| Support – Policy 10 Equestrian Development | |
|---|---|
| Number of Comments | 2 |
| Summary of Comments <u>Members of the Public and community groups</u> There were a couple of comments in support of the policy, though the reasons for this was not explained. | |

| Observation – Policy 10 Equestrian Development | |
|---|---|
| Number of Comments | 8 |
| Summary of Comments <u>Members of the Public and community groups</u> Comments included: <ul style="list-style-type: none"> - There is a shortage of safe riding areas in the district. Thought should be given to safe riding areas, away from traffic, even if these have to be multi- use with cyclists and walkers. - Bridleways are poorly maintained and many cross big main roads which is not acceptable. Footpaths should be accessible to equestrians to provide a much better network for them. Improve bridleways and focus on accessing some footpaths to equestrians to improve riding in some areas. - Equestrian related development does not enhance or protect the natural environment. This is due to the large-scale nature of many stables who over-graze their land, do not allow growth of hedgerows, and over-use and therefore damage the bridleways causing problems for other users. British Horse Society commented that: <ul style="list-style-type: none"> - the bridleway network is fragmented, roads used as links are becoming dangerously busy.: - Policy 10, bullet point 3, is a problem, as there is at present no strategic bridleway network, and the roads used as links in the network, or that have to be crossed, are becoming more dangerous and unsafe for NMUs due to the increasing vehicle numbers generated by new housing development. Planners need to ensure that opportunities provided by development for safe off-road links in the bridleway network are secured. Rudgwick Preservation Society commented that they had Concerns that equestrian development can be of a scale which is inappropriate, can include light pollution, and can be set away from existing buildings. The requirements of equestrian premises sometimes conflict with the protection of the countryside, with a unique mix of buildings and sand schools and lighting. These are sometimes inappropriately sited. Just because that is where the operator lives, permission is granted. Strict policy requirements are needed to protect the countryside. | |

| Object – Policy 10 Equestrian Development | |
|--|---|
| Number of Comments | 2 |
| Summary of Comments <u>Members of the Public</u> | |

A comment was made that all business development must have an element of tackling environment issues and that all new facilities must be carbon neutral.

Statutory Consultees

Natural England commented that equestrian development can have highly deleterious landscape and visual impacts, the special qualities of nationally significant landscapes as well as biodiversity. They explained equestrian development must be appropriate in nature and scale and that it can be demonstrated that these impacts can be avoided. They advised that the policy wording is revised to include this and that this is explained in the supporting text.

Policy 11

| Support – Policy 11 (Tourism Facilities and Visitor Accommodation) | |
|--|-----------|
| Number of Comments | 10 |
| Summary of Comments | |
| <p><u>Members of the public and community groups</u></p> <p>Comments expressed included agreement that historic buildings should be retained</p> | |
| <p><u>Other consultees</u></p> <p>The Knepp Castle Estate welcomed the policy approach and noted the important role that visitor economy plays.</p> <p>Rudgwick Preservation Society was supportive of the policy, agreeing that tourism is of great value and should be encouraged if it does not have negative impacts.</p> <p>Horsham Labour Party identified broad support for policies relating to economic development</p> | |
| <p><u>Parish Councils</u></p> <p>Horsham Trafalgar Neighbourhood Council identified support for the policy but were of the opinion that Horsham Drill Hall should be referred to in the supporting text, as should Horsham’s heritage in brewing and viticulture.</p> <p>Shermanbury Parish Council supported the policy, noting opportunities to increase and support tourist attractions but warned that urbanisation must not curtail such potential.</p> | |
| <p><u>Statutory Consultees</u></p> <p>The SDNPA noted the support for local visitor accommodation and identified that they were keen to work together on such matters.</p> <p>Natural England supported improving green modes of transport to visitor facilities and advised that this should link to a green infrastructure strategy and would welcome working with the council on green infrastructure initiatives.</p> | |

| Observation – Policy 11 (Tourism Facilities and Visitor Accommodation) | |
|--|----------|
| Number of Comments | 6 |
| Summary of Comments | |
| <p><u>Members of the public and community groups</u></p> <p>Comments expressed included:</p> <ul style="list-style-type: none"> - Further focus on Horsham’s brand and conservation status would attract more tourists - While visitor accommodation is important, losing homes for Air BnB properties should be resisted - Rookwood could become a tourist attraction if not viable as a golf course with an enhanced nature reserve and an eco-hotel. - Gatwick Local Nature Reserve could be created and become a tourist attraction. - The High Weald AONB Management Plan should be included in the evidence base to support this policy. - New tourist attractions should be added into the supporting text. | |

Other consultees

The Horsham District Cycling Forum commented that realising the potential of the Downslink (by improving the surfacing) could cause cycle tourism to grow.

The West Sussex Access Forum stated that well connected public rights of way would contribute to tourism.

Parish Councils

Rudgwick Parish Council identified potential tension between rural tourism and the environment (e.g. zip wires).

Objection – Policy 11 (Tourism Facilities and Visitor Accommodation)

| | |
|---------------------------|----------|
| Number of Comments | 6 |
|---------------------------|----------|

Summary of Comments

Members of the public and community groups

Comments included:

- The Loss of golf courses would impact upon tourism
- New tourist facilities should be carbon neutral
- The tourist economy is car based and the policy should seek to address this, including by more cycling and pedestrian routes
- There should be a presumption against any development that damage/degrade tourist attractions and in the first instance assets should be refurbished or repurposed.

Other consultees

The British Horse Society commented that there was no mention of informal recreation/public rights of way and the benefits they bring for tourism.

Parish Councils

Thakeham Parish Council opposed the conversion of non-residential development for visitor accommodation on the grounds that this would add more people and activity in isolated rural areas, causing environmental impacts. They suggested caveats need to be included in the policy to prevent this.

Forest Neighbourhood Council, while welcoming support for tourism in general, felt that it should not be prioritised over the rural environment. They also recommended the word 'we' being changed to 'HDC' in the supporting text.

Site promoters

Comments from those representing development interests included:

- In relation to point 3, it may not always be plausible to increase accessibility through sustainable modes of transport when some tourist attractions are remote in nature
- part b. of the policy was not supportive of growth for all types of rural businesses
- part b. could be amended to encourage visitor attractions that improve landscape
- the final paragraph was too stringent as the reuse of a building last in use as a tourist facility for business use could generate revenue for the economy.

Policy 12

| Support – Policy 12: Retail Hierarchy and Town Centres First principles | |
|--|----|
| Number of Comments | 14 |
| <p>Summary of Comments</p> <p><u>Members of the public and community groups</u></p> <p>Comments were made by individuals referring to the following:</p> <ul style="list-style-type: none"> - Support the designation of Henfield as a Secondary Retail Centre - Recognising the need to protect retail uses in town and village centres while preventing vacant premises. <p>Rudgwick Preservation Society and Horsham Labour Party broadly supported the policy.</p> <p><u>Parish Councils</u></p> <p>Horsham Trafalgar Neighbourhood Council supported the policy.</p> <p><u>Site Promoters</u></p> <p>Our Place, promoting Land at Adversane, supported the policy, noting their aim to provide top up retail facilities to meet everyday requirements within any potential future development without compromising the vitality and viability of existing retail centres in the district, particularly in Horsham and Billingshurst.</p> | |

| Observation – Policy 12: Retail Hierarchy and Town Centres First principles | |
|--|----|
| Number of Comments | 30 |
| <p>Summary of Comments</p> <p><u>Members of the public and community groups</u></p> <ul style="list-style-type: none"> - Local and village retail centres need to be promoted to ensure facilities are sufficient to meet existing needs and those generated by development. - Secondary Centres will be impacted by smaller scale development around nearby medium and smaller villages. - Development on larger strategic sites proposed have potential to destroy existing secondary and local centres (Billingshurst and Henfield mentioned specifically) - If development comes forward in Ashington it should be added to the list of Secondary Centres. Additional housing should be supported by plans to improve the selection of facilities and services in the village. - Quality of retail units available to rent, including range of sizes of units, needs consideration - Accessibility, including parking, needs to be considered - Sustainability of existing and new centres needs to be considered, including the potential for more local produce and for centres to follow 'transition network' principles - The Council should not permit out of town shopping centres due to reliance on car and detriment to town centre - Policy should be flexible in order to ensure there are no empty retail units as shopping habits change - Development closer to Crawley would be more acceptable due to the lack of retail choice for young people. Night-time economy should be encouraged following success of Piries Place redevelopment. <p>The need for Retail Impact Assessments to be carried out in relation to large scale development near medium and smaller villages was highlighted.</p> | |

Wimblehurst Road Residents Association commented on the need for community facilities to be located in town centres and not in peripheral locations.

Parish Councils

Forest Neighbourhood Council suggested parking policies in the town centre could be reviewed to encourage casual access to shops. They also pointed out ambiguity in the reference to the proposal map and suggested a page number reference be added.

Thakeham Parish Council highlighted a possible conflict between rural development and Town Centre First approach without improvements to sustainable transport options between rural and urban areas

Site Promoters

Promoters of Land West of Worthing Road pointed out a formatting issues with the table leading to confusing as to which settlements were considered primary and secondary.

Object – Policy 12: Retail Hierarchy and Town Centres First principles

Number of Comments

17

Summary of Comments

Members of the public and community groups

Locals Against Mayfield Building Sprawl (LAMBS) highlighted that the Mayfield proposal would be in direct conflict with the policy by undermining the success of Henfield's retail centre

Individual comments referred to the following:

- There has been a decline in the offer in Horsham Town Centre with reduction in range of retail outlets and increase in cafes and coffee shops
- Where large amount of development is proposed (i.e. Ashington) this should be reflected in their positioning within the Retail Hierarchy.
- The way retail centres are used, following Covid-19, has changed and the policy should reflect this.
- The conversion of vacant retail and office units within town centres to residential uses should be promoted.
- Carbon neutral development must be promoted within town centres.
- The need to allow town centre and employment uses in predominantly residential areas to reduce the need to travel

A number of comments objected to the classification of Billingshurst and Henfield as Primary Retail Centres following an error in the formatting of table which should have listed these under Secondary Centres.

Parish Councils

West Grinstead Parish Council highlighted the discrepancy between Partridge Green's classification as a Larger Village in Policy 2 and its exclusion from the list of Primary and Secondary Centres in this policy.

Billingshurst Parish Council challenged the classification of Billingshurst as a Primary Retail Centre.

Rusper Parish Council emphasised the need for policies to encourage strong local economies.

Site Promoters

The promoters of Land North and South of Hilland Farm objected to the inclusion of a floorspace threshold for impact assessments.

Statutory Consultees

Crawley Borough Council suggested the addition of wording which would require proposals to consider their impact on neighbouring retail centres.

Policy 13

| Support – Policy 13: Town Centre Uses | |
|---|---|
| Number of Comments | 8 |
| Summary of Comments <u>Members of the public and community groups</u> Individual commenters were supportive of the intention to maintain a focus on retail in town and village centres while maintaining flexibility in order to avoid vacant units. Wimblehurst Road Residents Association highlighted the need for affordable rents in town centres to encourage retail uses in the first instance and to avoid vacant units. Rudgwick Preservation Society and Horsham Labour Part expressed support for the policy. <u>Parish Councils</u> Thakeham Parish Council support the direction of retail to defined village centres. <u>Site Promoters</u> Our Place, promoting Land at Adversane, support the policy, noting their aim to reflect this by providing top up retail facilities to meet everyday requirements within any potential future development. | |
| HDC Response to comments raised <i>Comments of support noted.</i> | |

| Observation – Policy 13: Town Centre Uses | |
|---|----|
| Number of Comments | 13 |
| Summary of Comments <u>Members of the public and community groups</u> Individuals commented on the following: <ul style="list-style-type: none"> - The need for uses aimed at young people - The success of the Piries Place redevelopment, and the need to build on this success by encouraging the night-time economy - Concern over the number of empty retail units in some settlements in the district - The lack of existing facilities to support new development proposed for Horsham Town - The need to consider access to adequate parking provision to support retail centres - Covid-19 having highlighted the need for local shopping areas and the importance of creating resilience - The importance of balancing a focus on retail with the need to be flexible and responsive to changes in footfall and the way centres are used – vacant units should be kept to a minimum <u>Parish Councils</u> | |

Forest Neighbourhood Council highlighted the need for a review of town centre parking policies to encourage footfall.

Statutory Consultees

Historic England highlighted the potential for the historic environment to support town and village centres.

Object – Policy 13: Town Centre Uses

Number of Comments

14

Summary of Comments

Members of the public and community groups

Individuals commented on the following:

- The need to allow town centre and employment uses in predominantly residential areas to reduce the need to travel
- More should be done to reduce rents and rates in town centres to reduce the number of vacant units
- A1, A2 and B1 uses should be encouraged in established residential areas in order to reduce the need to travel

The Horsham Society proposed the addition of a reference to resisting the loss of community facilities within town and village centres. They objected to the requirement for 12 months of active marketing before loss of town centres uses within primary frontages, suggesting a 24 month period is more appropriate.

Horsham District Cycling Forum highlighted the importance of high streets and town centres being easily accessible via walking and cycling and suggested the policy should require developers to demonstrate that this has been considered. They suggested that reference to the benefits of pedestrianisation of town centres should be added to the policy in recognition of the economic benefit to town centres.

Parish Councils

Forest Neighbourhood Council commented that the policy should promote a mix of activities in town centres to support retail uses and other facilities and services.

Rusper Parish Council commented that economic policies should reflect the need for environmental protections as well as economic development.

Site Promoters

The promoter of Land North and South of Hilland Farm commented that a paragraph should be added which allows main town centre uses outside defined town centres (subject to a sequential test) in sustainable and well connected locations where this will supplement the existing offer.

Policy 14

Housing Target

| Support – Policy 14 Housing Target | |
|---|-----|
| Number of Comments | 147 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>The majority of comments from members of the public who supported a particular option stated their preference for a target of 1,000 homes per year. Reasons for support included:</p> <ul style="list-style-type: none">- The Local Plan should only meet the needs of Horsham rather than other areas.- Neighbouring authorities must do more to meet their quota.- Their support was reluctant but it would have the less negative impact than larger totals.- The district is unable to accommodate a larger quantum of development.- The pandemic and Brexit will mean less pressure for housing. <p>Andrew Griffith, MP for Arundel and South Downs said that 1,000 homes per year was the maximum needed.</p> <p>There were few that preferred a target of 1,200 homes per year. Where this preference expressed, reasons given included:</p> <ul style="list-style-type: none">- This would assist neighbouring authorities- Would prevent developers targeting areas in Horsham not favoured by the community- Government guidelines would be met. <p>Few preferred the option of a target of 1,400 homes. Where such a preference was made, some stated that this would ensure that the Local Plan would be found sound.</p> | |
| <u>Statutory Consultees</u> | |
| <p>Where neighbouring authorities stated a preference for a specific target, 1,400 homes per year was the target identified. Comments provided were as follows:</p> <ul style="list-style-type: none">- Mole Valley District Council: We support the option for the higher 1,400 dwellings per year. We feel that HDC should consider the need to plan for an element of MVDC housing need within the HDC area, either as a component of the 1,400 per year figure or through a higher level.- Adur & Worthing Councils: Welcome and support the implementation of the higher level of housing growth to meet unmet needs from Coastal West Sussex. But suggest HDC make explicit in the Plan, how the upper level of 1,400 homes per annum has been reached and whether higher options have been tested and discounted.- Waverley Borough Council: The proposals to assist the unmet housing needs in Crawley and potentially an element of the Coastal Sussex area, are preferable as there would be no future requirement for you to seek help from Waverley.- Brighton & Hove City Council: Strongly supports HDC's commitment to explore options for the Plan to deliver higher housing numbers which would help meet unmet needs in neighbouring areas. However asks that the housing options being tested need to be more clearly explained and justified against the criteria listed in Paragraph 6.15, including setting out why HDC considers 1,400 homes per year to be an upper limit. | |

- Chichester District Council: Would encourage Horsham District Council to consider seriously the potential to deliver housing to meet wider unmet needs, so far as is appropriate and consistent with sustainable development.
- Arun District Council: Would encourage the testing of the option proposing 1,400 dpa as far as it is sustainable to do so.

Parish Councils

Where Parish Councils suggested a preference for a particular target, 1,000 homes year was most commonly identified. Reasons for this included:

- Meeting the needs of neighbouring authorities should only been met when the strong evidence is provided from all that they have investigated all sites in their areas.
- It meets the minimum number required by national policy.
- Using more recent population figures would lower the total.

Few comments were made regarding a different identified target:

- Horsham Trafalgar Neighbourhood Council were of the view that 1,200 homes per year would strike the right balance contributing to the unmet need of neighbouring districts, but there arguments as to why the figure should be closer to 1,000 and the Council should continue to lobby central government to this effect in partnership with local MPs.
- West Grinstead Parish Council support 1,200 homes per year, but only if this is treated as a correction and a once and for all attempt to address a failure to build sufficient homes over the recent past. The explained that before the next review in 5 years' time, there must be a concerted political effort to concentrate new homes in the north and areas like Scotland.

Developers/Site Promoters

Where a preference for a specific target was expressed, almost every developer thought that it should be 1,400 homes per year. Reasons for this included:

- Helps to meet needs in neighbouring authorities that cannot be met.
- It will enable the Council to meet Duty to Cooperate and soundness tests.
- Will ensure that appropriate amounts of affordable housing can be met.
- There are sufficient sites to meet this target.
- It would accord with national policy.

A number of those commented that the 1,400 homes should be a floor rather than a ceiling and that greater amounts of development should be sought.

Observation – Policy 14 Housing Target

Number of Comments

54

Summary of Comments

Members of the Public and Community Groups

A number of individuals/groups commented on issues relating to the potential housing targets without indicating their preference or opposition to a particular figure. Comments included:

- Housing figures should be reviewed as assumptions relied on prior to the pandemic will not be appropriate.
- Build out rates are not able to be controlled by HDC as they are reliant on developers who often do not build out schemes.
- Targets should be linked to particular types of accommodation that are needed (higher density/older persons).

- Targets can only be delivered if sufficient infrastructure is planned.
- The need relates to people from London to access cheaper accommodation from which they can commute.
- Horsham already help to meet wider needs and neighbouring authorities still don't meet their own requirements.
- Government policy is not appropriate for Horsham and the Council should not meet such policy requirements.
- Government policy is changing and likely to seek to direct development elsewhere.
- Empty homes in London, generate a need for housing in Horsham.
- The housing targets sought would provide more homes than projected population increases would require.
- The Council is stuck between a rock and a hard place but will need to mitigate the consequences of building at high numbers.

Statutory Consultees

Mid Sussex District Council: Broadly agrees the standard methodology of a need in Horsham for 965 dwellings per annum. The three options for housing numbers are premature, and it is not obvious that they are based on evidence of a deep consideration of impacts. Such judgements should be based on sound planning considerations, not the 'voting' preferences of respondents alone. Analysis of realistic delivery trajectories of sites and infrastructure requirements should be provided.

Parish Councils

Where Parish Councils commented on matters related to housing targets, but did not express positions, their views included:

- The Council has not made the question easy to answer as it has not take a position on the mix of sites to be selected.
- The current HDPF, which plans for 800 homes per year has been in place for 5 of its 15 years and is meeting targets. It is not in anyone's interest to change.
- It is not clear if the Government's methodology takes note of HDC previously meeting unmet need in Crawley.
- There is disparity in numbers for each parish/settlement.

Statutory Consultees

Gatwick Airport Ltd did not pass comment on the three different options. Their concern was to ensure that the location and impacts of any strategic allocations are compatible with the future development of the airport.

Object – Policy 14 Housing Target

Number of Comments

276

Summary of Comments

Members of the Public and community groups

The vast number of individuals/groups who commented objected to the options consulted on, with many stating that planned numbers should be less or should not exceed current rates of development. Many implored the Council to push back against Government housing requirements with large numbers suggesting that the Government's methodology is flawed and thus the need for housing is overstated and/or that Horsham District should not consider the unmet needs of neighbouring authorities.

Other comments included:

- Development should be directed to other parts of the country.
- The impact of the pandemic and/or Brexit will reduce the need for development and targets should be reassessed in light of these events.
- Development at the targets proposed would be unsustainable and would cause harm (such as by causing loss of agricultural land, increasing flooding, impact on biodiversity and wildlife, contributing to the causes of climate change, etc.).
- Development would impact on existing infrastructure/would not be adequately provided for with respect to new or improved infrastructure (transport network, education and health services, leisure facilities, etc.).
- There has already been overdevelopment.
- New homes would be targeted at people from outside of the district and/or would be unaffordable to local people.
- The standard methodology/ Duty to Cooperate is not a requirement.
- The amount of homes planned for will not be delivered.
- Decisions on housing should be made only after 2018 housing projections/2021 census/Planning White Paper is released.
- The 5% buffer should not be added to the housing target.
- The London Plan has identified enough land for needs to be met and reference to unmet needs in South London should be removed.

Statutory Consultees

Natural England noted that the Sustainability Appraisal will be used to test for housing numbers and that a critical test must be the availability of water in the region to supply the new homes.

Parish/Neighbourhood Councils

The vast number of Parish Councils (including Inter Parish Group) objected to some or all of the options indicated, with all expressing concern at levels of development. A number referred to political options (i.e. challenging Government or speaking with MPs) and some indicated support for HDC's efforts in this regard. It was common ground that development would have significant impacts on existing local infrastructure.

Other comments included:

- Targets do not take into account the pandemic and/or Brexit which are likely to impact upon future projections
- Developing at high levels contradicts other Government aims such as those relating to the environment, climate change or in relation to levelling up other parts of the country.
- Unmet need of other authorities is not properly evidenced and/or need not be met in Horsham.
- Numbers are not achievable and excessive
- The rural nature of Horsham will be negatively impacted.
- The Government is likely to change policy and therefore the Council should delay.

Developers/Site Promoters

A number of promoters alluded to national policy and guidance, expressing that the standard methodology is the starting point for identifying a housing target.

A number of site promoters suggested that due to unmet needs in neighbouring authorities, that the lower options should not be considered and that as a minimum, the higher figure of 1,400 should be preferred.

A common comment also suggested that the Council should be looking at options higher than 1,400 homes per year with a number feeling that the District had less constraints to development than neighbouring authorities.

Settlements/Parishes

Ashington

| | |
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| Support – Ashington | |
| Number of Comments | 10 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>A few comments were received which wrote in favour of a collection of sites north of Rectory Lane, preferring them to sites to the south of Rectory Lane. Comments included:</p> <ul style="list-style-type: none"> - There is good access onto the A24 and potential for further development on the northern edge of Ashington Village. - Development at this location will keep traffic away from the centre of the village. - The proposed allocation in the neighbourhood plan will constrain any future expansion of the school. - Development should be centred to the north of the village. <p>A comment was made that Ashington has good transport links and could be considered for expansion.</p> | |
| <u>Site Promoter</u> | |
| <p>A number of site promoters wrote in support of their site and it was common for mention to be made that:</p> <ul style="list-style-type: none"> - Ashington is an appropriate location for development. - Smaller sites will ensure the delivery and provide a wide range of housing to meet the district's housing target. - The Local Plan should not be over reliant on large, complex sites and therefore requires smaller sites distributed around the district. <p>It was additionally mentioned that the group of sites South of Rectory Lane had been identified in the emerging Neighbourhood Plan and could be delivered quickly. Concern was expressed that development to the north of Rectory Lane could jeopardise development of the sites and cause resentment by residents.</p> | |

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| Observations – Ashington | |
| Number of Comments | 15 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>In relation to Ashington, a number of comments felt that the IDP did not reflect the up to date position in respect of services and infrastructure while pointing to evidence produced by the community in preparation of the Neighbourhood Plan. Similar points were made in respect of the Council's Open Space and Recreation Study.</p> <p>Some comments (including those from site promoters) pointed out that the combined total for all sites amounted to 625 and not 600 as indicated on Table 1.</p> | |
| <u>Site Promoter</u> | |

A new site was submitted for consideration, at land east of Mousdell Close. The promoters explained that the site is currently located outside the existing BUAB and is relatively unconstrained. In their view, the site is available, achievable and deliverable and will contribute positively towards the district's housing supply.

Statutory Consultees

Highways England make comment on the following with regards to the Strategic Road Network in and around the district. In respect of Ashington, they explained that 600 homes at Ashington will potentially have an impact at the A27/A24 junction.

Southern Water commented that they had looked at potential development sites in Ashington, explaining that:

- have undertaken a preliminary assessment of the capacity of existing infrastructure and the ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. While also explaining that limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure.
- Proposals for 600 dwellings at Ashington will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the new Infrastructure charge to developers.
- Southern Water would like to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.
- Southern Water's underground infrastructure crosses the sites. This needs to be taken into account when designing the site layout. Easements would be required, which may affect the site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.
- Proposed amendment to policy:
 - o Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.
 - o Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purposes.
 - o The capacity of the local sewerage treatment works will need to be considered in the master planning of this site and may require phasing of development.

Object – Ashington

Number of Comments

197

Summary of Comments

Members of the Public and community groups

A large number of responses were received in opposition to either the principle of growth in Ashington and/or to the development of particular sites. Reasons for objection included:

General development in Ashington

- Ashington lacks a good bus service, has no train station and residents would be reliant on cars.

- Additional cars would cause additional congestion, such as on Rectory Lane.
- Growth would contribute to the release of greenhouse gases, causing climate change.
- There is a lack of parking, which would be exacerbated by new development
- The village centre is not large enough to cope with increased amount of development.
- A large increase in homes without a commensurate rise in employment is not sustainable.
- Infrastructure will not be provided to accommodate development and current services are insufficient with access in other settlements.
- Growth will erode gaps between settlements.
- Growth proposed for Ashington is disproportionate compared to some larger more sustainable villages in the district.
- Development should not exceed that identified in the Neighbourhood Plan
- Lack of engagement with residents of Ashington on the proposed additional cluster north of Rectory Lane.
- Consultation event in Ashington was inadequate.
- Proposals outside the BUAB should be discounted.
- Greenfield development should not be supported.
- School expansion is necessary to accommodate more development.
- Development in Ashington would not be sustainable and would not be consistent with the plan's objectives.
- The houses will not sell in this economic climate.
- The standard methodology should be applied to each settlement.
- Development would contribute to poor air quality.
- There is little retail nor ability for retail to expand.

Cluster of Sites North of Rectory Lane

- Insufficient consultation has taken place on this site.
- Development would harm the quiet enjoyment of mobile homes.
- The analysis of the cluster should be reassessed as the sustainability appraisal and site assessment reports include inaccuracies.

Cluster of Sites South of Rectory Lane

- Development would impact on heritage assets.

Parish Council

Ashington Parish Council made the following points in objection to development in Ashington:

- There is no evidence to demonstrate the strategy is deliverable.
- Not based on proportionate evidence especially relating infrastructure and viability and has assessed reasonable alternatives (SEA/SA) and is therefore flawed.
- It is not consistent with the UK legal obligations with regarding the Paris Climate Change Agreement and its legally binding requirement to reach net zero carbon by 2050. The agreement is not considered as part of the international policy document in the interim SA.
- The scale of growth exceeds any other medium village and is inconsistent with the settlement hierarchy. Ashington lack the infrastructure to accommodate such growth levels. Growth levels for Ashington are not sustainable especially with no employment provision in the locality.
- Ashington will continue to be dependent on the car.
- There is no justification or evidence to demonstrate a threshold of 50 dwellings will provide delivery. It appears to be an arbitrary number without justification. Lack of consultation with the community on the scale of development proposed by the Reg 18 and

it is considered the scale of development undermines the validity of emerging neighbourhood plans coming through.

- The parish council strongly objects to the 600 dwellings proposed for Ashington, highlighting inconsistencies in the site assessments and the assumptions being made.
- The level of retail provision is inadequate to support growth levels proposed in the Reg 18 plan. This is not sustainable growth and a lot of residents will be dependent on the car to get their weekly food shop. Further comment is made on growth levels and the impact on local education, health provision, leisure and sports provision/open space. These issues are not address in any strategy for Ashington.
- The plan is not justified, not effective and nor is it consistent with national policy and fails the test of soundness.
- There are a number of errors in the site assessments (Appendix A)

Washington Parish Council identified an objection to the quantum of development proposed for Ashington. It is considered the quantum of development proposed for Ashington is contrary to the plan's stated sustainability objectives, there was no certainty regarding infrastructure and the village would lose its identity.

Site Promoter

A number of promoters objected to the assessments of their sites, questioning the negative ratings against particular criteria and inconsistencies with other sites, some of which were assessed more favourably. A number of comments mentioned the sustainability of Ashington.

Barns Green

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|--|----------|
| Support - Barns Green | |
| Number of Comments | 3 |
| Summary of Comments | |
| <u>Site Promoter</u> | |
| The site promoter for SA613, supported the allocation of the site, noting that: | |
| <ul style="list-style-type: none"> - Identified in the emerging NP as a mixed use site with employment and housing (32 dwellings with 7 light industrial units) - Further additional figure identified in the regulation 18 LPR of 50 dwellings should be in addition to the 61 identified in the emerging NP. - Support is given to settlement hierarchy and Barns Greens position within it as a medium village - Amend the BUAB to accommodate the inclusion of SA613 | |

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| Object – Barns Green | |
| Number of Comments | 7 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| Comments from members of the public and community groups included: | |
| <ul style="list-style-type: none"> - Small scale developments should be pursued. - All proposed Itchingfield SHELAA sites should be reassessed (currently neutral). The parish is covered by Bat Sustenance Zone and there are other ecological/biodiversity | |

considerations which should feature prominently as part of the site allocation process. It is considered such issues were not given full consideration.

- Development of Sumners Ponds will detract from the tranquillity of the village with increased noise, light and air pollution generated from construction traffic. The historic fabric of the village would also be impacted arising from over development. The quantum of development proposed would require investment in infrastructure which would change the character of the village negatively.
- Objection to SA006/SA510 and SA344 – all sites have been considered by the emerging Neighbourhood Plan and found not to be viable and therefore should not be considered. Development on these sites will destroy the rural nature of the village and lead to increase commuting and traffic. It should be left to the neighbourhood planners to find suitable sites and not the ones shortlisted.
- Support is given to preserving green spaces but this strategy is contrary to any infill policy the plan is proposing with increased pollution and congestions arising from smaller sites development. This strategy should be removed and reconsidered. Development should centre on 3 to 4 large sites.

Billingshurst

| Billingshurst – Support | |
|--|---|
| Number of Comments | 5 |
| Summary of Comments <u>Members of the Public and community groups</u> <ul style="list-style-type: none"> - Hilland should be considered for further housing or small industrial units creating further employment in the area. - Henfield and Billingshurst are effectively more suited to growth. Sites such as Rookwood should not be lost and is a valued amenity for the local community. <u>Site Promoter</u> <ul style="list-style-type: none"> - The promoter of development centred on Hilland House and Wooddale Cottage felt that it would be appropriate for an Eco Village comprising of sustainable modular homes and for the elderly population. | |

| Billingshurst - Observation | |
|---|---|
| Number of Comments | 7 |
| Summary of Comments <u>Members of the Public and community groups</u> <ul style="list-style-type: none"> - Billingshurst cannot be expected to take on the unmet needs of adjacent authorities. - Billingshurst house prices are expensive and out of reach for the majority and are not affordable. - All land identified by HDC should be identified in good time and should be scrutinised properly. - Assessment of employment sites within the village with the possible relocation on the edge of the village to avoid HGV traffic travelling through the village centre particular as heavy HGV traffic travel pass local schools. | |

- Proposed development especially the three large development sites should be assessed on their cumulative impact on the village.

Site Promoter

- Land in between McVeigh Parker Yard and Wadeys Builders Yard should be considered for inclusion for small scale starter units (employment)
- Land at Okehurst Lane, Billingshurst is promoted for employment use (north of Billingshurst on the A29 and south of Okehurst Lane) to support the rural economy. Amendments proposed to SP7 Employment and SP8 Rural Economic Development.

Statutory Consultees

Natural England raise in respect of the strategic sites in and around Billingshurst, the need to consider the impacts from surface and waste water on the Upper Arun SSSI together with the scope for mitigation. They also flag up that these sites have the potential to impact functionally linked land associated with The Mens SAC and request regard be given to its protocol for the Sussex Bat SACs and the importance of functionally linked habitats. Some sites may also be considered to lie within the setting of the South Downs National Park and should therefore respect the value of the setting which should be protected by managing the nature, scale and location of development.

Billingshurst – Objection

Number of Comments

43

Summary of Comments

Members of the Public and community groups

Objections to development in Billingshurst were put forward both on the principle of general development or on specific sites. For ease, these are separated out, below. Comments about larger sites in and around Billingshurst are covered in their own summaries.

Principle of development

- Billingshurst cannot be expected to take on the unmet needs of adjacent authorities.
- Congestion in the high street from HGV cause congestion and air pollution with new strategic sites likely to contribute to further pollution and congestion.
- Infrastructure is under pressure at the moment and will continue to be under stress if proposed development comes forward.
- The village will be become further urbanised and loses its rural character.
- The village has expanded 30% since 2011 and should not expand any further without investment in infrastructure.
- Loss of valuable amenity space and congestion on local roads.
- Valued local countryside walks will be lost to development
- New development will create significant congestion, air pollution, increase potential flood risk and put stress on local services such as schools and GPs.
- No further development in Billingshurst as recent scale of development in the village confirms the village has contributed enough to the district's housing supply. Adjacent authorities should take some of Horsham's housing requirement.
- Support is not given to turning residential roads into 'access' road for new development causing localised congestion.
- There is a limited local bus service connecting the village to the wider locality.

- Local Waiting lists for schools and doctors are long and will be more pressure on these services arising from new development.
- Too much development when the market is slowing down and existing properties are not being sold.
- There are no key services such as a banks.
- The quantum of development proposed is not sustainable and detrimental to local wildlife and the wider environment.
- There is a lack of a comprehensive infrastructure plan.
- The quantum of development proposed by the Regulation 18 exceeds the Housing Needs Assessment undertaken by the neighbourhood planners
- The village has experienced significant growth in recent years and should be given time to assimilate new development rather than take on more development.
- Proposals are not explicit on issues of climate change and net biodiversity gain.

SA043

- Substantial development (but not substantial enough to be properly self-sustaining) in such a remote location would be road-dependent and unsustainable and represents a failure to take account of climate change legislation.
- There would be significant adverse changes to the historic settlement pattern of the District, notably more so than the other options proposed.
- The site is located some distance from the local employment centres of Horsham and Crawley with no public transport connections.
- It is unrealistic to expect the provision of employment space as part of the development to meaningfully reduce transport effects. It is more likely to exacerbate the issue by introducing in-commuting as well as out-commuting.
- There are no existing public services within the vicinity of the proposed site. Existing education and healthcare services have no or limited capacity to support new development.
- A meagre provision of public transport is suggested. The majority of residents and employees would utilise private vehicles on the A29 and A272 which have limited scope for increased capacity. Substantial increases in private vehicular movements introduces a concern regarding road traffic safety and also air quality.
- Additional commuters would pile yet more pressure on already stretched commuter rail services.
- The proposal would bring significant adverse changes to the landscape, in particular, the loss of rural landscape.
- The site is home to a variety of wildlife, including protected species such as bats, barn owls and nightingales.
- The site has the potential to hold great archaeological importance, being located alongside the A29, a former Roman road.
- The developers are over promising the number of homes and jobs and services that can be delivered on the site. Particularly once the site constraints have been taken into account. The scheme would deliver either a very dense development, under provision of key social infrastructure or under provision of employment space.
- The site has a constriction over the railway, this is also a footpath and public right of way. This creates a safety issue as the majority of the site is trapped and landlocked by this.
- If the suggested join into Kingsley Chase were achieved this again would sacrifice a footpath and create a cut through a residential areas to avoid the A29 which will become congested.
- You would need a major junction on a busy arterial road to allow the traffic to exit and enter this site. Unsafe and unnecessary.

SA049

- This is a large scale development totally detached from Billingshurst. Every house requires a car, and all this traffic has to enter and exit the A272 causing significant delay and danger to cyclist and other road users.
- At best this could be a smaller (150 plot) development.

SA560

- This destroys rural land unnecessarily for minimal gain. This is opposing the rural appeal that Billingshurst has and is a reason for visiting the village.
- There would need to be a buffer between the housing and the woodland.
- Marringdean Road has limited capacity, a site here adds a junction feeding onto a B road. There is danger to cyclists, pedestrians and traffic.

SA607

- This is a development too far from the village. All houses require vehicles which increases congestion and pollution.
- The site has already built over a public footpath making safe pedestrian passage along Marringdean Road impossible.
- The footpath would need to be restored where it is on the map, or better still continue the cycle lane and footpath in Kingsley Chase – thereby connecting Marringdean Road with the village. This could be achieved inside the hedge line as Kingsley Chase has done.
- If approved the developer should be tasked to repair and improve pavement south of the development as far as the pavement runs. This connects the isolated houses on the periphery of the village.

SA678

- This destroys rural land unnecessarily for minimal gain. This is opposing the rural appeal that Billingshurst has and is a reason for visiting the village.
- There would need to be a buffer between the housing and the woodland.
- Footpaths would need to be retained and protected.
- Marringdean Road has limited capacity, a site here adds a junction feeding onto a B road, on a bend. There is danger to cyclists, pedestrians and traffic.

Other sites

- SA409 and SA642 do meet sustainability tests and should be discounted from the process.
- SA656 is described as a tree lined drive. However, will this be retained moving forward? Clarification is sought on the nature of the access and the boundaries. The northwest part of the site is identified as suitable for development and only this part should come forward (Western side of the site). The information presented is unclear.
- Objection to SA074. Remove smaller sites from the strategy saving small open spaces from being developed (infill).

Parish Council

Billingshurst Parish Council strongly objected to the strategic level of development targeted at Billingshurst, believing it to be disproportionate and inappropriate in relation to. They point that development would double the size of the village from the 2011 Census (or treble it is the new settlement proceeds), the following concerns were raised;

- recent growth of the settlement
- proposed strategic growth significantly exceeds the identified local housing need and / or employment need

- current local-scale housing capacity already meeting local-scale growth (eg commitments and windfall)
- the scale and function of the settlement type
- infrastructure capacity, including the village centre
- development is not contained within an existing defensible boundary

They were of the view that major strategic growth at Billingshurst is not an appropriate strategy for the area, taking into account the reasonable alternatives, and based on proportionate evidence and is therefore not justified. The Parish Council would like to work with HDC to jointly evolve an alternative strategy of a number of smaller scale allocations selected from the SHELAA, 2018.

Pulborough Parish Council objects to expansion of Billingshurst as it will have a significant impact on Pulborough as traffic southbound will place increased pressure on local services and infrastructure in Pulborough.

Developers/Site Promoters

Site promoters for a number of sites around Billingshurst submitting comments. In general, those who commented felt that their sites should be found suitable for development and should be allocated in the Local Plan. A number of representations explained why, in their view, their sites were preferable to others and it was common for points to be made suggesting that a range of large and small sites would be a better approach to take than being reliant on strategic sites. A number also suggested that conclusions received on a number of sites were incorrect or not justified.

Promoters involved with sites (SA409 and SA642) adjacent to the potential West of Billingshurst strategic site argued that their sites could be allocated in isolation or in conjunction with the area being promoted for a strategic allocation.

General comments relating to development at Billingshurst included:

- Billingshurst is recognised as a sustainable settlement in the district's hierarchy and should accommodate additional growth.
- Billingshurst is well served by services.
- Development in Billingshurst will contribute to achieving district wide needs.
- Development should be dispersed around the district rather than being concentrated in particular locations.
- Billingshurst is well located with respect to the Gatwick Diamond and has a railway station.

Broadbridge Heath

| Support – Broadbridge Heath | |
|--|---|
| Number of Comments | 2 |
| Summary of Comments | |
| <u>Site Promoters</u> <p>The site promoter of Land at Wellcross Farm (SA622) supports the allocation of smaller sites within the Local Plan and states that Land at Wellcross Farm is available and deliverable. They state that there should not be an over-reliance on larger sites, which, as established by the Letwin Review, can take significant lengths of time to be approved and built-out and highlight paragraph 68 of the NPPF, that small and medium sized sites can make an important contribution to meeting housing requirements and Inspired Villages is therefore supportive of the allocation of smaller sites within</p> | |

the emerging HDLP. They explain that the site can deliver 141 units of specialist accommodation for older people and that an outline planning application is currently well advanced and could be delivered in the early part of the proposed Plan period. Consequently they believe that the site achieves the aims of a deliverable smaller site and should be allocated.

A submission was made by those promoting Land at Lower Broadbridge Farm. This is formed of three SHELAA sites SA386, SA766 and SA102. The Council's Site Assessment report identified SA386 has having some potential for residential development and the eastern section of SA102 is identified as having potential for employment development. SA766 has not been identified as having potential for development, given the significant constraints associated with the minerals site, the existing Grade II listed building and the surrounding landscape.

They made the following comments:

- The land at Lower Broadbridge Farm can deliver residential and employment development in a single sustainable location on the edge of a Tier 2 settlement and in close proximity to existing residential and employment uses
- Gleeson is supportive of the Council's approach to housing delivery which recognises the importance of small and medium sized sites
- Gleeson Strategic Land fully supports the identification of the land at Lower Broadbridge Farm for a mix of employment uses, particularly as it is well related to the existing BUAB and is accessible by a range of non-car modes
- Notwithstanding this support, Strategic Policy 6 does not allocate the full potential which can accommodate 4.6ha, an increase of 0.9ha on the drafted policy
- An indicative masterplan demonstrates how the site could deliver 4.6ha for B1, B2 and B8 employment uses, c.211 dwellings (on land totalling 5.7ha) and 9.4ha of formal and informal open space
- The land (SA386, SA766 and SA102) is being promoted as a single development which accords with Section 11 of the NPPF, making effective use of the land
- The site should be allocated and assessed as a single site to enable the wider benefits of the proposal to be acknowledged
- Elements of the site assessment should be updated to reflect further information submitted to the Council, including:
 - Site access can be provided by a 4th arm to the existing roundabout with minimal loss of hedgerow
 - Landscape sensitive areas and flooding considerations are contained within the western boundary of the wider site, but these are outside of the red line boundary for the area identified within SA102 as having potential and should therefore be removed
 - The assessment for employment uses in the Interim Sustainability Appraisal suggests that the site is not located to infrastructure that would promote health and wellbeing, however, this fails to consider non-medical aspects of health and wellbeing
- In continued support of the site, Gleeson Strategic Land has submitted updated documents to support the ongoing site assessment and discussions with the Council
- Gleeson Strategic Land consider that the Council's approach in assessing the sites separately has caused difficulties and inaccuracies, including the assessment of SA766 which has been assessed as unsuitable for development on the basis that the site needs to be protected for minerals extraction, which is incorrect.
- The Council's acknowledgement of the sustainable location of the site(s) is welcomed as is the potential to accommodate development within sites SA102 and SA386.

- Gleeson Strategic Land accept that some of the western boundary is more sensitive to development and have accordingly proposed a large swathe of open recreational land
- As illustrated by the Development Opportunities Document and the development of the concept masterplan, consideration has been given to the setting of the listed building, flood risk on the western boundaries of the site, the geese habitat surrounding the farmhouse and the High Pressure Gas pipeline
- The Site Assessment concludes that the sites SA102 and SA386 have “Unfavourable Impacts (with Potential for Mitigation)”, but this fails to acknowledge the representations made through the Call for Sites and the conclusion should therefore be “Neutral Impact”

Observation – Broadbridge Heath

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|---------------------------|----------|
| Number of Comments | 1 |
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Summary of Comments

Statutory Consultees

Surrey County Council identified that some smaller sites (including those at Broadbridge Heath) are close to main roads that feed into Surrey and have concerns about transport impacts on Surrey from development in Horsham.

Natural England made specific comments in relation to SA386 (Land at Lower Broadbridge Farm) and SA622 (Land at Wellcross Farm) highlighting that potential impacts from surface water and waste water on the Upper Arun SSSI should be considered for these sites, together with the scope for mitigation.

Object – Broadbridge Heath

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| Number of Comments | 8 |
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Summary of Comments

Members of the Public and community groups

A number of individuals objected to the potential allocations at Broadbridge Heath, citing the following reasons:

- Small scale should mean small scale at 5% of the existing houses – Amongst others, Broadbridge Heath exceeds this
- Consistent expansion of existing settlements, including Broadbridge Heath, puts local services and infrastructure under severe strain and subjects residents to increased noise, activity, cars and people
- Smaller sites do not deliver the leisure and open space facilities that larger sites deliver
- Larger sites are preferable to smaller sites because of the impact on existing residents

Parish Council

Broadbridge Heath Parish Council acknowledged the pressure from Government to provide adequate housing provision, however Broadbridge Heath Parish has taken a huge amount of development in recent years and it strongly requested that there are no more large or significant schemes within of adjacent to the parish boundary. Members are seriously concerned about the flood risk associated with the proposals on SA386 (Lower Broadbridge Farm) and SA622 (Land at Wellcross Farm) and object to these sites. In considering the commercial development of Lower Broadbridge Farm, Members objected to this site on the basis of the loss of green belt surrounding the already extensively developed village.

Slinfold Parish Council considers that SA386 (Land at Lower Broadbridge Farm) should not be included, stating that development of this site will quickly lead to applications for development up the A281 towards Clemsfold and westwards towards Slinfold, which would be contrary to Slinfold's made Neighbourhood Plan. It was also stated that the line for Slinfold is inaccurate as written regarding site SA386 is in the Parish.

Site Promoters

The site promoter of Land at Lyons Road (SA492) highlighted that there is a live planning application on the site for a Continuing Care Retirement Community (planning application reference DC/19/1723) and objected to the consultation and the Plan. They made the following comments in relation to the approach taken to small site allocations at Broadbridge Heath:

- This site was considered alongside SA386 in the HDPF 2015 Local Plan examination for C3 housing
- Since this time the site has been considered for specialist housing for the elderly but this has not been mention in the Site Assessment report, only that it has an active planning application under consideration
- There are flaws in the Site Assessment Report (Feb 2020), the SHELAA (2018) and the housing section in 2019, the SHMA is inadequate and the Plan fails to give the necessary importance to the needs of older people in the District
- The proposed Plan does not do what the NPPF and the PPG advises, particularly in respect of the PPG for *"Housing for older and disabled people."*
- Objects to the treatment of SA492, particularly compared to site SA622 and considers that SA492 should be allocated, citing the following reasons:
 - The Plan should be changed to make CCRC specialist housing self-contained sites strategic sites for the purposes of allocations
 - The Site Assessment Report 2020 has not taken account of the specific way the site has been described in the planning application, nor the extensive mitigation
 - A number of reasons have been put forward to explain why this site should be allocated, referencing the type of development being proposed, how helping older people to move can free up homes, the identified housing need and lack of supply in the area and employment creation opportunities, the facilities and improvements the site can make, among a number of other reasons.
- With the exception of a remaining query on ecology, the site promoter states that all technical matters have now been answered on the application
- The site promoter raised a number of concerns with regards to how the two sites were assessed, in particular a lack of consistency on the following grounds: the type of accommodation, landscape, proximity to services and how the sites relate to the River Arun

Christ's Hospital

| Christ's Hospital - Observation | |
|---|---|
| Number of Comments | 1 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| A comment was made that suggested Christ's Hospital should be protected from development particularly overspill from Horsham and Crawley. | |

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|---|-----------|
| Christ's Hospital | |
| Number of Comments | 11 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| Comments made included: | |
| <ul style="list-style-type: none"> - Traffic level between Broadbridge Heath and Two Mile Ash Road is at capacity with limited infrastructure to support development. - Public transport needs to be improved. - Take smaller sites out of the draft plan saving 'infills' for green spaces for the wellbeing of communities. Development and growth should centre on 3 or 4 large sites. - There are no services and should not be a smaller village - Development of SA129 would be contrary to existing policy and site is at risk of flooding and is limited by ancient woodland and TPOs. Though reduced in capacity, it would be raised in the future. | |
| <u>Parish Council</u> | |
| Southwater Parish Council objected to the proposed number of houses based on the standard methodology. It was felt that this figure was difficult to achieve without adequate infrastructure and this would be exacerbated by the pandemic. | |

Cowfold

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| Support - Cowfold | |
| Number of Comments | 2 |
| Summary of Comments | |
| <u>Site Promoter</u> | |
| The promoter of sites SA609 and SA610 support the sites being shortlisted and recommend their allocation in the Local Plan, particularly if SA610 does not come forward in the Neighbourhood Plan. | |
| The promoter of SA366 Land East of Cowfold support its inclusion as a potential site allocation and recommend that the site is allocated in the Local Plan. | |

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| Observation – Cowfold | |
| Number of Comments | 4 |
| Summary of Comments | |
| Observations on smaller site allocations in Cowfold suggested it would be appropriate to consider further expansion around the settlement given its location close to the A272 and A24. | |
| <u>Site Promoter</u> | |
| The site promoter highlighted a typographical error in the smaller site allocation (SA038 should read SA083). | |

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| Object – Cowfold | |
| Number of Comments | 17 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>A number of individuals made representations. Common reasons for objecting included to the potential allocations:</p> <ul style="list-style-type: none"> - Traffic congestion and air quality issues, in particular the Cowfold Air Quality Management Area (AQMA) - Reassessment of Cowfold's position in settlement hierarchy due to AQMA - Difficulty in accessing Horsham Town via sustainable transport modes leading to more travel by private car - Destruction of habitats - Lack of capacity in local amenities and facilities - Concerns over flooding on some sites - The need to focus on larger sites and remove smaller site allocations from the plan in order to protect green, open space in existing settlements | |
| <u>Site Promoters</u> | |
| <p>The promoter of three sites (SA052, SA791 and SA747) has objected to the exclusion of the sites from the smaller sites allocation in Policy 14, for the following reasons:</p> <ul style="list-style-type: none"> - The sites fall within a defensible boundary to the east of the settlement of Cowfold - Develop in this location would have good access to existing village amenities - Inconsistent application of site assessment criteria for the three sites and SA366 <p>They have also objected to the inclusion of SA366 on the basis that the community were clear that this site should not be take forward in the Neighbourhood Plan.</p> <p>The promoter of a new site has objected to the smaller site allocation in the plan:</p> <ul style="list-style-type: none"> - A new site encompassing land to the north, north west and north east of the village is being promoted and should be allocated in the Local Plan (an extended version of site SA778) - Allocation of this site would justify the reclassification of Cowfold within the settlement hierarchy to a 'Main village' - The site could contribute to the district meeting its own housing need as well as the unmet need of neighbouring authorities | |

Henfield

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| Henfield - Support | |
| Number of Comments | 27 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>Comments made in support of development in Henfield included:</p> <ul style="list-style-type: none"> - Henfield is a small town/large village as identified in the settlement hierarchy and is a secondary retail centre. | |

- Smaller sites in large villages such as Henfield are preferable to strategic development sites.
- Development should be spread around the district.
- Agree with allocating sites in the Neighbourhood Plan.
- Brownfield sites within Henfield are preferable to sites in other locations.
- Development in Henfield is preferable to Mayfield.

Site Promoters

A number of site promoters supported their site being identified in Table 1 of the Local Plan. A number of those identified the sustainability of Henfield. Mention was made that development could exceed that identified in the Neighbourhood Plan. Though a number of such site promoters were generally positive, there were comments that suggested their sites could accommodate greater development and/or that particular factors should be reconsidered and corrections made.

| Henfield - Observation | |
|---|---|
| Number of Comments | 6 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <ul style="list-style-type: none"> - Amend Table 1 to reflect the differential between Henfield Neighbourhood plan (the allocations proposed in the plan 270) the sites which are included in the Reg 18 in Henfield (155) and Small Dole (51). - Support is given to Henfield Neighbourhood Plan | |

| Henfield - Object | |
|---|----|
| Number of Comments | 43 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>Comments received on the principle of development in Henfield included:</p> <ul style="list-style-type: none"> - Henfield has received too much development over the last 10 years. Further development of the scale proposed will impact on the character of the village. - Henfield has lost/is losing services such as banks and retail. - Additional housing will put stress on local infrastructure. - In allocating sites, no consideration has been given to retail or employment needs of the village. - Further development of greenfield would create urban sprawl into the open countryside and such open spaces should be protected. - Development would increase flood risk. - The local road network is susceptible to flooding. - Henfield is a village not a town and development would impact on this character. - Increased development would impact on local wildlife and increase air pollution on local roads. - Sites are already proposed in the neighbourhood plan. No further sites are required on edge of Henfield. - Local road capacity cannot accommodate further growth. | |

- Nearest significant employment areas to Henfield are Mackley Estate and Henfield Business Park both are reliant on car travel with increased air pollution. Horsham is more accessible by public transport.
- The Parish Council and local community should be allowed time to bring forward extra sites if housing target is increased.

Objections to specific sites included:

Land north of Furners Lane (SA005)

- Furner's Lane has limited vehicular capacity
- Development would be detrimental to local biodiversity and the wider landscape
- Development would result in loss of agricultural land
- The site lies within a protected soft sand mineral extraction zone as well as increase potential flood risk.
- Charlwood Drive would be the main access to the site and could potentially cause conflict with pedestrians, cause more congestion and concerns over road safety.
- SA005 is contrary to SP15 without safe vehicular access especially for emergency services.
- Brownfield development should come forward first.
- Site has already been considered and rejected by the Neighbourhood Plan.
- Impact on listed building.

Land west of Backsettown Farm (SA011)

- Development would cause increased traffic, particularly on Furners Mead.

Land at Sandgate Nurseries (SA317)

- The Site was previously refused.
- There is a lack of water and sewage capacity in this part of Henfield.
- It is contrary to SP2 as it is outside the BUAB.
- Rejected by the Neighbourhood Plan
- Would negatively impact on landscape.
- Impact on listed building.
- Brownfield land should be developed first.

Land at Parsonage Farm

- Impact on the wider countryside, including National Park.
- Increased flood risk.
- Loss of valuable agricultural land.
- Discounted from Neighbourhood Plan process.

Parish Council

Henfield Parish Council explained that they do not acknowledge the housing market area for Henfield is shared with the Sussex coastal authorities. They also were of the view that the methodology behind the numbers allocated to each parish/settlement is unclear, noting that both Henfield and Steyning are in the same settlement hierarchy tier but Henfield is allocated more housing than Steyning.

The Parish Council noted that a number of the sites had been allocated in the Neighbourhood Plan and made comments on sites that were not included within the Neighbourhood Plan.

Site Promoter

A number of site promoters made comments that their sites should be allocated and/or that their sites were preferential to other sites. They generally made specific comments on the suitability of their sites. General comments included:

- Small scale developments are preferential to large scale sites as they are quicker to deliver and less complex.
- Small sites will be required to meet housing needs.
- Identification of additional sites exceeding that set out in the Neighbourhood Plan would negate the Parish Council from having to review their Plan.

Horsham Town (Forest Ward)

| Horsham Town (Forest Ward) - Support | |
|--|---|
| Number of Comments | 1 |
| Summary of Comments <u>Site Promoter</u> The site promoter for SA074 (Hornbrook) supported the identification of their site on the following grounds: <ul style="list-style-type: none"> - The site relates well to the built form of Horsham - A transitional zone between the site and the edge of the AONB is being promoted. - A Landscape Visual Impact Assessment has been completed to indicate minimal impact on the AONB - They would Provide pedestrian links including provision of footbridges to Dickins Way and SUDs to tackle flood risk - Relocation of active beehives – Stage one ecology assessment has been undertaken. - Consideration of adjacent heritage assets Grade II listed Hillier Cottage and Falcon Lodge. - Efficiency energy standards will meet and exceed HDC standards. - Affordable Housing requirement will be met. - Have a good record of past delivery. | |

| Horsham Town (Forest Ward) - Observation | |
|---|---|
| Number of Comments | 6 |
| Summary of Comments <u>Members of the Public and community groups</u> A couple of comments were submitted which indicated support for the Horsham Blueprint, though one pointed that Horsham does not yet have a Neighbourhood Plan. <u>Statutory Consultees</u> Southern Water comment that underground infrastructure of bisects the site at Hornbrook Farm and easements would be required. Occupation of development will be phased to align with the delivery of sewerage infrastructure in liaison with the service providers. Layout is arranged to ensure future access to existing infrastructure for maintenance and upsizing purposes. The High Weald AONB Unit mentioned that the setting and views of the AONB must be handled with great sensitivity. | |

| Horsham Town (Forest Ward)– Objection | |
|---------------------------------------|----|
| Number of Comments | 73 |

Summary of Comments

Members of the Public and community groups

A number of objections were received in relation to development on small sites in Horsham (Forest Ward). Comments on Rookwood Golf Club are considered elsewhere.

Objections to SA074 included:

- Impact on the rural setting of Horsham as the site is a natural eastern boundary/buffer for Horsham as it transitions from urban to rural.
- There are better development opportunities elsewhere.
- Shops are limited on this side of the town.
- Local road capacity is under stress and further development will add to this and in particular Doomsday Lane and Hammerpond Lane which are rural, narrow roads will be affected.
- Lack of infrastructure and further development would bring vital services under further stress such as roads, GPS and local schools.
- There is no evidence to support the allocation of this site since it was previously rejected.
- Loss of agriculture land.
- The site is a valuable wildlife corridor (links to St Leonards Forest).
- Impact on the setting of the AONB.
- Flood risk through increase run off.
- The scale of development would require a second access which can be questioned if it can be delivered.
- Impact on ecology and SSSI
- Add to traffic on the Brighton Road bring bringing about pollution (air and noise) and significant congestion.
- Large strategic sites are preferable to smaller sites
- Development on this site is considered to be urban sprawl.
- Increased traffic will be a road safety for local school children.
- The farm buildings should retained as they have heritage value.
- Development will create light, noise and air pollution severely affecting the character of the area.
- The site is a popular local amenity and should be preserved as open space and wildlife is important to local communities.

Parish/Neighbourhood Council

Forest Neighbourhood Council made comments about various parts of the plan and these are covered in relevant consultation summaries. A number of general comments were made about the situation in the town, with mention of poor public transport and hospital provision and the need for infrastructure to be in place to accommodate development.

Forest Neighbourhood Council objected specifically to Land at Hornbrook Farm on the following grounds.

- This site is in the countryside outside the Built Up Area Boundary of Horsham town and does not relate well to the built form of Horsham.
- On a previous occasion, the planning inspector refused a planning application appeal. To date there has been no change in the circumstances of the site.
- A small portion of the proposed site is at risk from flooding. As a result of climate change this risk has increased substantially.

- The site is tranquil in nature and adjoins the AONB.
- The site is a green lung and any development would have an adverse and detriment effect on the wildlife corridors causing light and noise pollution.
- The site does not relate well to the built form of Horsham. The eastern portion of the site is elevated and open nature would require significant landscape mitigation.
- In December 2018 this site was considerable currently undevelopable which is only just over a year ago.

Site Promoter

A number of site promoters made representations on sites they were representing. It was common for such promoters to disagree with the Council's findings in the site assessments, believing that they should have achieved more positive scores. A number of comments highlighted that Horsham Town was the most sustainable settlement in the district and that more sites should be allocated in the Town.

Lower Beeding

| Support – Lower Beeding | |
|---|---|
| Number of Comments | 2 |
| Summary of Comments <u>Site Promoter</u> The site promoter for Sandygate Lane (SA575) supported the Council's conclusion that there was development potential on the site and noted that the site is proposed to be allocated in the emerging Neighbourhood Plan. The owners of Land at Glayde Farm (SA567) confirmed that the site is available and developable. | |

| Observation – Lower Beeding | |
|--|---|
| Number of Comments | 1 |
| Summary of Comments <u>Other organisations</u> The High Weald AONB Partnership expressed that development of identified sites in Lower Beeding could impact the setting of the AONB and will need to be taken into account. They recommend that should such sites be allocated, proposals should have to show how they will impact on the AONB, having regard to the Management Plan. | |

| Object – Lower Beeding | |
|--|---|
| Number of Comments | 6 |
| Summary of Comments <u>Members of the public and community groups</u> A comment received suggestion that there was confusion between the Neighbourhood Plan and Local Plan. | |

A comment was made that the need for Lower Beeding is higher than indicated in the plan and such needs should be met. The standard methodology should be used for assessing need for settlements/Neighbourhood Plans.

Site promoter

The site promoter for Land North of Brighton Road, Monk's Gate (Lower Beeding Parish) SA700 made a number of points about their site, including:

- The site is capable of being made available for a mix of types, including options with a care home and does not necessarily need to deliver conventional residential development. A care home would provide employment opportunities.
- Care home accommodation would help meet identified needs in the community.
- Mitigation and improvements could be included within the site to improve landscape/biodiversity/carbon impact and this has not been factored into the assessment
- Sites have not been assessed in a consistent way and have not considered information submitted to the Council.
- The Council has not discussed the site with the promoter.
- The very negative rating is incorrect.
- It is not clear how a small amount of housing would have significant landscape impacts
- The site benefits from access to transport services and sustainable transport modes and this should be reflected in the assessment.
- The site is covered by the Lower Beeding Neighbourhood Plan not the Nuthurst Neighbourhood Plan
- Sustainability of settlements is not solely related to the relationship with the built up area boundary.

Mannings Heath

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| Object – Mannings Heath | |
| Number of Comments | 7 |
| Summary of Comments | |
| <p><u>Members of the public</u></p> <p>A member of public questioned why there appeared to be no need for housing in Mannings Heath.</p> | |
| <p><u>Site promoters</u></p> <p>The site promoter for Land North of Mannings Heath (SA788) stated that the site had not been properly assessed. In their view, though the site is in the AONB, detailed information previously provided by them, as well as the landscape capacity study findings, had not been taken into account and the Council had not justified its decision to exclude the site. They also explain that the benefits of the site had not been taken into account and weighed up – provision of 100 homes, adjoins the settlement boundary and close to facilities and transport services.</p> <p>The site promoter for Land at Saddlers Farm (SA093) noted that there was not a housing target provided, which differed from other villages in the same tier of the settlement hierarchy. They also stated:</p> <ul style="list-style-type: none"> - The site would score well against the Council's Site Assessment criteria - The Neighbourhood Plan is out of date and more development is needed to address the needs of the local community | |

The site promoter for Swallowfield Paddock (SA420) provided a detailed history in relation to the promotion of the site. In reference to the current Site Assessment, it was expressed:

- The assessment is not justified and is lacking in supporting evidence
- That they disagreed that the TPO on the site would significantly impact development – noting that some of the trees had already died/no longer standing and that only 3 oak trees, bushes and newer trees exist – so it is incorrectly referred to as a small woodland. Work undertaken as part of the HDPF clarified that, with the aid of arboricultural evidence and the Council's Tree Officer means that greater evidence exists than provided for on a desktop basis.
- The site can provide at least 6 homes.
- Boundary screening/landscape impact can be mitigated by additional planting. Landscape issues did not prevent planning permission being granted on Swallowfield Nursery nor its allocation in the Neighbourhood Plan.
- The assessment incorrectly refers to 'Swallow Farm'
- The access isn't a private road and with modifications can be used.
- With regards to A281 access, it is noted that the TPO designation did not prevent hedgerow removal for improved access to Swallowfield Nursery.
- The land to the north is now within the BUAB and subject to a live application.
- The site to the south east has been given planning permission for four houses.
- Previous SHLAA/SHELAA's assessed the site positively. The most recent site assessment has not taken into account of information previously submitted to the Council.

North Horsham

| Support – North Horsham | |
|--|---|
| Number of Comments | 4 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Support was highlighted for the exclusion of sites affecting protected areas (AONB/SSSI), objecting in particular to the development of Land at New House Farm, given its location within the High Weald AONB, impact on existing infrastructure, overcrowding and increased traffic congestion.</p> <p><u>Site Promoter</u></p> <p>The site promoter of Land at Mercer Road (SA568), expressed support for the approach taken by the Council which recognises that smaller sites are important to the housing delivery strategy. They outlined support for the proposed allocation of this site, highlighting the additional benefits that it considers the site can deliver, including car parking at Warnham Station and the delivery of small business units which will complement the draft allocation for further employment space north of the site. They highlighted that this site can be progressed as a standalone allocation that does not need to rely on the neighbouring North Horsham strategic site.</p> <p>They did object to all of the area north of Mercer Road being proposed for employment and consider that the area proposed for employment should be smaller and on the western part only closest to Warnham Station and the existing commercial buildings. They were of the view that the eastern part should be residential only.</p> | |

| Observation – North Horsham | |
|-----------------------------|----|
| Number of Comments | 10 |

Summary of Comments

Members of the Public and community groups

A number of individuals made the following comments regarding sites in the parish of North Horsham:

- The site previously used by Novartis should be used for business/employment rather than residential
- A new site measuring approximately 1,030 sqm (0.25 acres) sited to the east of Langhurst Wood Road has been submitted for consideration

Horsham District Scouts commented that should development occur at Newhouse Farm. Horsham District Scouts estimate that these proposals will generate an eventual demand for 50 young people for scouting activities. The site is outside the catchment of the 1st Roffey Scout Groups and therefore a new Scout Group would be needed. Long term planning for the necessary land and building needs to be considered before on-site development commences.

Statutory Consultees

Southern Water commented that it has undertaken a preliminary assessment on the proposals for 300 dwellings at Land at Mercer Road which has highlighted that the existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. The proposals will generate a need for reinforcement of the wastewater network and will be provided through the new infrastructure charge to developers. Occupation of development will be phased to align with the delivery of sewerage infrastructure in liaison with the service provider and controlled through planning policies and conditions.

Site Promoter

The site promoters of the allocation of Land North of Horsham, have submitted two separate representations to the Regulation 18 Consultation. The first sets out the potential to increase the dwelling yield within the consented area of the Outline Planning Permission (OPP) and the second relates to Additional Land within L&G's 'land interests'. The summarised representation regarding the Additional Land has been included in the 'Object – North Horsham' summary.

Uplift in the OPP

It considers that the existing allocation set out in the HDPF should, at least, be brought in line with the OPP (i.e. 2,750 units) but also that the site can deliver a greater number of units than the OPP envisaged. L&G considers that the future allocation in the emerging Local Plan should include 500 additional units, taking the total to 3,250 units.

They consider that through the review of the Local Plan, the text of the existing Policy Allocation relating to Land North of Horsham should also be updated and has proposed amendments to the current policy wording, attached to the representation in Appendix Two.

They support all the growth options tested through the SA as they include the additional 500 units through densification of the site and highlight that the increased delivery to 3,250 units can be delivered by 2033/34 which has been demonstrated through their trajectory. They consider that additional growth within the allocation represents an 'easy win', particularly as substantial infrastructure is already committed through the OPP, including highways improvements, new economic development and schools, therefore the risk of non-delivery is low. Additional

development at North Horsham also supports the economic growth of Horsham town, the economic potential of the site itself (ensuring its viability) and the potential for future provision of the railway station.

The density exercise undertaken on behalf of the site promoters concludes that the site can deliver 3,442 units based on maximum densities approved through the OPP, but an increase to 3,250 units represents an appropriate increase, making the best use of land without overdevelopment.

The Social Infrastructure Capacity Assessment considers the additional demands on education, healthcare, open space and leisure requirements and other community facilities created by an additional 1,165 people. The Assessment concludes that the additional demand arising from the 500 extra units could be met within the facilities provided for by the OPP. The Assessment has identified that the OPP does not provide the necessary requirement for allotments, outdoor sports facilities and indoor facilities, but this shortfall is seen regardless of whether 2,750 or 3,250 units are considered. They however note that there is the potential to review the balance of different types of open space and play/sports provision.

They highlight that the Transport Strategy, demonstrates that the site offers opportunity to deliver a further 500 units (through increased density) where a sustainable new community is already being created and to enhance this further. Adding that, increased homes will potentially improve the viability for further bus services, the business case for a new station plus improved shops and facilities. Stantec concludes that given the opportunities to internalise the trips and other changes and influences, a further 500 homes could be accommodated at Land North of Horsham site.

They support flexibility in emerging Local Plan policy to allow for consideration of local need when determining the level of affordable provision and tenure mix on a site-by-site basis, as well as overall housing mix. They support policy which encourages the provision of retirement/specialist care housing.

They consider that the allocation of units within the main settlement hierarchy on land that has already been released for built form will make a significant contribution towards meeting HDC's future housing need.

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| Object – North Horsham | |
| Number of Comments | 6 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>A number of individuals objected to the potential allocation at North Horsham, citing the following reasons:</p> <ul style="list-style-type: none"> - Small scale should mean small scale at 5% of the existing houses – amongst others, North Horsham exceeds this - The site has very poor sustainable transport links - Cycle route needs to be improved and additional crossing of the A264 to Horsham - The site will adversely affect Warnham LNR directly south of the A264 with water run-off and spillages - Objection to the site Land at Mercer Road site which effectively enlarges the North of Horsham site. Given that permission has been granted for the construction of an enormous industrial incinerator in this location, residential development should be out of the question | |

- The site is also on the outskirts of Warnham which has already been identified for additional housing
- Smaller sites do not deliver the leisure and open space facilities that larger sites deliver
- Larger sites are preferable to smaller sites because of the impact on existing residents

Site Promoters

The site promoters of the allocated site, Land North of Horsham, have submitted two separate representations to the Regulation 18 Consultation. The first sets out the potential to increase the dwelling yield within the consented area of the Outline Planning Permission (OPP) and the second relates to Additional Land within L&G's 'land interests'. The summarised representations regarding the Uplift in the OPP has been included in the 'Observation – North Horsham' summary.

The Additional Land

- The Additional Land comprises five land parcels that are not within the OPP or allocated site but have been submitted to the SHELAA which has found the sites not deliverable
- They disagree with HDC's 'policy on' approach and conclusions in the SHELAA and the exclusion of the Additional Land within the Regulation 18 Local Plan as a potential housing allocation.
- The Additional Land could contribute to wider housing needs, consistent with the OPP and L&G's aspirations and could provide for up to 500 new homes.

They highlight that further work has been commissioned to support the OPP and will include assessment of the Additional Land and further technical evidence can be presented at Regulation 19 Stage.

They support the development principles set out at Strategic Policy 15 and considers that the development of the Additional Land would meet each of the criteria with explanations for each of the 9 criteria provided

They consider that the representations submitted to the Council set out that there are no constraints to bringing forward the Additional Land in terms of access, topography and ground conditions; contamination; archaeology and heritage; utilities; ecology; flood risk; air quality or noise.

Their highways consultants, have found that there are no highways or access constraints that would prevent the delivery of strategic scale development at the Additional Land. Further to this, they explain that they have considered whether there is sufficient transport infrastructure to support development at the Additional Land and conclude that the current highway mitigation proposed to be delivered through the OPP would accommodate development at the Additional Land, subject to a number of assumptions relating to the type of trips being undertaken (relating to residential trips to work, personal business trips and shopping trips).

They consider that additional homes through the allocation of the Additional Land will generate further demand for the consented scheme's facilities, locate new homes in an already established sustainable location and will be able to take advantage of the social and physical infrastructure investment committed through the OPP.

As master developer, they are committed to linking the Additional Land into the overall masterplan of the Land North of Horsham and intends to deliver a high quality scheme, focused on

the following core principles of place making: Inclusivity, Community, Identity, (Enduring) Quality, Welcoming and Sustainable.

They consider that:

- It has been demonstrated that the Additional Land can be delivered within the Plan period;
- The calculation of net developable area exercise has concluded that the Additional Land could yield up to 500 units and provide open space, woodland and landscape buffers that would provide a strong defensible boundary to the countryside beyond; and
- The allocation of the Additional Land (along with the uplift to the OPP) could deliver 3,750 units at North Horsham and would be consistent with their core principles.

The site promoter for another site acknowledges that the draft HDLP has not fully considered the Rusper Road site (SA285) it is promoting within the Site Assessment document as suitable for housing or employment, but urges the Council to consider this site fully in the emerging Local Plan and Site Assessment document. The following qualities of the site are highlighted:

- The site was identified for 30 units and as being available and suitable for development within 6-10 years in the 2014 SHELAA
- The site consists of 0.5ha of previously developed land and is currently occupied by the Gospel Trust Meeting Hall, two houses and a business premises
- There are multiple access points to the site which all lead from Rusper Road
- The site is in a highly sustainable location lying >30m from Littlehaven Railway Station and the nearest bus stop is >20m from the site
- The site is 1.5 miles from Horsham town centre
- The site is suitable in terms of noise, with the northern boundary being screened from the railway line by dense mature tree screening and suitable noise mitigation could be implemented
- The flat tarmacked landscape and ground conditions are suitable for the development of housing
- There is unlikely to be contamination on the site and it is not within an area of flood risk
- The site is considered to be available, developable and deliverable

The Woodland Trust raise concern about the proximity of Land around Mercer Road, Warnham Station, to areas of ancient woodland. In respect of sites adjacent ancient woodland, request a minimum buffer of 50m between development and the ancient woodland (including construction) unless a smaller buffer can be clearly justified. The buffer should be larger for significant engineering operations or after-uses that generate significant disturbance. The intense pressure for development makes the protection of ancient woodland and veteran trees all the more important and the regard to be given to para 175 of the NPPF.

Partridge Green

| Support – Partridge Green | |
|--|---|
| Number of Comments | 4 |
| <p>Summary of Comments</p> <p><u>Members of the public</u></p> <p>One member of the public commented that the additional 200 houses seem reasonable but noted the lack of facilities in the village.</p> <p><u>Site promoters</u></p> | |

The promoters for Land at Church Road (SA320) were supportive of the potential allocation of their site. They note that:

- They agree that the site is sustainable and located near to local facilities
- 80 homes could be delivered
- Development would be landscape-led and take into account flood and drainage issues
- The site assessment report does not correctly refer to their site and the buffer zone of 150m should be 3m.

The same promoter supported the housing figure of 200 units but believed that this should be a minimum.

The site promoter for Land at Dunstons Farm (SA433) supported the potential allocation of the site for 120 homes, noting that a previous planning application had been submitted (18/1814) and that a number of key studies have been undertaken in support of development on the site.

The site promoter for land north of the Rise (SA274) supported the identification of the site and the allocations for the village in general. They expressed that a scheme for 55 homes can be prepared which respects the local gap and listed buildings. They do recommend a figure of 250 homes as a target which in their view could be accommodated and would support local infrastructure and services.

| | |
|---|-----------|
| Object – Partridge Green | |
| Number of Comments | 34 |
| Summary of Comments | |
| <p><u>Members of the public</u></p> <p>Comments on the overall quantum of development in Partridge Green included:</p> <ul style="list-style-type: none"> - Brownfield development such as at the Huffwood Trading Estate would be preferable - Greenfield sites should be protected - A smaller target would be more appropriate for a settlement of the nature of Partridge Green - There are existing traffic problems and new development would be detrimental - The village has limited facilities and transport services are poor (the site assessments are misleading in this respect) - Air/light pollution would be detrimental to people and wildlife. - The neighbourhood plan should set out the strategy for development - Waste water infrastructure is under-capacity and causes flooding and health issues. - People live in Partridge Green for its rural character and this would be impacted - There is a shortage for building material across the country and the sites are in a mineral safeguarding area. - The proposed developments are not small in scale <p>Particular comments on land north of the Rise (SA274) included:</p> <ul style="list-style-type: none"> - Cars would have to access Littleworth Lane which is very busy and dangerous to negotiate at times - Planning permission was previously refused (and by appeal) for impact on character, listed buildings, dwelling mix and location. - Development would urbanise the area <p>Particular comments on land west of Church Road (SA320) included:</p> | |

- Biodiversity/wildlife would be harmed
- Cars from the development would add to traffic on Church Road/B2135
- Development has already been refused on access grounds
- The site is not part of Partridge Green but historically part of Jolesfield
- It is part of a proposed Local Gap between Jolesfield and Partridge Green in the West Grinstead Neighbourhood Plan

Particular comments on land at Dunstons Farm (SA433) included:

- Access would be on the High Street, which would increase existing traffic problems
- Previous planning application was refused and issues persist – impact on listed buildings, impact on semi-rural setting, not essential to countryside location
- Biodiversity/wildlife would be harmed

Particular comments on land at Dunstons (SA634) included:

- Access would be on the High Street, which would increase existing traffic problems

Parish Council

West Grinstead Parish Council stated that they consider a threshold of 50 homes for allocation of development to be too low, this is a size of site that should be left to Neighbourhood Plans. A threshold of 200 homes was instead suggested. They also objected to an increase of the settlement housing allocation for Partridge Green to 200 on grounds that it is, in effect, a doubling of the figure advised in 2019 of 110.

The Parish Council identified that brownfield land should be prioritised and they have been working on residential development at the Huffwood Trading Estate as part of the production of the Neighbourhood Plan.

Pulborough/Codmore Hill

| Support– Pulborough/Codmore Hill | |
|--|----------|
| Number of Comments | 3 |
| Summary of Comments | |
| <u>Members of the public and community groups</u> | |
| <u>Site Promoters</u> | |
| The site promoter for Land at Greendene Nurseries (SA122) while supportive of the identification of their site, made the following comments: | |
| <ul style="list-style-type: none"> - Smaller sites such as theirs would be important in ensuring needs are met - They are open to discussions regarding upgrades to the pedestrian railway crossing - 30 dwellings would not be appropriate for a 2.4 hectare site - The site available has now been extended to 3.71 hectares and would be capable of providing 90 homes relatively quickly - Impact on biodiversity would be mitigated against - The impact on the heritage asset should be negligible | |
| The site promoter for Land at Highfields (SA556) made the following points: | |
| <ul style="list-style-type: none"> - The site can accommodate 25-28 units and can be brought forward almost immediately and would be varied in terms of mix, size and type - In relation to objectives SA6,7,9 and 10 the assessment needs to be updated as they are too negatively assessed. | |

- The promoters have been working with Pulborough Parish Council since May 2017 as part of the Neighbourhood Plan process.

The site promoter for land at New Place Farm (SA445) whilst supportive of the identification of their site reiterated that the site was being promoted for 170 units not the 120 units identified.

They made a number of comments, including:

- They disagree with the reduction in capacity on landscape grounds and have undertaken evidence to explain why this is the case
- The Council's LCS has not taken into account evidence submitted by the site promoters as part of the site assessment consultation and the site assessment should assess landscape as neutral
- The site is not subject to ecological constraints, there is opportunity for biodiversity gains and the site is well situated in relation to sustainable modes.
- The description of the site in the site assessment is fair
- It is not clear why the bat sustenance zone reference is included in archaeology/ heritage section
- The SA is overly negative in relation to a number of aspects and should be amended.
- The BUAB should be amended to include allocated sites.

Observation – Pulborough/Codmore Hill

| | |
|---------------------------|----------|
| Number of Comments | 2 |
|---------------------------|----------|

Summary of Comments

Statutory Consultees

The South Downs National Park Authority expressed concerns over landscape impact to the National Park in relation to a combination of sites in Pulborough and stated that they would welcome further discussions and the provision of further evidence.

Natural England commented that that, respectively, consideration of development of sites SA445 and SA556 and on the Upper Arun SSSI and Pulborough Brooks SSSI was needed, together with mitigation.

They also commented that development of the site could impact land linked to the Mens SAC and that any allocation should be linked to the Sussex Bat SAC protocol.

Objection – Pulborough/Codmore Hill

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|---------------------------|-----------|
| Number of Comments | 17 |
|---------------------------|-----------|

Summary of Comments

Members of the public

Members of the public made the following comments about the principle of development in Pulborough:

- The proposed developments are not small in scale
- Infrastructure is already under stress
- There are existing issues with flooding

Specific comments about land at Greendene Nurseries (SA112) included:

- The A29 is part of the major road network and the proposal would be detrimental by adding traffic on a busy road. The nearby Pigeon Gate Bridge is already dangerous.

- The site should not be developed until neighbouring land can come forward alongside this site as part of a cohesive development that would meet the needs of the community.
- The site is not supported in the draft Neighbourhood Plan.
- Pedestrian access to the services in Pulborough would involve crossing the A29 and this would be dangerous

Specific comments about land at New Place Farm (SA445) included:

- The site is heavily wooded and has a pond and these environmental/biodiversity benefits should not be ignored
- The 'Country Park' proposed is too small and should be increased in size and development on the site reduced.

Parish Council

Pulborough Parish Council stated that SA112 was rejected by the steering group preparing the Neighbourhood Plan. They explained that any further urbanisations between Codmore Hill, Pulborough and the railway line, should be carried out in a coordinated and not piecemeal fashion.

Site promoters

The site promoters for Land at Toat Café and Whitelands (SA677) submitted that their site was available for employment/leisure uses, with some small-scale enabling residential development. They indicate that the smaller sites such as this can help meet district-wide needs, the site is well located with good access.

The site promoters for land at Auriel Grange felt that the BUAB for Pulborough should be extended to include their site as sites abutting the BUAB boundary for Pulborough are sustainable and within walking distances to services. In their view, bringing smaller sites like this would relieve pressure for large allocations.

The site promoters for land at Pulborough Glebe (SA087) felt that their site should be allocated. Their explanation included:

- The site is in a highly sustainable location, close to Pulborough
- The site has been assessed as unfavourable impacts (with potential for mitigation) so it is capable of accommodating development
- 10 homes can be accommodated without being detrimental to Church/Conservation Area

The site promoter for land to the north of Codmore Hill Lane objected to the non allocation of their site on the following grounds:

- it is suitable and free from constraints
- it would be able to make an immediate contribution to housing delivery
- it abuts the settlement boundary which should be extended
- it would be appropriate in scale (3/4homes) and not incumber other development

Promoters on behalf of a car showroom on London Road submitted their site for consideration, noting that:

- it lies within the built up area of 2nd tier settlement
- existing sites will need to be intensified to meet future economic needs and flexibility – including for quality B1
- additional residential development is needed to meet housing needs and smaller sites can contribute to this
- The site is close to the strategic road network and in a good location for employment uses

Rudgwick/Bucks Green

| Support– Rudgwick/Bucks Green | |
|---|---|
| Number of Comments | 4 |
| <p>Summary of Comments</p> <p><u>Members of the public and community groups</u></p> <p>Rudgwick Preservation Society supported the identification of SA442, identifying a sustainable location and that the site is underused. It did identify the proximity of listed buildings and suggested measures would need to be in place to ‘buffer’ the impact.</p> <p><u>Site Promoters</u></p> <p>The site promoter for land north of Guildford Road (SA574) was supportive of the identification of its site as a potential allocation. Whilst supportive and reinforcing the sustainability of the site – including with anticipated extra bus services to Horsham and Guildford, they felt that the site was assessed by the Sustainability Appraisal too negatively, explaining that a number of potential impacts can be avoided or mitigated with planned development of the site, including in relation to landscape and the historic environment and this should be refined.</p> <p>The same site promoter identified uncertainty of the deliverability of site SA442 – in relation to access and trees/ancient woodland which they believed highlighted the importance of allocating SA574.</p> | |

| Observation – Rudgwick/Bucks Green | |
|--|---|
| Number of Comments | 4 |
| <p>Summary of Comments</p> <p><u>Members of the public and community groups</u></p> <p>Rudgwick Preservation Society indicated support for the Neighbourhood Plan and hoped it would be ‘made’ before the adoption of the Local Plan.</p> <p><u>Site Promoters</u></p> <p>A site promoter commented that there are small sites adjacent to Rudgwick which are sustainably located that could come forward more quickly than the shortlisted sites. Doing so would relieve pressure on larger sites to come forward.</p> <p><u>Statutory Consultees</u></p> <p>Waverley Borough Council noted the housing allocation of 50 given for Rudgwick and identify that larger site (SA574) sits on A281 that could have an impact going northwards into Waverley. They note that cumulatively the identified sites exceed 50 homes.</p> <p>Surrey County Council noted that sites in Rudgwick lie close to roads that feed into Surrey.</p> <p>Natural England commented that that consideration of development of sites SA442 and SA574 and on the Upper Arun SSI was needed, together with mitigation. They also noted that SA442 lies adjacent to an area of ancient woodland.</p> | |

| Objection – Rudgwick/Bucks Green | |
|---|----|
| Number of Comments | 11 |
| <p>Summary of Comments</p> <p><u>Members of the public and community groups</u></p> <p>Comments objecting to the general principle of development in Rudgwick included:</p> <ul style="list-style-type: none"> - Traffic and speeding is a major problem, including by HGVs - Development would increase flood risk - Existing infrastructure is inadequate (doctors, parking, etc.) - Loss of green space will be to the detriment of residents and wildlife - Other sites (e.g. Watts Corner and East of Church Street/A281 Junction) would be preferable if development had to occur. - Development would merge Rudgwick and Cox Green <p>Comments objecting to the potential allocation of SA442:</p> <ul style="list-style-type: none"> - Access would be inappropriate - Adjacent trees would be impacted <p>Rudgwick Preservation Society commented that development of SA574 would destroy the viability of Canfields Farm and would suburbanise Bucks Green. It was also noted that the site could accommodate greater than the 50 units identified for Rudgwick/Bucks Green. Access is potentially dangerous and development could cause particulate/noise/light pollution and a buffer would need to be created. Drainage is poor and would need to be addressed.</p> <p><u>Parish Council</u></p> <p>Rudgwick Parish Council identified general concern with housing targets, expressing that the HDPF should only be subject to limited amendments and that infrastructure provision is lacking.</p> <p><u>Site Promoters</u></p> <p>The site promoter for south of Guildford Road(SA578) indicated that their site is available for development for up to 65 homes and supporting documents have been prepared to support the delivery of the site as part of a recent outline application. They dispute the overall conclusions for the site and note that:</p> <ul style="list-style-type: none"> - The site is well related to the urban edge of Rudgwick - The site is not subject to landscape and biodiversity designations and development could deliver biodiversity net gains. - The site is not constrained by a number of other aspects (e.g. environmental quality, archaeology, etc.) - The impact on heritage assets would be very minor. - The development presents an opportunity to improve access/road safety. - Development would provide new public open space. <p>The site promoter for south of Bucks Green Place (SA731) noted that the combined total of the two identified sites was greater than the 50 identified as being required. Given that one site has the capacity to deliver 120 units, it was felt that this site would over-deliver and therefore should be discounted. In reference to their site, they expressed that:</p> <ul style="list-style-type: none"> - The site is sustainable and self-contained - The landscape assessment is incorrect and the impact would be less than identified, additionally visual mitigation measures would be introduced to reduce landscape impacts and countryside encroachment | |

- The site would deliver fewer than 10 homes and is of the correct scale
- A linear form of development can be achieved and would be appropriate.
- The layout of the site would allow flood risk to be minimised.
- The site assessment should be updated based on new information provided
- There is a need for housing and this site can help address this.

The site promoters for Land East of Woodfalls Manor (SA327) disagreed with elements of the site assessment and identified measures that would lessen the impact of development. This includes:

- The site should be assessed as previously developed land as it was originally within the curtilage of Woodfalls manor.
- There are no shrubs on the site
- The site was partially cleared in September 2019 and has foot access
- Services are less than a mile away and nearby bus service gives access to larger settlements
- There are not well defined hedges and development would not cause arboricultural harm
- Ecological surveys have been undertaken and no endangered species were found
- The site qualifies as a windfall site
- A new BUAB could have a defensible boundary.
- Access has been previously agreed by WSCC as part of a previous application
- The site has not been visited

The site promoters for Swallow Ridge (SA669) thought that the assessment for their site was negative, that the threshold for allocated sites should be set at 5 units and that there should be an allowance for small scale development on settlement boundaries. It was also stated that a previous application and appeal had determined that there were no technical constraints to delivery and the Ash Tree is of low quality and is a health and safety risk. It was therefore felt that the assessment did not reflect information held on the site and that access can be provided.

The site promoters for the western part of site Land at Junction of Church Street/Watts Corner, Rudgwick (SA434) indicated that the site had been made available for development.

Rusper

| Support – Rusper | |
|---|---|
| Number of Comments | 1 |
| <p>Summary of Comments</p> <p><u>Site Promoter</u></p> <p>The site promoters of Rusper Glebe (SA080) welcomed the identification of their site in the Council's Site Assessment Report and highlight their strong representations that were made to the Regulation 16 Rusper Neighbourhood Plan that proposes to designate the glebe as Local Green Space.</p> <p>The Chichester Diocese objects to the proposed designation of Local Green Space on the following grounds:</p> <ul style="list-style-type: none"> - As the glebe is wholly within the Conservation Area, it should be excluded as a potential area of LGS in accordance with its own criteria - There are factual inaccuracies in the Neighbourhood Plan's assessment - Failure to comply with NPPG criteria - The designation of LGS before considering the housing requirements under the local plan review fails to accord with the NPPF | |

The representation also highlighted the inconsistencies of the Neighbourhood Plan's assessment of the glebe with the assessment undertaken for the Council's SHLAA.

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| Observation – Rusper | |
| Number of Comments | 2 |
| Summary of Comments | |
| <p><u>Statutory Consultees</u></p> <p>Natural England acknowledged that smaller scale development may not come forward in settlements such as Rusper, given the potential for strategic-scale development in close proximity if allocated. However, Natural England highlight that comments can be provided for such settlements, including Rusper, should sites be pursued in this location.</p> | |
| <p><u>Other Consultees</u></p> <p>Gatwick Airport Limited commented that any small sites in Rusper must be compatible with the future development of Gatwick Airport and that exposure to aircraft noise would mean that noise mitigation measures may be necessary.</p> | |

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|--|----------|
| Object – Rusper | |
| Number of Comments | 9 |
| Summary of Comments | |
| <p><u>Members of the public and community groups</u></p> <p>Comments received included:</p> <ul style="list-style-type: none"> - The allocation of small and large sites are different processes – a potential large allocation should not mean that small sites are not allocated and settlements such as Rusper not given a target. - There should not be any development near Cripplegate Farm due to traffic, access and privacy concerns. | |
| <p>The <u>Woodland Trust</u> raise concern about the proximity of Pucks Croft Cottage & Land south of Rusper (SA737) to areas of ancient woodland. In respect of sites adjacent ancient woodland, request a minimum buffer of 50m between development and the ancient woodland (including construction) unless a smaller buffer can be clearly justified. The buffer should be larger for significant engineering operations or after-uses that generate significant disturbance. The intense pressure for development makes the protection of ancient woodland and veteran trees all the more important and the regard to be given to para 175 of the NPPF.</p> | |
| <p><u>Parish Council</u></p> <p>Rusper Parish Council suggested that no new sites should be allocated that are not already identified or are brownfield sites. Densities should be increased rather than greenfield land lost and this would align with climate change objectives.</p> | |
| <p><u>Site Promoters</u></p> <p>The site promoter for Land adjacent to Pucks Croft Cottage (SA737) considers that their site could be allocated for 6 dwellings (or the built up area boundary extended) and has submitted a reduced site area available for development (red line boundary). The site promoter considers this site can meet the needs of Rusper and provide public open space/landscape improvements. It was stated that the site is sustainably located, not subject to constraints, well contained and that</p> | |

development could be delivered within 5 years. All units would be delivered outside of the emerging Local Green Space allocation in the progressing Neighbourhood Plan. In the Regulation 18 Consultation

The site promoter for Land Millfields Farm identified that their site was a collection of linked land parcels ("Areas 1, 2 and 3"). Area 1 immediately adjoins the built up area boundary of the village and is brownfield land. It was explained that Area 2 site formed part of SA465 in the original SHLAA and was identified as being able to accommodate 12 units, was well located and relatively unconstrained. It was unclear to them why this site has been reduced to exclude Millfields Farm and Areas 1 and 2 would be a logical site to allocate due to its location and sustainability. Area 3 could be used for landscape and biodiversity improvements.

The same site promoter identified the importance of smaller sites coming forward to meet housing targets noting that they can be built out quickly and deliver housing sooner than large scale allocations.

The site promoter for Land at East Street (SA465), the following issues were raised:

- It is noted that the site has been identified as having potential for development, but has not been allocated in the Regulation 18 Draft Local Plan
- A planning application for 6 units has recently been submitted on the site – the Highways Authority has some concern regarding the access and it is likely that the site will have its own access rather than a shared access with the adjacent consented site
- The site is adjacent to approved development (which should be included within the built up area boundary) and a planning application (reference DC/19/2203) has been submitted on the site
- The small site size threshold should be lessened and smaller sites (less than 1 hectare) need to be identified
- Development would be a natural extension to Rusper on a sustainable and self-contained site
- Development would not cause coalescence or landscape impacts
- The site promoter continues to explore options for vehicular access to meet the demands of the Highways Authority
- Despite the needs assessment carried out by the Parish Council, there is a need for housing in the district and the need in Rusper is therefore higher than the 8 units identified by the Parish Council.
- The West of Crawley proposal would not meet the needs of the village and development needs to occur in Rusper independent of whether West of Crawley comes forward.
- An identified target should be provided for Rusper and their site should be among the allocations.

Slinfold

| Support – Slinfold | |
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| Number of Comments | 2 |
| <p>Summary of Comments</p> <p><u>Members of the public and community groups</u></p> <p>A comment was received that supported the non-identification of SA576 and SA722 on grounds of landscape impact and impact upon the community.</p> <p><u>Site promoters</u></p> | |

One comment was received that supported the extension of the built up area boundary to include the garden of a residential property.

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| Object – Slinfold | |
| Number of Comments | 8 |
| Summary of Comments | |
| <u>Members of the public and community groups</u> | |
| Members of the public commented that: | |
| <ul style="list-style-type: none"> - It is unclear why Slinfold does not have a housing requirement - The Site Assessment Report does not correctly identify the presence of flooding on site SA576 and SA722. | |
| <u>Site promoters</u> | |
| The site promoter for sites at Stane Street (SA576) and Clapgate Lane (SA722) sought allocation of their sites, expressing: | |
| <ul style="list-style-type: none"> - Development would not prevent or prejudice development of other sites. - Development would help to meet identified local needs. - The level of expansion would be appropriate to the size of Slinfold and adjoins the settlement - Landscape would be maintained and enhanced. - Smaller sites can be delivered quickly and their site is available - There are no constraints to prevent development - The sites were promoted individually and should have been separately assessed and should be reappraised to reflect technical information provided. | |
| The site promoters for Land to the East of Hayes Lane, a site allocated in the Neighbourhood Plan, felt the existing allocation did not optimise the amount of development that could occur on the site due to the presence of a buffer zone. They stated that the buffer could be reduced in size to deliver 50-60 homes and community benefits and that such an allocation would assist the Council in meeting its needs as well as the needs of its neighbours. | |
| The site promoter for Land at Crosby Farm (SA734) objected to the non-identification of their site, explaining that: | |
| <ul style="list-style-type: none"> - All smaller scale development would be unlikely to deliver new infrastructure but the site is sustainable as it is close to services and transport links - The Site Assessment Report does not recognise that this site has a site allocation immediately to its west. - Landscape work has been undertaken that supports development of the site and development could include a green buffer that includes formal and informal open space. - The Site Assessment Report does not explain how the Conservation Area designation impacts the site. - Smaller settlements have received a housing requirement | |

Small Dole

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|---|----------|
| Support – Small Dole (Henfield Parish) | |
| Number of Comments | 2 |

Summary of Comments

Site promoters

The site promoters of Land West of Shoreham Road (SA538), while supporting the identification of their site, indicated that their site should be allocated for 40 homes, which means that the housing requirement for Small Dole should also be raised and both identified sites should come forward to help address unmet need. In reference to their site, they state that:

- It would be the most beneficial site.
- Layout had been revised to address landscape concerns and development would be less than previously refused.
- The site is close to services and can provide formal and informal recreation.
- Amenity of existing residents would be preserved.
- The site should be assessed more positively than the Site Assessment Report indicates.

Parish Council

Henfield Parish Council was generally supportive of Site SA505 for 12 homes, but felt that it would need to be proved that the existing nursery is not viable and that access would need to be established.

Observation – Small Dole (Henfield Parish)

Number of Comments

2

Summary of Comments

Members of the public and community groups

A comment was made that Table 1 in the plan should be amended with respect to Small Dole, to identify the capacity of the identified sites which collectively exceed 20 units.

Site promoters

The site promoter for SA689 queried as to why their site, which is proposed to be allocated in the Upper Beeding Neighbourhood Plan but relates to Small Dole is not referred to either in the numbers for Upper Beeding or Small Dole. They also identify inconsistency in that for some settlements site with capacity of less than 50 homes have been named in the table whereas for some places this is not the case. To avoid this situation it is suggested that sites with capacity of 20 units or more are identified.

Object – Small Dole (Henfield Parish)

Number of Comments

27

Summary of Comments

Members of the public and community groups

On the general principle of development in Small Dole comments were made that included:

- The water table in Small Dole is very high and development would cause additional flood risk
- The sites identified have been rejected as part of the Neighbourhood Plan process
- The village has limited infrastructure (sewage, doctors, schools, etc.)
- Residents are reliant on cars for travel as bus service is poor (hourly to Henfield and once a week to Worthing)
- The sites are not sustainably located

- Development would involve the loss of quality agricultural land
- Development would have a negative landscape impact and the sites are visible from the National Park and would add light pollution and breach the dark skies policy
- Construction traffic and processes would have a negative impact on existing residents.
- Flood risk would increase, as would pollution.
- The Neighbourhood Plan allocated a site in Upper Beeding Parish to meet needs.
- The Parish Council and local community should be allowed time to bring forward extra sites if housing target is increased.

The following comments were made in relation to Land at Highdown Nurseries (SA505):

- The Site Assessment Report incorrectly names New Hall Lane and is not available for access by its owner nor is it in a condition that would support additional traffic
- Access via the Beeches has not been made available by the owner
- The residents of the Beeches bungalows were not told that development could occur on the site and the sale literature was therefore misleading
- The adjacent road is busy and constitutes a safety hazard
- It would impact on the amenity of nearby residents (noise/light pollution, height)
- The main sewer in New Hall Lane backs up and is not sufficient to handle additional capacity.
- Adjacent development struggled to be sold, suggesting lack of need for housing.
- Access is not sufficient for emergency vehicles.
- It is not clear what type of homes the site would accommodate.

The following comments were made in relation to Land West of Shoreham Road (SA538):

- The site is adjacent to a busy road and access would be dangerous
- Wildlife would be impacted
- Planning application refused on grounds of landscape and sustainability
- Brownfield sites within Henfield should be given priority.

Parish Council

Upper Beeding Parish Council identified that Small Dole has poor service provision, their Neighbourhood Plan is advanced and it is unreasonable to disregard the Neighbourhood Plan when it has only been recently prepared. They noted that both sites would be visible from the National Park and affect their night skies policy and highlighted that a planning application for development on SA538 was refused. Development would also encroach into the countryside, increase pollution and damage the environment.

Henfield Parish Council did not support the identification of SA538 noting that limitations would prevent it from developing only on its east side and that there were better options available.

Site promoters

The site promoter for Land at Oxcroft Farm (SA689) [in Small Dole but in Upper Beeding Parish] noted that their site was allocated in the Neighbourhood Plan that had passed examination. It was their belief that the Local Plan should refer to their site and also that the table should refer to Small Dole being in both Henfield and Upper Beeding Parishes.

Southwater

| Support – Southwater | |
|----------------------|---|
| Number of Comments | 1 |

Summary of Comments

Site promoters

The site promoter for Southwater Glebe welcomed the inclusion of their site as part of the wider potential strategic allocation for West of Southwater.

Observation – Southwater

Number of Comments

3

Summary of Comments

Members of the Public and Community Groups

It was expressed that the Council should focus more on suitable land around small towns and large villages, such as Southwater and the Hamlet of Tower Hill, which being within the southern part of the A24 by-pass is closer to Horsham town centre than even the majority of Horsham's existing housing. This will assist in meeting the District's housing need in a sustainable manner and ensuring there is an appropriate mix of housing and employment.

Object – Southwater

Number of Comments

23

Summary of Comments

Members of the public and community groups

Comments on the general principle of development in Southwater included:

- Any development would stretch infrastructure and increase flood risk.
- Development should not exceed that stated in the Neighbourhood Plan.
- Southwater should not become a town.
- There was local opposition to development
- Prefer to see a single large scale site developed (say 10,000 units), rather than a large number of smaller (100-200 units) developments in existing settlements

Specific comments relating to potential development at Horsham Golf & Fitness are covered separately.

The Woodland Trust objected to ancient woodland areas being included in sites allocated as suitable for development explaining that development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted.

Plymouth Brethren explained that they would like to see places of worship promoted through local plans, along with other community uses such as care homes and burial grounds.

Parish Council

Southwater Parish Council stressed the point that the Parish has seen a lot of growth and the 1200 identified for Southwater was seen as excessive.

Site promoters

A number of site promoters objected to the non-identification of their site as a possible allocation or to the Council's decision to limit identification of smaller sites should a strategic level site be allocated in Southwater.

The site promoter for Land at Woodfords, Southwater (SA743) expressed that their site should be considered further for allocation, noting some of the positive aspects included within the Council's Site Assessment. They did not consider it correct to not include smaller allocations due to the level of identified house building in Southwater, given the district-wide need for housing and the size of Southwater. They also expressed that the site is sustainably located, infrastructure issues were not insurmountable and that multiple housing choices were need.

The site promoter for Stoneleigh and Griggs, Tower Hill [within Southwater Parish] (SA330 and SA038) felt that further consideration should be given to smaller sites to ensure a continuous supply of housing land in the short and medium term. It was expressed that the aforementioned sites were sustainable and could be delivered in the short term and were not subject to constraints (such as landscape) to prevent development. It was mentioned that the site could also deliver mixed use development to prevent out commuting.

The site promoters for Rascals Farm (SA701) [Shipley Parish but bordering Southwater] queried why their site was not proposed for a housing allocation given that it was assessed positively in the Site Assessment Report, an assessment that they generally support. Though it was in Shipley Parish, this did not preclude development as it would be related to Southwater and HDC should not have narrowed its options in this manner.

The site promoters for The Copse (SA324) identified that their site, which was recently dismissed at appeal but subject to judicial review, felt that their site should be identified for development:

- The approach to the Council not allocating smaller sites (less than 1ha) is not consistent with national policy (NPPF Para 35)– as at least 10% of housing requirement should be identified in this manner and there should not be a minimum threshold of 50.
- Neither the Neighbourhood Plan nor Local Plan seek to allocate small sites.
- The Appeal Inspector confirmed that the site was brownfield and close to services.
- The Appeal did not judge that 15 dwellings could not be accommodated due to tree constraints.
- The site abuts the potential strategic allocation and therefore landscape impacts would not be as assessed.
- The site could come forward with SA408, which would deliver 50 dwellings.

The site promoters for Land to South and West Mulberry Fields (SA725) [western half within Shipley Parish, eastern half within Southwater] commented that they disagree with much of the Site Assessment Report's findings, stating that:

- Services lie within 1.5km and statistics show that people are likely to walk such a distance, there is also a regular bus service
- CIL would be used to contribute to infrastructure
- The trees on site are grown for commercial use and felled – therefore the owners are not obliged to retain the current buffer but tree planning could be provided as part of development. Mature trees would be also retained, providing habitats for bats.
- There would be minimal impact on Ancient Woodland.
- The site is adjacent to ongoing development under the same ownership and is sustainably located.
- The promoters believe that 220 dwellings could be delivered (including affordable) and that the site should be allocated.

The site promoters for Land at Worthing Road [within Southwater Parish but adjacent to Horsham] wanted the site to be allocated for development and included within the BUAB for Horsham. They expressed disagreement with the findings of the Site Assessment Report, stating that:

- The site could deliver 90 homes and is unconstrained
- It is close to services in Horsham and sustainably accessed by footpaths and buses.
- The site would not cause coalescence between Horsham and Southwater – the important gap is between Southwater and Tower Hill which is separated by the A24.
- Does not agree with the landscape conclusion as it does not accept that the railway line contains urban character.
- Only a single site is allocated in Horsham this is a concern given that at least 10% of the housing requirement should be smaller sites and that there is a high housing need.

The site promoters for land at Coltstaple Farm indicated that their site is available for development.

Statutory Consultees

Natural England expressed concern over development affecting ancient woodland.

Horsham Golf and Fitness (SA754)

Number of Comments

95

Summary of Comments

Members of the Public and Community Groups

The majority of respondents commented on the potential for dedicated hockey facilities proposed as part of the Horsham Golf & Fitness Village proposal. In so doing, they shared a range of personal experiences of playing hockey at Horsham Hockey Club in addition to numerous examples of regional, national and Olympic level experience in the game.

In addition, representations were also received from Horsham Hockey Club and England Hockey which reiterated and expanded upon reasons for their support of the proposal and the benefits and popularity of hockey more generally.

Comments from such groups and individuals were numerous and covered issues based on the following themes:

Horsham Hockey Club

- The Club is run entirely by volunteers and has a large and wide ranging membership;
- Horsham Hockey Club is successful, popular, one of the biggest in Sussex and makes an important contribution to the town; and
- The Club is one of the only National League Hockey Clubs not to have its own facilities.

Social and physical benefits of hockey

- Hockey is a family sport and open to people of all ages, genders and backgrounds;
- Hockey provides a great alternative sporting activity;
- Hockey provides socialising opportunities and gives young people a sense of community;
- Hockey provides health and wellbeing benefits; and
- Hockey is a sport available to all, including those with visible/invisible disabilities.

Challenges facing Horsham Hockey Club and its Members

- There is no main hockey pitch in the District and no dedicated centre;
- Horsham Sports Club is not able to meet Hockey Club's needs;
- The retained base at Horsham Sports Club facilities do not meet the needs of the Club;
- The Club relies on the availability of synthetic pitches at local schools rather than facilities owned by them;
- A club house is needed next to the main pitch to facilitate to the social aspects of the game;
- There is a lack of changing rooms at some hired facilities;
- Some hockey skills cannot be taught on the current available pitches;
- The lack of suitable facilities risks having to turn away new members wanting to join and losing talented players;
- The best pitches are at fee-paying private schools. Council-funded schools have out-of-date sand based pitches;
- Logistical challenge for parents getting children to different pitches across the town; and
- Match cancellations are increasingly commonplace because there is no dedicated pitch.
- Hockey has changed significantly over the past 15 years due to the development of new pitch surfaces and innovative rules;
- A new water-based turf allows the sport to be extremely fast and some skills can only be performed on the new surfaces;
- Whilst sport has been considered on other development sites, hockey has not;
- Development in the District has benefited other sports, but not hockey;
- If this site isn't included, another facility needs to be provided and Horsham Hockey Club should be included in the discussions;
- Horsham Gymnastics Club has nearly 1200 members with no gym facilities in the Horsham area – gym facilities would also provide a superb indoor hockey opportunity;
- The lack of suitable facilities is forcing hockey clubs to relocate or close, leading to the rise of super clubs, which Horsham Hockey Club could become;
- Hockey pitches are an issue in the Horsham DC Playing Pitch Strategy;
- Hockey participation is increasing but pitch access is an issue;
- Without dedicated facilities in the town, players could be forced to travel adding to existing traffic congestion.

Support for the Horsham Golf & Fitness Village proposals

- The proposals for Horsham Golf & Fitness Village should be approved to secure a future for the Hockey Club and for the future of hockey in the area
- Increased housing in Horsham will increase the need for additional sports development, alongside Gymnastics, Athletics and Golf
- The development of the Golf & Fitness Village and a dedicated hockey centre should be included in the final Local Plan – disappointment was expressed that it wasn't
- The proposals are considered to offer excellent parking facilities and are easily accessible
- The proposals offer much needed changing rooms
- The proposed pitch will provide players with a better opportunity to reach an elite level
- Given the huge amount of development in the area, this provision would be a positive addition to help with the infrastructure that has fallen behind
- The potential for a gym also helps the Gymnastics Club
- This proposal is the only site submitted to the Local Plan to guarantee a 'social return'
- The proposals are an outstanding example of a developer meeting NPPF principles and requirements
- Proposals could mean that Horsham could become a Junior Regional Performance Centre
- These facilities could open up the sport to more people, helping to address the prohibitive cost of the game

- New facilities can help the Hockey Club build on offering England Hockey initiatives encouraging younger and older players and disability inclusive initiatives

Other sporting matters

Other sporting related comments were made. This included a representation from Horsham Blue Star Harriers, an Athletics Club, affiliated to England Athletics. They commented that the Council has made a commitment to provide facilities to enable Athletics to continue in the District. They noted uncertainty regarding the future of the track in Broadbridge Heath and whilst plans to provide a new track at Christ's Hospital School seemed to offer a viable alternative, they considered this an inadequate solution due to its geography, poor transport links, design issues, restricted availability and security issues. They considered that the proposals on this site offer them a suitable location and consider the benefits of the proposals to include:

- A new permanent home for Blue Star Harriers
- Community use facility for other community groups
- Shared facilities means hockey, gymnastics and golf groups can share costs
- Car parking on site and accessible location
- Park and Ride facility offers connections to Horsham and Southwater
- Enables Blue Star Harriers to grow
- Meets the Council's commitment to provide Athletics facilities

Horsham Leisure Ltd, operators of the facilities at Horsham Golf & Fitness, supports the Horsham Golf & Fitness Village proposals, stating the following:

- The evolution of golf courses to 9 holes supports the sustainable future of the game
- Set alongside a sporting 'hub' incorporating existing clubs supplements the wider vision
- Sport England's 'Sports Club Survey' demonstrates the concept of combining sports clubs to a central hub as the ideal provision for sports
- Developers tend to build (sports) facilities that pay 'lip service' to planning obligations rather than meeting the needs of local clubs and residents, but the vision at Hop Oast is different

The Golf College fully supports the Horsham Golf & Fitness Village proposals to create a new sport and health-based community at the above site explaining that from autumn 2020 the Golf College will establish a new base at Horsham Golf & Fitness Club. The proposals at the Club to create a new sport and health-based community are fully supported by The Golf College, creating new opportunities for The Golf College and creating an emerging sporting hub of District-wide significance.

Other Observations

- The delivery of local amenities is lacking in the housing developments delivered to date;
- The Council should be engaging with the Club as part of the Local Plan;
- Regret that the Council may consider closing the Athletics facility at Broadbridge Heath;
- Any replacement Athletics facility would need to be competition standard and other facilities for long jump, high jump, discus, and javelin and indoor training;
- Consideration would need to be given to providing safe cycle access from central Horsham to Horsham Golf, given the busy Worthing Road; and
- Development in the District has benefited other sports, but not hockey

Relatively little was expressed about the development of non-sporting uses, though a comment was made that is significantly more sustainable than others within the District with good access to services and facilities and much needed sporting and recreational facilities are being offered.

Objections to the Proposed Horsham Golf & Fitness Village

Whilst the majority of respondents support the proposals for the Horsham Golf & Fitness Village, an objection to the development of the site raised the following points:

- The exclusion of the proposal for 500 houses on the current Horsham Golf site is welcomed;
- The site is not suitable for this or any other type of development;
- The proposal is contrary to the Southwater Neighbourhood Plan; and
- Any such future proposals should be rejected

Site Promoters

The site promoters made numerous points collated by the following themes, below:

Key Concerns

- Vision Document for the site developed alongside discussions with WSCC and two public exhibition events, however, there is concern that there has not been a willingness to engage by officers of the Council
- The proposals will create a diverse, health-based community and new facilities for the area
- The site promoters strongly oppose the emerging Local Plan, as it is drafted, and raise concern regarding legal compliance and soundness, specifically regarding the Site Assessment Report, inconsistencies in the evidence base, the Spatial Strategy and the approach to growth and the Sustainability Appraisal
- Given the early stages, there is an opportunity to rectify these deficiencies prior to the Regulation 19 Consultation

The Proposals

The site promoters comment that there are three Masterplan options that have been provided with housing yields between 505-555 dwellings (and potentially more subject to detailed analysis). As well as a core range of facilities, there are a number of community facilities including 9-hole golf course, hockey pitch(es) and athletics track. According to the site promoter, the development is anticipated to generate a need for a 1FE primary school and from discussions with WSCC they have indicated a 2FE school would help meet future needs of the wider local area.

Partnerships with Local Clubs

The development proposals have been undertaken with Horsham-based sports clubs and letters of support from The Golf College, Horsham Hockey Club, England Hockey and Blue Star Harriers Athletics Club. Engagement with Horsham District Cycle Forum has also been undertaken to evaluate off-site PRow connectivity improvements.

It is suggested that this collaborative approach is unique compared with other strategic developments put forward to the Council which they consider offer generic sport facilities. The site promoters highlight the ongoing Christ's Hospital applications, stating that this is an example of how such facilities, planned without the input of local clubs, can lead to unfavourable results.

Site Assessment Report

The site promoters have made the following comments in relation to the Site Assessment report and the assessment of SA754.

- The original site assessment criteria seemed to place an emphasis on community facilities, but this has not carried through to the assessment of the site
- There appears to be a clear bias towards strategic sites and the site assessment methodology has not been applied fairly
- There are faults in the site assessment and unanswered questions relating to sustainability of new settlements, infrastructure considerations, environmental considerations, job creation, sustainable transport measures, site deliverability and the assessment of development quality

Using the Site Assessment Criteria, the site promoter has submitted an assessment of SA754 concluding that the site should have received a combined RAG Rating 'net positive impacts subject to proposed mitigation'.

Coalescence

The site promoters state that the predominant rationale for omitting the site was a perceived coalescence of Horsham and Southwater. The site promoters suggest that whilst there would be landscape impacts, they do not represent an absolute constraint that justifies the red RAG rating and considers that there is a clear misrepresentation of the position at Horsham Golf & Fitness Club, there would be no increased perception of coalescence between Southwater and Horsham than is currently created by the Park & Ride and other urban features.

Access and Connectivity

The site promoters consider that the proximity of the proposed scheme to the existing Park & Ride is an important factor offering fast and frequent connectivity to the town and railway station. A Transport Note has also been submitted that includes an assessment to determine the anticipated level of trips that would be made by public transport, rather than by private vehicle. A further assessment of the connectivity of the site using TRACC software which demonstrates the catchments that can be reached within acceptable walking, cycling and public transport distances, reaching London, Crawley, Gatwick and the South Coast.

Sustainability Appraisal

The site promoters suggest that the ten large site options appear to have undergone a separate assessment process from smaller sites and those sites omitted from the Plan, highlighting that this approach should have been clearly set out and explained. It was commented that if a fair and accurate assessment had been undertaken, SA754 would not have been screened out. Given this, the site promoter has included their own assessment using the same methodology as applied within the SA and suggests that the site scores favourably against the other large site options. The site promoters have commented on each SA Objective from SAO1 to SAO17, detailing how site SA754 could meet these 17 objectives. Additionally, the site promoters comment that:

- The SA is unclear on how it assesses large sites that will predominantly be delivered outside of the Plan period.
- It is unclear whether there is sufficient evidence about whether the other large site options will deliver the infrastructure proposed in a timely manner
- With large numbers of housing being delivered in advance of the required infrastructure, large numbers of private car trips will likely be generated

- The Council will need to reconsider its approach to the Horsham Golf & Fitness Club site as its omission from the SA would not represent an assessment of reasonable alternatives
- Queen's Counsel has been instructed to review the current approach of the Council

The site promoters submitted a number of appendices to support the representation including letters of support from Horsham Blue Start Harriers, England Hockey, Horsham Golf and The Golf College, indicative site layouts based on three different options for development plus details on site boundary conditions, records of communication with council officers and promotional material relating to the site promoters.

In conclusion, the site promoters support the Council in its continued steps to bring forward an up-to-date Local Plan, however, consider there are deficiencies in the current approach and fail to understand why the site has been filtered out. It is also suggested that there are further deficiencies in the assessment of other large site options. The site promoters would like to meet with the Council to provide greater detail on the development proposals.

Steyping

| Support – Steyping and Bramber | |
|--|---|
| Number of Comments | 9 |
| <p>Summary of Comments</p> <p><u>Members of the public and community groups</u></p> <p>Comments in support of the housing requirement of 50 units included:</p> <ul style="list-style-type: none"> - It reflects the constraint of the National Park <p>Comments in support of the identification of Glebe Farm included:</p> <ul style="list-style-type: none"> - Agree that the site is impacted by National Park designation and modest development along southern boundary is appropriate - 50 homes is a viable amount of development and can be accommodated rather than the 190 homes originally put forward - 50 homes would help to meet local need - Access for a larger site would be expensive and reduce the amount of affordable housing delivery <p>It was also suggested that access could be obtained from A283 to minimise impact on neighbouring properties.</p> <p><u>Site promoters</u></p> <p>The site promoters for Land at Glebe Farm (SA742), though supportive of development on the site, made the following comments:</p> <ul style="list-style-type: none"> - The site is developable for 200 homes, not just 50 homes - Landscape work done on behalf of the promoter indicates that visual sensitivity would not preclude development if sensitively designed. - The promoters disagree with the Council's landscape evidence and the Site Assessment Report did not take account of evidence previously provided by the promoter. - Traffic impact on the network would be very limited and would not prevent development of 195 homes coming forward. A transport assessment would be submitted alongside an application. - Pedestrian access would be improved to allow for access to services in Steyping. | |

- Technical work has been undertaken to show that other issues can be overcome.
- The identification of an archaeological site is incorrect. This annotation is likely an erroneous record according to discussions with the County Archaeologist.
- The land is 11.7ha and an additional adjoining site, though not currently available, could be used for a further development phase.

| Observation – Steyning and Bramber | |
|--|----------|
| Number of Comments | 6 |
| Summary of Comments | |
| <u>Members of the public and community groups</u> | |
| There were relatively few observations. One comment suggested that Bramber is distinct from Steyning and should not be considered as one. | |
| Another comment wanted clarity in relation to the numbers (i.e. was the 50 units a ceiling or a floor) as the site was able to accommodate additional housing and there was a local need for additional housing above that identified. Further, it was unclear as to whether CIL receipts would be split between Steyning and Bramber. | |
| Whilst not objecting to development, another respondent commented that appropriate infrastructure would need to be secured to allow SA742 to come forward, and development restricted to avoid flooding and meet local needs. | |
| <u>Site promoters</u> | |
| A comment was made that, given that part of Steyning lies within the National Park, the SDNPA, the Parish Council and HDC need to work together to ensure local housing needs are met. | |
| <u>Statutory Consultees</u> | |
| Southern Water explained that their underground infrastructure crosses the site and this would need to be taken into account and that easements would be required. | |
| The South Downs National Park Authority expressed concerns over landscape impact to the National Park in relation to SA742 and stated that they would welcome further discussions and the provision of further evidence. | |

| Objection – Steyning and Bramber | |
|--|-----------|
| Number of Comments | 11 |
| Summary of Comments | |
| <u>Members of the public and community groups</u> | |
| Comments that objected to development in Steyning included: | |
| <ul style="list-style-type: none"> - Development should be focussed elsewhere in larger settlements to preserve the National Park - Infrastructure is unable to cope with additional development | |
| Comments that made particular reference to site SA742 included: | |
| <ul style="list-style-type: none"> - The impact caused by the proposed roundabout for access on A283 would lead to the congestion and access from Kings Barn Lane is unviable, too small and dangerous. | |

- The site would damage biodiversity and impact on bats, birds and badgers merit consideration.
- Development would impact upon the rural character of Steyning
- The site regularly floods and though not in Flood Zone 2 or 3 is at risk of groundwater flooding
- The site would be distant from services and public transport

Another comment expressed that Bayard's Field would be a better place for development, for the following reasons:

- Good access to services and good road access generally
- The LGS designation on the site is unlawful and this has been made clear to the Parish Council
- The site does not have any special attributes to distinguish it from other sites

The Steyning Society, while generally supportive of the Council identifying constraints with development in Steyning and Bramber, identified that any development in or around SA742 would be at high risk of flooding and the allocation should be deleted.

Parish Council

Henfield Parish Council identified disparity in their figure compared to Steyning, given that they have similar populations.

Site promoters

The site promoter for Land at Clay's Field, Bramber (SA758) identified that there site would be suitable for an additional allocation, stating:

- The Site Assessment Report makes no reference to the fact that only 20-25% of the site would be developed
- The site is sustainable and has access to services
- The site can be designed sensitively to mitigate heritage impact and would involve delivery of open space for the public to benefit from
- The site is not subject to any designations
- The LGS proposed by the Neighbourhood Plan would not accord with national policy requirements
- Minimal allocations have been made and none in Bramber
- The Parish Council is not identifying residential sites in the Neighbourhood Plan

Storrington

| Support – Storrington & Sullington | |
|--|---|
| Number of Comments | 3 |
| Summary of Comments | |
| <u>Members of the public and community groups</u> A comment was made that they agreed with the Council that SA497 was not appropriate for development. | |
| <u>Site promoters</u> The site promoter for land south of Northlands Lane (SA732) indicated support for development on the identified site. They express that: <ul style="list-style-type: none"> - 60 dwellings is a realistic figure but there may be scope for greater development. - The site is related to a neighbouring allocation | |

- Willing to work with development of other sites, so that the whole area is comprehensively planned.
- The site is in a sustainable location, close to local facilities and they would be happy to contribute to improvements to cycle and pedestrian networks.
- The site would not create coalescence with neighbouring settlements.

The same site promoter also identified that SA361 should not be allocated without their site coming forward and that the indicative requirement for the area is very low given the position in the settlement hierarchy.

The site promoter for land north of Melton Drive (SA361) supported the identification of its site and expressed:

- That development had already been allocated in the green gap
- Would recreate lost features and respect the historic landscape pattern.
- Is close to the urban boundary and close to services and facilities – it is a sustainable location.
- The proposed quantum of development is less than applications on site that were rejected.
- Consideration of listed buildings has been undertaken.
- Measures mitigating air quality impacts can be introduced and were accepted at previous planning applications.
- The site would be a logical extension, alongside SA732.

The same promoter identified that that 100 homes in Storrington would be below that needed as this does not even meet the need for affordable housing, let alone the need for market housing. They concluded that the target should be raised to between 180 and 200 and that there is capacity for this. They also identified that it was not clear why their access to school rating was different to SA732. Further they identify that loss of quality agricultural land was not a significant issue in relation to previous applications but would be checked in due course to understand the soil.

The site promoter for Land off Fryern Road (SA639) supported the identification of their site and that it was capable of accommodating 160 homes. In particular, they noted:

- The site would not lead to coalescence with West Chiltington
- The site is not constrained by issues such as biodiversity, landscape, minerals, flooding, etc. and can meet policy requirements.
- A lot of work and studies have been prepared in relation to recent planning applications on the site.

Observation – Storrington & Sullington

Number of Comments

4

Summary of Comments

Site promoters

The site promoter for Angell Sandpit, Water Lane (a site allocated in the Neighbourhood Plan) wanted clarity on their site, stating that it should be referenced within the Local Plan and that the Proposals Map should be clear that Policy 2iii is a Neighbourhood Plan policy, with appropriate shading.

The site promoters for Land West of Ravenscroft and East of Greyfriars Lane (a site allocated in the Neighbourhood Plan) believed that it had the potential to deliver at least double that allocated.

Statutory Consultee

Natural England noted that sites SA361, SA639 and SA732 should consider impacts of surface water discharges on Hurston Warren SSSI.

| Objection – Storrington & Sullington | |
|---|-----------|
| Number of Comments | 75 |
| Summary of Comments | |
| <u>Members of the public and community groups</u> | |
| <p>The following reasons for objections were submitted on the general principle of development:</p> <ul style="list-style-type: none"> - The area has seen a lot of recent development and/or more than its fair share of development was accepted in the Neighbourhood Plan and/or the sites chosen were rejected in the Neighbourhood Plan - Village infrastructure is insufficient (shops, schools, GPs, parking, etc.) - There is a lack of employment opportunities - Development will impact upon the green gap with West Chiltington - Development would impact upon the area's character and on the SDNP - Roads are congested and air quality is poor and an AQMA declared - this will worsen with additional development and the cumulative impact of development (both within Storrington and the surrounding area) merits consideration - House values will reduce - Would lead to a loss of greenfield land and impact wildlife - Densities of new development are/would be higher than existing - Development of the sites would be the beginning of the end of the gap between Storrington and West Chiltington - The sites are not walkable (distance and safety) from services, child safety when walking to school would be impacted. - Development would contradict a number of other plan policies - Low density development would not deliver housing that is in need - Loss of 'Green Belt' land - Allocation of the identified sites would conflict with policies and objectives in the Plan. - The village would be disrupted by construction activities and traffic. <p>The following reasons for objections were submitted on SA361:</p> <ul style="list-style-type: none"> - There is a dangerous junction between Melton Drive and Fryern Road and development would increase danger - Impact on Grade II* Listed Building - Local services are not close by <p>The following reasons for objections were submitted on SA639:</p> <ul style="list-style-type: none"> - There is poor drainage and development would cause further run off, causing additional flooding. - There is a dangerous junction/access in unsafe between Melton Drive and Fryern Road and development would increase danger - Planning permission has been refused already <p>The following reasons for objections were submitted on SA732:</p> <ul style="list-style-type: none"> - Planning permission has been refused already - Impact on Grade II* Listed Building - Regularly floods - Would impact badgers, dormice and bats | |

- Local services are not close by

Parish Councils

Storrington Parish Council made the following comments:

- Most of proposed development no near established employment and/or transport links thereby putting pressure on roads, and infrastructure.
- Some houses aren't selling, so why would new ones be built?
- Numbers make a mockery of Neighbourhood Plans – development should be refused if not allocated in them.
- The three identified sites (below) are outside of the BUAB, have limited access to travel by sustainable means and would result in additional traffic. Traffic would impact air quality in an area where there is already an AQMA and it is not clear what mitigation is proposed.
- Development in Storrington would conflict with Policies in the Local Plan, including 25, 28, 29, 35 and those which relate to infrastructure.
- The cumulative impact of proposed development in Storrington and other localities have not been considered/would impact greatly on infrastructure. Part of CIL/S106 monies acquired from new development in nearby areas should help to fund services in Storrington that those new residents would rely upon.

In relation to Land of Fryern Road (SA639), they stated that:

- Rejected for numerous reasons in Neighbourhood Plan – visible from SDNPA, impact on rural nature, reduces gap between Storrington and WC Common, alter pattern of development, lack of safe pedestrian access, air quality, sustainability.
- The site is allocated as part of a protected gap between settlements.
- The site has had two rejected planning applications with objections also by WSCC Highways

In relation to Land north of Melton Drive (SA361), they stated that:

- Rejected for numerous reasons in Neighbourhood Plan – impact on rural nature, proximity and impact to Grade II* building, increase in traffic, sustainability.
- The site is allocated as part of a protected gap between settlements.
- The site has had two rejected planning applications.
- The reasons for refusal, since the last application was dismissed at appeal, have not changed.

In relation to Land at Northlands Lane (SA732), they stated that:

It was not put forward for inclusion in Neighbourhood Plan but should be rejected for numerous reasons including that the site forms part of the protected gap, impact on listed building, there is poor access, impact on wildlife (bats, badgers, dormice) and part of the site is prone to flooding.

Washington Parish Council identified support for Storrington & Sullington PC in objecting to sites in their parish and expressed disappointment in sites being proposed in addition to the shared Neighbourhood Plan.

Site promoters

A site promoter for SA384 (Land North of Rock Road) [Thakeham Parish] expressed that their site should be listed for potential allocation and that it disagreed with some of the site assessment for this land parcel. Views expressed included:

- The assessment is subjective (e.g. unfavourable scoring seems to be based on a mature tree belt and that the site appears poorly related to settlement form -whereas tree coverage is a positive feature)
- Additional smaller sites are needed as large sites take time to progress.
- SA384 is supported by extensive technical work
- Settlement target for Thakeham is too low.
- Site lies adjacent to built up area boundary and new development.
- Ecological survey suggests little in biodiversity and the scheme can enhance this
- It is well connected to services in Storrington.
- New foot and cycle links could be brought forward
- High quality and affordable housing would be provided in an area of need that would blend into landscape.
- Low flood risk.
- Delivery of public open space.

The site promoters for sites SA485 and SA486 (which is now being promoted as a single site of 10.3ha) made the following comments:

- The site is in sole ownership
- Has good access to services and facilities in Storrington and access to sustainable modes of transport
- Development would help address housing need in Storrington and HDC in general.
- Constraints can be overcome.
- Disagree with elements of the Site Assessment Report as landscape impacts can be mitigated according to their own work and an Appeal Inspector found that harm to heritage assets would be less than substantial. Smell from a pig farm may be irrelevant if that site is brought forward but impacts could be mitigated. Unsure as to why the impact on the AQMA is an issue if not identified for other sites.

The same site promoters comment that site SA639 falls in the green gap, separated from the settlement by woodland and in proximity to areas that flood and therefore would not be suitable. For sites SA361 and SA732 they also note the impact on the green gap and impact on Grade II* listed building and TPOs. All of the above sites conflict with Neighbourhood Plan.

The site promoters for Land at Heath Common/Land at Longbury Hill (SA497) [the site is within Washington Parish] made the following points:

- The site was not considered in the Landscape Capacity Study and the site will be landscaped and designed to fit in with the surroundings.
- The site assessment did not consider, fully, the benefits of the scheme – such as a new footway and car club promotion
- Technical information has been prepared in support and includes mitigation to areas of concern (such as transport and air quality)
- The site is not subject to any protected designations, biodiversity could be improved and air quality impact would be negligible.
- The site is vacant and capable of immediate delivery and would provide much-needed homes (including affordable housing)
- It is not clear why housing figures are low for Storrington, when higher figures are identified for other smaller settlements – an assessment of capacity for each settlement should be undertaken and Storrington would have a higher figure
- High house prices mean that more housing is needed as it is not currently balanced.

The site promoter for SA544 (Chantry Industrial Estate and Chantry Quarry) made comments in support of their site being allocated for 100 homes

- The site is sustainably located
- The site would provide commercial premises and provide additional employment land and retain woodland
- Storrington needs to provide additional housing to meet its need
- The site is brownfield and available in the short term
- The proposed allocations would have greater impact on landscape than this site.

Site promoters for Land at Oldfield Cottage commented that their site is available for development and that the built up area boundary of Storrington would lie close to their site should site SA639 come forward. They also expressed a view that the housing requirement should be higher pointing to figures for other settlements that were greater than the additional 100 identified.

The site promoters for Land South of Kithurst Lane (SA021) disagreed with the rejection of their site for consideration, providing opposing views to the conclusions on, particularly the landscape and heritage impacts, identified in the Site Assessment Report. It was the promoter's view that the site should be allowed to come forward as infill development that is sensitively designed to the surroundings, protecting the wider countryside/farmland from development. It was opined that the site was sustainably located.

The site promoters for Land West of Storrington Road (SA469) [in Thakeham Parish but adjacent to Storrington] objected to non-inclusion of their site as a potential allocation. They commented that:

- The site is sustainably located and not constrained by designations
- It could deliver 140 homes with community benefits such as improved connectivity and play space
- The Site Assessment Report is incorrect in stating that there would be a landscape impact if development were to occur and impact to a listed building could be mitigated through design.
- The site is immediately available and development is achievable.

The site promoters for Land at Ravenscroft Allotments (SA748) wanted to promote their site for housing and were unclear of what the proposals map for Storrington was showing.

Thakeham

| | |
|---|----------|
| Support – Thakeham | |
| Number of Comments | 3 |
| Summary of Comments | |
| <p><u>Site promoters</u></p> <p>The site promoter for SA513 (Land south of Furze Common Road) submitted further information in support of the identified potential allocation. They identified that:</p> <ul style="list-style-type: none"> - The site is a logical extension to Thakeham - It would not compromise the strategic gap - Satisfactory access could be provided - Habitats can be retained <p>The same promoter felt that housing targets for sites should be minimums as 30 homes of different tenures and sizes can be provided on this site.</p> | |

The site promoter for SA039 (Land North of High Bar Lane) supported the identification of their site as a potential allocation but felt that the site assessment had undervalued the site. They identified that:

- The site is in single ownership
- It has good local facilities and opportunities for biodiversity net gain.
- The site should be allocated for up to 30 units.
- A detailed transport assessment has concluded that access is appropriate

Observation – Thakeham

Number of Comments

1

Summary of Comments

Site promoters

A site promoter submitted a site, known as the Orchard, Storrington Road, for consideration through the Site Assessment Report.

Object – Thakeham

Number of Comments

60

Summary of Comments

Members of the Public and community groups

Comments received expressed the following in relation to the principle of development/the potential housing requirement in Thakeham:

- Infrastructure is poor and unable to cope; residents would be reliant on infrastructure elsewhere which is also struggling
- Little public transport
- Thakeham is currently a small village and proposed to be a medium village. Site assessments should not have classified Thakeham as a medium village as that is not its agreed settlement type – Thakeham should remain classified as a small village.
- There are no local shops
- More traffic would increase poor air quality and increase danger – highlighted by the recent fatality in the village.
- Development should not exceed that set out in the Neighbourhood Plan
- Thakeham has already seen a large amount of new development
- Development would impact on the rural character of the settlement
- Construction would cause disruption and impact on safe outdoor play for children
- New development has not been selling – the demand is not there.
- Development should occur on larger, less controversial sites elsewhere.
- New development would not be affordable.
- Continuous growth will lead to merging with other settlements.
- Development will bring in residents who are not local.

Comments that related to SA513 stated:

- The paragraph about site access is repeated.
- Access would require land on either side of existing track to allow for safe vehicular and foot passage and this may not be possible (TPOs/drainage ditches/ownership)
- Access would be dangerous as it would be close to a blind spot where people speed
- Development would result in the loss of agricultural land (Grade 2) and is an SSSI.

- Development would affect the privacy and views of neighbouring properties.
- Wildlife would be impacted (e.g. birds and deer)
- The site is outside of the settlement boundary
- Development would be contrary to the Neighbourhood Plan
- The site benefits from mineral protection rights

Comments that related to SA039 stated:

- The site has been rejected in the Neighbourhood Plan
- Traffic is high and roads are poor
- Eats into the green gap between Thakeham and West Chiltington
- Would result in the loss of agricultural land (Grade 2)
- Access is poor
- Existing residents would lose privacy

Parish Councils

Thakeham Parish Council (TPC) submitted an objection to changing the settlement's status in the settlement hierarchy – due to reasons including population size, lack of public transport and lack of shopping facilities.

TPC further objected to any additional housing numbers in central Thakeham. Reasons included:

- Impact upon the community, including impact on infrastructure and facilities in Thakeham and surrounding communities.
- Lack of engagement with TPC.
- Disproportionate level of housing proposed – increasing above that set out in Neighbourhood Plan.
- 'Creep' of the Neighbourhood Plan sites providing more development than envisaged.
- Public transport is poor and the site assessments are incorrect at the level of service provision. Not useful for commuters or high level education.
- No assessment of impact on Thakeham Primary School.

TPC agreed with not currently developable assessment of numerous sites. In reference to general development of smaller sites, TPC identified:

- that cumulative development of small sites will need to be considered, given need to actively reduce carbon emissions.
- 50 dwellings is an arbitrary number and provides no certainty of delivery. Small sites cannot remedy existing infrastructure issues and these need to be addressed.

In relation to the specific potential allocations, TPC had assessed both sites and expressed the following:

SA039

- Grade 2 agricultural land that only shares a short boundary with the built up area boundary.
- Projects into green gap, a move towards coalescence.
- Would have a larger landscape impact than indicated.
- In an Impact Risk Zone for an SSSI and could have impacts on geo/biodiversity

SA513

- Performs slightly better than SA039 as it infills existing indentation in BUAB and not causing coalescence.
- Grade 2 agricultural land

- In an Impact Risk Zone for an SSSI and could have impacts on geo/biodiversity
- Access constrained in width by draining ditch/tree lined TPOs – an alternative access has not been promoted.
- Though close to a bus stop the service is poor

Site Promoters

A site promoter for a site accessed of High Bar Lane submitted that an additional site should be allocated in the Local Plan. They explained that:

- The site is under new ownership
- The site could provide community benefits (bridleway, additional facilities and parking)
- Was appraised higher in the Neighbourhood Plan than another site on High Bar Lane.
- It is a standalone parcel of land – not part of the Chesswood site

Upper Beeding

| Support – Upper Beeding | |
|---|---|
| Number of Comments | 2 |
| Summary of Comments | |
| <u>Site Promoter</u> The site promoter for Land East of Pound Lane (SA483), while supporting allocation of the identified site, identified that additional capacity (23 homes rather than 15 homes) could be achieved on the site without any harmful impacts. The site promoter for Land at Smugglers Lane (SA055) were supportive of the site being identified. | |

| Observation – Upper Beeding | |
|---|---|
| Number of Comments | 1 |
| Summary of Comments | |
| <u>Statutory Consultees</u> The SDNPA expressed concerns over landscape impact to the National Park in relation to development at Upper Beeding and would welcome further discussions and the provision of further evidence. | |

| Object – Upper Beeding | |
|--|---|
| Number of Comments | 5 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> Comments received related to the following: <ul style="list-style-type: none"> - Building at Upper Beeding will increase flood risk. - Development on Pound Lane is unsuitable due to poor roads, drainage, sewage infrastructure and risk of flooding. - There is no infrastructure to cope with the identified sites for Upper Beeding | |
| <u>Site Promoters</u> Site promoter for SA629 supported the identification of their site in the Local Plan expressing that: <ul style="list-style-type: none"> - The site could deliver 60 homes at a density of 15dph. - It 'scores' the same as the identified sites for Upper Beeding. | |

- It is in single land ownership.
- The site constraints can be overcome.

Warnham

| Observation – Warnham | |
|--|---|
| Number of Comments | 2 |
| Summary of Comments <u>Members of the Public and community groups</u> A member of the public was unclear as to whether the assessed site 'Land north of Bell Road' was the same site as that referred to in the Warnham Neighbourhood Plan as 'Land north Freeman Road'. If not, the member of the public felt that the proposal was too much for the village. <u>Statutory Consultees</u> Surrey County Council identified that some smaller sites (including those at Warnham) are close to main roads that feed into Surrey and have concerns about transport impacts on Surrey from development in Horsham. | |

| Objection – Warnham | |
|--|----|
| Number of Comments | 10 |
| Summary of Comments <u>Members of the Public and community groups</u> <ul style="list-style-type: none"> - Further development above the totals in the Neighbourhood Plan is not proportionate, justified or reasonable and is undemocratic. - Additional development above that in the Neighbourhood Plan should be in the period from 2031 and should be limited. - Some of the sites have been disregarded as part of the Neighbourhood Plan process and should not have been identified in the Local Plan (e.g. Land north and south of Bell Road). - Development of smaller sites at Warnham would be unsustainable. <u>Parish Council</u> Warnham Parish Council submitted the following comments in relation to small site development in Warnham: <ul style="list-style-type: none"> - It is disappointing that a review of its Neighbourhood Plan is needed as it was adopted 8 months ago (at the time of writing). - 50 additional homes is too much but 20 units for the extra five years of the Plan could be sustained – this has already occurred. - SA070 – the Neighbourhood Plan was assessed as unsuitable for development and did not have public support. Development on the site was refused at appeal. - SA071 – is suitable for development but the site was not taken forward. Development of the site did have public support. - Additional housing in Warnham could be (or has already been) met by windfall development. - Development targets could be met by strategic sites without disrupting Neighbourhood Plans. <u>Site Promoters</u> The site promoter form SA563 identified that the site was suitable, available and achievable for development as it could be within the built up area boundary of Kingsfold should Land at Kingsfold | |

(SA459) be allocated. A decision about the suitability of their site therefore should wait until a decision on the strategic site allocation had been made.

West Chiltonington

| | |
|--|----------|
| Support – West Chiltonington | |
| Number of Comments | 5 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <ul style="list-style-type: none"> - The target is appropriate and should be met through windfall development and the Neighbourhood Plan process - SA429 is supported as it is a more sustainable site for allocation in West Chiltonington than SA066 and would cause less disruption. | |
| <u>Site Promoter</u> | |
| <p>The site promoter for site SA500 (Land at Hatches House, East Street) identified general support for the housing target for West Chiltonington and was supportive of the identification of SA429 and SA066. However, they believed that as SA500 was able to accommodate 5 or more homes, then it should have also been identified as being a potential allocation.</p> <p>WSCC as landowner for the Hatches Estate (SA066) supported the identification of their site for 15 homes.</p> <p>The site promoter for SA429, whilst pleased with the recognition of suitability of the land as a potential site allocation and agree with the positives noted in the site assessment, wished to clarify the following:</p> <ul style="list-style-type: none"> - Only a limited amount of vegetation would need to be cleared for access and this was not raised as a concern at a previous planning application. - Ecological work has been undertaken and does not raise any concern. - Biodiversity net gain and SuDS can be provided on site. | |

| | |
|---|----------|
| Observation – West Chiltonington | |
| Number of Comments | 1 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>A member of the public identified the following:</p> <ul style="list-style-type: none"> - That the site area for SA429 was incorrect and likely to be double the identified 1.3ha - Information in the Site Assessment Report had been repeated and was not clear. | |

| | |
|--|-----------|
| Object – West Chiltonington | |
| Number of Comments | 35 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>Comments on sites or the principle of development were varied and covered the following issues:</p> <p>Comments on SA429</p> | |

- The drainage in the area is poor and development would exacerbate the problem, particular with more extreme weather events likely in a changing climate
- The topography of the land means that development on it would cause flooding to the road.
- The site has been dismissed at two appeals and it is not clear why development of this site is now acceptable.
- Development would detract from the views of existing properties
- Development would impact on landscape character and character of village
- Would lead to coalescence with West Chiltington Village and Common/the site is located within a strategic gap.
- Would increase traffic issues in and around the site
- Would lead to environmental degradation.
- Development would be inconsistent with numerous draft plan policies (particularly those relating to the environment).
- The ratings in the site assessment are overly positive.
- Large houses on the site would not meet a local need.
- Development would not provide affordable housing.
- Most journeys would be made by car as bus stop is not close by and has limited service.
- Would cause harm to badgers and their setts, as well as other wildlife.
- Site has been rejected by the Neighbourhood Plan.

Comments on SA066

- Development of the site would impact on the rural nature and wildlife of the area
- The access is poor and would be limited at school pick-off times.
- It will impact on the habitat of Tawny Owls.
- Nearby vineyards use pesticides which could present health and safety issues and noise from the operation of vineyards could impact residential amenity.
- Disruption to residents would occur due to development.

Comments on principle of development at West Chiltington

- There are already houses for sale in the area, as well as affordable housing.
- There is no need for the amount of housing proposed.
- Development would further impact on infrastructure, narrow lanes and drainage/better infrastructure is needed to accommodate development.
- Development would lead to loss of open space and have a negative impact on the health and wellbeing of residents.
- If the Adversane site were to be allocated (located within West Chiltington parish) then West Chiltington should not have to accommodate development.
- A Neighbourhood Plan is well advanced and will allocate suitable sites.
- Development would put pressure on services in Storrington.
- Brownfield land such as the Garage site should be developed instead of greenfield land.

Sustainability of West Chiltington

- Public transport information is incorrect – there is only limited service to Horsham and Storrington and no service to Pulborough
- Difficulty in registering with GPs and schools and accessing higher order services
- There is little employment in the village and people will have to travel to work.

Parish Council

West Chiltington Parish Council (WCPC) made the following points on the identified sites for West Chiltington:

- The area identified for SA066 is 4 hectares but this is incorrect and is actually 0.845 hectares – therefore any other conclusions made by HDC may be incorrect.
- Site SA429 is outside of the built up area boundary and forms the strategic gap between the two areas of West Chiltington – the site has also been twice rejected by appeal.

WCPC explained that in their view allocations for development under 50 units should be left to Neighbourhood Plans and doing so would contradict statements made in other parts of the plan. They also explained that earlier engagement on the proposals of the plan should have been with them given the advanced nature of their Neighbourhood Plan.

Other Settlements

| Other Settlements - Object | |
|---|---|
| Number of Comments | 4 |
| Summary of Comments <u>Site Promoter</u> <p>The allocation of land to the west of Tower Hill/Two Mile Ash (at the end of Salisbury Road between Butlers Cottage and Stone Cottage), Horsham as infill for 4 dwellings. Objection to the removal of secondary settlement status for Tower Hill.</p> <p>Objection to Land at Little Clovers Farm (SA057), Faygate not been included as an allocation in the emerging Local Plan Review. Thakeham Homes – Horsham is least constrained and should adopt the higher quantum of housing options put forward by the Reg 18 plan in order to meet the needs of adjacent authorities (DtC). Faygate should be considered as a sustainable location for growth and Land at Little Clovers Farm should be considered as deliverable, achievable and suitable for an allocation (120 units).</p> <p>The site promoter for SA789 (Land at Shelley Plain) commented that although their site is not considered as a potential allocation in this Local Plan, that the Council should recognise that it could deliver significant amounts of housing, helping to meet future housing land supply and should consider the site during the next plan period.</p> <p>The promoter for SA008 (Land at Barns Green Road), set out reasons why their site should be allocated.</p> | |

Strategic Sites

Land at Adversane (Kingswood)

| Support - Adversane | |
|--|----|
| Number of Comments | 39 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>There was some support for the allocation of Land at Adversane. Reasons for this view included:</p> <ul style="list-style-type: none"> - The site benefitted from good transport links; - A new settlement would be preferable to expansion/additions to existing towns and villages; - The site is preferable to other options being considered. <p>Some that commented gave qualified support for the site that was dependent on the delivery of a railway station.</p> <p><u>Parish Councils</u></p> <p>Henfield Parish Council supported the allocation of Adversane and made reference to existing transport links.</p> <p><u>Site Promoter</u></p> <p>The site promoter made detailed representations on the plan which supported the site's identification. This included explaining how requirements contained in draft policies would be met and that they had engaged with key stakeholders in ensuring that key facilities and infrastructure would be provided to meet requirements. They set out their vision of how their proposals would amount to more than just house building and would be based upon central principals to create a quality place.</p> | |

| Observation - Adversane | |
|---|----|
| Number of Comments | 29 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>A number of comments were received, which included:</p> <ul style="list-style-type: none"> - The site should be considered in the context of other development in and/or around Billingshurst - Development of a railway station and other transport links (bus, cycle and foot) should be provided at the start of development - Development of a nearby employment site had been approved. - The site is not within the Gatwick Diamond. - It was not clear what infrastructure would be provided on the site. <p><u>Parish Councils</u></p> <p>Bramber Parish Council felt that a 'yellow' rating would appear overly generous given the proposed number of houses and no associated main road infrastructure enhancements (or railway extension in this period).</p> | |

Statutory Consultees

Network Rail expressed supports the requirement for a new bridge over the railway removing the need to traverse the level crossing, enabling its closure. They further explained that any proposal for development should include a thorough assessment of the safety impacts of the proposal on the two footpath level crossings to the south of the development called “Rats Bottom” and “Double”.

Southern Water stated that “Our assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Proposals for 4000 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers. Our assessment has also revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Furthermore, the capacity of the local sewerage treatment works would also need to be considered in the master planning of this site and may require phasing of development. Funding for the work would be through Southern Water's 5 yearly business planning process rather than developer funded and as such it would take time to investigate and implement potential options for the provision of new or increased capacity.”

Highways England commented that although remote from the Strategic Road Network it is highly likely that additional impacts will be experience on the Strategic Road Network.

West Sussex County Council noted that in the Site suitability summary – 2nd paragraph – last sentence, Reference was made to the impact on archaeology (Roman road). They suggested that additional text is added to refer to an Archaeological Notification Area which would be affected, and that within the land there are known prehistoric flint-working sites and Tudor glass-working sites. Reference to Mineral Consulting Areas should be removed from the text for Land at Adversane.

The Environment Agency noted the presence of culverted stretches of watercourses and recommended that any policy of the site recognises the opportunities for opening up culverts. They also noted, though there is low flood risk, there does need to be consideration of impact on the wider area and request a comprehensive SuDS strategy.

Natural England raised concern with the site in relation to potential impact to the setting of the SDNPA. They also noted:

- that consideration of impacts from surface water and waste water on the Upper Arun SSI was needed, together with mitigation.
- development of the site could impact land linked to the Mens SAC and that any allocation should be linked to the Sussex Bat SAC protocol.
- the site contributes to views out of the SDNP, the setting of which should be protected. Landscape and Visual Impact Assessment (LVIA) should be required for any development proposal(s) at this site.
- the site contains ancient woodland and policy should safeguard this resource.

| | |
|----------------------------|------------|
| Object - Adversane | |
| Number of Comments | 356 |
| Summary of Comments | |

Members of the Public and Community Groups

There were large numbers of comments received that objected to the allocation of the site. A number of comments duplicated or referred to the responses of Billingshurst Parish Council (see below) and/or that submitted by the BigSTAND Group. A number referred to a petition against the proposal.

Comments often covered multiple issues, which included:

- Queries whether the developer/site promoter were capable of delivering such a large project.
- There is insufficient existing local infrastructure capacity (such as in relation to the transport network, education and health facilities, emergency services, water and sewage, parking, etc.) and there is no guarantee that a new railway station or road railway bridge would be built or that public transport would be provided. Doubts were also expressed over delivery of other infrastructure types by the developers, such as recreation and community facilities and whether infrastructure bodies would commit to delivering items such as libraries or health centres.
- Development would result in the destruction of the natural environment and wildlife habitats, particularly for Barbastelle Bats. Most doubted that 10% biodiversity net gain could ever be achieved. Detrimental effects on Adversane conservation area and archaeology, the rural landscape, the South Downs Dark Skies Reserve, noise, light and air pollution and land for farming/food production were also mentioned.
- Development would not conform with climate change aims and legislation.
- Increased rainfall and development would increase the risk of surface water flooding.
- High density development sought would deliver poor sized dwellings and a lack of personal space.
- The site was not located within nor would it contribute to the Gatwick Diamond and many people would still seek to commute to other employment centres such as London.
- There was limited local employment and the development would not provide enough jobs to meet the needs of new residents. Other comments suggested that the level of employment sought was far in excess of the local demand.
- There is no demand for a Country Club/Hotel and new retail would have a detrimental impact on the trade of other nearby centres. Some commented that a retail impact assessment had not been undertaken.
- Brinsbury Agricultural College is not a secondary School and the number of prospective new residents taking up places or employment there will be negligible.
- Adversane and Billingshurst would lose their sense of identity as rural communities. High house prices on the development will produce a lack of social cohesion and there is no provision for the elderly.
- The site does not provide Gypsy and Traveller accommodation.
- Other sites are preferable/sites with and immediately adjacent to existing settlements are preferable to new settlements.
- Development on a greenfield site would be in contradiction to the Council's Corporate Plan.
- The village of Adversane is not performing as a secondary settlement and an extension of such a site is not justified.
- It is unrealistic to expect the development to act as a self-sustaining settlement and would increase rural trips from people travelling to and from the site.

Parish Councils

A number of Parish Councils outlined their objection to allocation of the site.

Billingshurst Parish Council stated:

- The level of development proposed in Billingshurst alone or in combination with allocation of this site would not comply with Strategic Policy 3 and that Billingshurst has limited infrastructure capacity, which demands from Adversane would exacerbate.
- Adversane may not reach a critical mass to require and it could draw trade away from Billingshurst.
- The findings in the Sustainability Appraisal were less favourable than for sites at Rookwood and West of Ifield.
- The proposed settlement would generate significant traffic on existing roads, including to the railway station and there is no confirmation that a new train station can be delivered.
- The Landscape Capacity Study found that there was a no/low capacity to accommodate large and medium scale development while development would impact on the Conservation Area and interrupt the green gap between Billingshurst and Pulborough – contrary to Policy 29.
- There would be an impact on biodiversity on the site and in adjoining areas.
- DEFRA data indicates much of the site is at risk of surface water flooding and development would prevent land acting as a natural soakaway.

West Chiltington Parish Council made the following points:

- This site is now identified and included by HDC in the Local Plan as Adversane 'Kingswood' without the early engagement requested by West Chiltington Parish Council. Horsham District Council therefore have failed to meet the requirements of national planning policy.
- The assessment process is flawed and demonstrably contradictory to the criteria used and the NPPF as a whole. The traffic light system particularly relating to Adversane has resulted in a perverse assessment and actually contradicts the criteria as identified in Appendix 1 of the Regulation 18 Site Assessment Report. Thereby the site is contrary to NPPF Chapter 15. Horsham District Council have failed to provide sufficient evidence in support of their Site Assessments and are thereby denying true scrutiny of the strategic site of Adversane.
- No evidence has been provided for the developer's assertion at Adversane that there will be one job per household. Economic growth and social and environmental requirements cannot be met with the Adversane site.
- They believe that they have not been consulted properly in accordance with Regulation 18 due to lack of evidence and information.

Thakeham Parish Council expressed that:

- Over-development would cause significant change to the rural character of the area.
- The traffic impact would be severe and significant trips would be made through Thakeham towards the A24 – which is not recognised in the proposal. Their experience suggests that any general highways funding the development may yield will not be adequate or prioritised to address the local impact.
- If any significant development occurs at this location the opportunity must be taken to create a new rail station.

Pulborough Parish Council stated that:

- Development would impact upon the Pulborough Community
- Southbound traffic would pass through Pulborough, increasing pressure on the road network.

- Development would potentially increase the pressure on shops, health services and railway station.
- The claim of jobs creation in Adversane matching the number of dwellings must be clarified.
- A new sewerage treatment plant would have to be constructed before dwellings were constructed.
- There is no apparent consideration for installation of education, health and utilities necessities before houses are built.

Shipley Parish Council stated that Adversane was not consistent with Chapter 3 relating to sustainable development and that it does not support developments anywhere where there is limited infrastructure that will itself need major development. In their view, development should be accommodated and allocated to existing settlements and the proposed new settlement allocations removed.

Nuthurst Parish Council commented that strategic sites should not be located in unsustainable locations in the middle of open countryside where there are no employment opportunities, inadequate infrastructure and would require residents to use their cars to travel for work and to all services and facilities.

Wisborough Green Parish Council viewed the potential allocation as a huge loss of productive greenfield farmland. They also expressed that if this site is to be considered, then a new railway station should be a requirement for development

Other organisations

Campaign to Protect Rural England expressed the following:

- Risk to vitality of existing villages.
- Potential for the coalescence of development between Billingshurst and Pulborough.
- Not certain that new railway station could be delivered.
- Impact on Adversane Conservation Area.
- Uncertain if delivery of infrastructure could keep pace with housing growth.
- Question the assertion of one new job per home.
- Question the deliverability of net biodiversity gains which is not optional.
- Traffic impacts will be of a much greater magnitude than assessed.
- The Site Suitability Ratings', as they appear to be unsubstantiated by evidence.

The Woodland Trust objected to ancient woodland areas being included in sites allocated as suitable for development. Development in their view which would result in the loss of ancient woodland, aged or veteran trees should not be permitted and in particular referenced land at Adversane.

Member of Parliament

Andrew Griffith, MP for Arundel and South Downs regarded all the strategic sites within his constituency as completely inappropriate as development sites and should neither have been included within the current consultation nor be included within the HDC Local Plan. He stated that the following have not been properly considered or addressed within the Consultation Document:

- Impact on flooding both of the sites themselves and more significantly on the broader River Arun and River Adur Catchment areas The National Planning Policy Framework states that strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources.

- Lack of suitable transport facilities. The south of the District has extremely limited access to rail services, roads which are already congested at key junctions at peak times and is poorly served by bus routes. Hassocks and Billingshurst stations, are already over capacity and have insufficient access road capacity.
- Absence of clear plans or enforceable commitment to address existing gaps in community infrastructure
- Proximity to and impact upon the South Downs National Park
- Loss of protected and rare species diversity through destruction of irreplaceable habitat and wildlife 'corridors'.
- the inclusion of these sites within the consultation process has caused unnecessary stress and anguish to my constituents.
- Deep concern was expressed that the deadline for this consultation has not been extended and consider that this represents a fundamental flaw in the requirement that the HDC Local Plan be properly consulted upon. I consider that this exercise should be re-run once the Government has deemed the current pandemic to have concluded and a normal state of affairs to have resumed and in the meantime a moratorium be placed upon any further development beyond that within existing approved plans as at 1st March 2020.
- Whilst there is societal pressure to build more homes – partly due to the past open-door immigration policy which we are now closing – my view is that these homes need to be where the infrastructure already is.
- The Adversane plans have been proposed by a developer with no track record of delivering large-scale sites such as the one they propose.
- Our Place claims it will provide 'one job for every new home'. This area has benefitted from some of the lowest unemployment in the country. So it must be questioned just who will live in the new houses and take the jobs?

Developer/Site Promoters

A number of comments indicated that they viewed the allocation of sites that they were promoting were more sustainable than the proposal on this site.

Land East of Billingshurst (Little Daux)

| Support – Land East of Billingshurst | |
|--|-----------|
| Number of Comments | 33 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>A number of individuals submitted comments in support of this potential allocation. The view was expressed by multiple representors that that of the three locations proposed in the area, East of Billingshurst would be the more preferable option for sustainable development. Additional comments included:</p> <ul style="list-style-type: none"> - Development sites should be located in the north of the District. - Sites that abut existing development should be prioritised as they have the potential to easily connect with existing infrastructure, services and amenities. - Priority should be given to sites located in places with an existing railway station, or straddling a railway line where a new station could be built. The site has the advantage of an existing railway station, good road links and public transport options. - Offers the opportunity to deliver sustainable expansion to the settlement, building on the infrastructure which is already in place such as the already introduced improvements to | |

A272. Scale of development is sufficient to address any deficiencies in community facilities.

- Avoids creating an isolated new settlement away from existing facilities where timescales for delivery and infrastructure provision are uncertain.
- Like that Billingshurst continues to build out so it can become a town of its own right. Residents have already bought into a growing town strategy unlike other land sites where residents have not purchased homes with this mindset.
- Billingshurst is more efficiently suited to urban growth as it provides capacity to expand and still maintain a balance of green space, housing and serviceable facilities.
- Site would be more in keeping with the current rural settlement pattern and preserve the green space surrounding Billingshurst. It is within walking distance of key village facilities and support the development and enhancement of the high street and other employment in the local area.
- Aligns with existing policy to expand East of Billingshurst which has demonstrated the demand for housing in this location. Proximity to existing employment sites in and around the settlement is highlighted as important to provide the opportunities to live and work locally.
- Well related to Hilland Farm which will be important in providing modern, high-quality employment space which can be provided in a timely fashion and complement the committed and planned housing growth in Billingshurst.
- Provision of additional or enhanced services within the town becomes more viable and residents can access those services using sustainable local transport methods.
- Would not require new waste treatment plant or the pumping of effluent over large distances for treatment as could use existing facility south of Billingshurst.
- The allocation will deliver a large amount of new housing over the plan period.

Site Promoter

The Site promoters supported the allocation stating that the proposal would have prompt delivery of homes from 2022/23 and deliver a number of community and green infrastructure benefits, notably a new primary school for the village. They explained that the potential allocation would generate an additional population which will assist with sustaining the existing retail and amenities of the village high street.

In respect of the evidence base the site Promoters request that fairer weighting be given in the RAG assessment of the nine potential Strategic Allocations, with scoring to best reflect the Proposal at Little Daux; they would like further consideration be applied to the inferior landscape, and sustainability credentials of West of Billingshurst and Adversane in comparison to Little Daux, that the SA and Infrastructure Delivery Plan in particular, be updated to reflect the benefits of a Strategic Allocation of Little Daux; and that further evidence be produced to support the draft Local Plan, notably on viability and transport.

Observations – East of Billingshurst

Number of Comments

25

Summary of Comments

Members of the Public and community groups

General observations in relation to the site included:

- many of the existing commercial /industrial units in Billingshurst are older and possibly not adaptable to modern working practices and that little can be done in the way of widening domestic roads.
- It was noted that the existing bus service is expensive and limited (no service on Sundays or evening) – it is also full by the time it reaches Jengers Mead on the way to Horsham.
- School places are limited
- Billingshurst has no large supermarket within walking distance of the whole village from Marringdean Acres and Kingslea Farm with residents finding it more convenient to travel out of the village to shop (placing more vehicles on the roads).
- Questions over the terminology in the plan stating HDC will '*seek to protect and enhance the diversity of existing retail centres*' when the retail offering is actually shrinking.
- The area suffers from surface water flooding, there are potholes resulting from heavy rain on rural roads and the pavements are continually being dug up for utility servicing.

There were a number of comments stating that the existing developments in and around Billingshurst need time to 'bed in' and also suggestions that the cumulative impacts of the three proposed developments in locations around Billingshurst be considered together.

Rudgwick Preservation Society stated that it felt Billingshurst has had enough development for the time being. There were significant obstacles such as providing secondary education, and other services, facilities and infrastructure are not adequate. That being said, it felt that this proposed location is better than that of Land at Adversane (Kingswood) and Land West of Billingshurst (Newbridge Park).

Parish Council

Horsham Trafalgar Neighbourhood Council noted that urban extension proposals such as at Billingshurst, Southwater and Rookwood (amongst others) run the risk of putting greater pressure on services and facilities where there is already an infrastructure deficit.

Bramber Parish Council noted that piecemeal development could lead to a disjointed development both from a housing and community benefits aspect.

Statutory Consultees

Network Rail welcome the proposed pedestrian and cycle access to the station provided it does not encourage trespass on the railway. Concern is raised over the Daux Footpath level crossing which is on a footpath reliant on trains blowing their horn to warn users of approaching trains. The proposed site allocation would make the increased risk at this crossing too great and so Network Rail would like to work with the Council to seek an amendment. The options include partial closure / diversion of footpath (WSCC 1938-1) through town along Station Road, or crossing replaced with bridge / underpass.

West Sussex County Council would like the following text added to the 2nd Paragraph: 'add after last sentence that an Archaeological Notification Area would be affected, and that the land adjoins a Late Iron Age and Roman settlement and field system, on the south side of the A272'.

Highways England noted that whilst the two sites at Billingshurst, supporting up to 2200 dwellings as urban extensions may not significantly impact the Strategic Road Network individually, they will add to the cumulative impacts of the overall plan.

Southern Water note that the existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. However this limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure.

They further explained that proposals for 1200 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019).

They stated that their assessment also revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required, which may affect the site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.

They recommended that occupation of development be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider and that layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purposes.

Environment Agency advise there is a small area of flood zone on the southern part of the site associated with Par Brook. Opportunities should be taken to ensure that development would not increase flood risk to third parties.

They include general comments on the sites highlighting that a number include river corridors or watercourses with associated flood zones. Whilst they note that these areas will not be built on there is no obvious application of the Sequential Test as required by the NPPF and PPG to consider whether these are the most suitable sites. This may be done as part of the Sustainability Appraisal process but should at least be documented. Where there are main rivers on site access to these will need to be maintained for the Environment, in addition Flood Risk Activity Permits (FRAP) may be required if the development is proposing works within 8m of the watercourse.

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| Object - East of Billingshurst | |
| Number of Comments | 279 |
| Summary of Comments <u>Members of the Public and community groups</u> A number of individuals objected to the potential allocation with the common issues set out below: <ul style="list-style-type: none"> - Lack of adequate infrastructure – there are significant concerns that the Schools, GP Surgeries and Dentists are already at capacity; - Overdevelopment of the village and loss of village character; | |

- Loss of open space and access to the countryside and associated impacts (mental health effects, loss of recreation, etc.)
- Loss of wildlife and habitats;
- Some of the site is located within Flood Zone 2 and 3 and there is a problem with surface water flooding around Par Brook. A lot of respondents submitted photos highlighting the surface water flooding in this area;
- Negative impacts on traffic through the town as the roads are already busy at peak times;
- Concerns about pedestrian safety due to the increase in traffic;
- Impact on ancient woodland;
- There are concerns about the adverse effect on Little Daux Farm Grade II Listed Building;
- Loss of land for food production;
- The recently permitted new development in Billingshurst needs to assimilate with the rest of the village before additional development is planned;
- Concerns about an increase in air, noise and light pollution;
- Concerns about the impact on climate change;
- The area south of the railway line is considered isolated from land to the north in the Site Suitability Assessment and this should be reflected in the SA;
- One resident identified that there may be an area of land contamination near an oak tree as there is an 'oil like substance pouring from the ground when it is wet';
- Concern that no provision has been made for a cemetery even though the proposed allocation is on a site previously discussed for such a use;
- Concern that recent developments have pushed the new population away from the village centre meaning they use their cars to travel to retail areas further afield, meaning the local shops remain empty or small businesses short lived;
- Concern about connection to the existing sewerage network;
- A few residents also raised objections about the proposed access off Broomfield Drive and Birch Drive, stating that they are quiet residential roads.

CPRE Sussex objected to development in this location on the grounds that Billingshurst already experienced a substantial increase in its built area and population, that the site promoter has not committed to providing 'biodiversity net gain' nor focussed measures to minimise the impact of climate change. They expressed concern that the site would generate traffic impacts on the A272 and the proximity to the railway bridge and issues of road safety have been identified as concerns.

Sussex Wildlife Trust made a representation stating that the RAG rating for this site should not be positive simply because the developer has committed to providing biodiversity net gains. SWT are also concerned that the allocation will isolate Wildens Meadow LWS and that there is no commitment to Rosier Wood LWS. They also noted that there are records of protected species on the site.

The Woodland Trust objected to the allocation of sites which include ancient woodland and, in respect of sites adjacent ancient woodland like this one, request a minimum buffer of 50m between development and the ancient woodland (including construction) unless a smaller buffer can be clearly justified. The buffer should be larger for significant engineering operations or after-uses that generate significant disturbance. The intense pressure for development makes the protection of ancient woodland and veteran trees all the more important and the regard to be given to para 175 of the NPPF.

Parish Councils

Billingshurst Parish Council objected to the site on the grounds of landscape, biodiversity, drainage/flooding (particularly around Penny Brook and Cedar Brook which are part of the catchment area of Par Brook which is important for surface water drainage in the area),

community infrastructure (e.g. education, health and leisure), transport in terms of the impact on the A272 and other local roads connecting to the village centre and informal recreation provision.

They also rejected development in this location stating that it was inappropriate given the recent growth of the settlement, local housing need, current local scale housing capacity, the scale and function of the settlement time, the existing infrastructure capacity, and the proposed development not being contained within a defensible boundary.

Pulborough Parish Council objected to any further extension to Billingshurst on the grounds that it would adversely impact the community, the already overstretched road network to the south, shops, railway station and health care facilities.

Statutory Consultees

West Sussex County Council would like to see an amendment to the second paragraph of the site suitability report : ‘add after last sentence that an Archaeological Notification Area would be affected, and that the land adjoins a Late Iron Age and Roman settlement and field system, on the south side of the A272.’

Natural England made general comments about the assessment of strategic sites.

In respect of Land East of Billingshurst (Little Daux) they say a site of this scale is likely to impact views from the SDNP and that development within the setting of the SDNP has the potential to impact the purposes of its designation. Appropriate policies must manage the nature, scale and location of development within and in the setting of the SDNP which should be informed by relevant Management Plan, Character Area assessments and Landscape and Visual Impact Assessments and guidance. Should the site be allocated policy provisions must safeguard the Ancient Woodland from loss or damage in accordance with NE advice. They also advise that consideration must be given to the potential impacts from surface water and waste water on both the Upper Arun SSSI and Pulborough Brooks SSSI, and the scope for mitigation. They further advise that HDC must consider the potential impact on the functionally linked land associated with the Mens SAC and request regard be given to NE’s Sussex Bat SAC protocol and South Downs National Park’s Local Plan.

Site Promoters/Developers

Representations were received from some developers objecting to the allocation. Comments included:

- The level of growth at Billingshurst is too great, considering development that has already been recently delivered and/or approved. As such, a more dispersed approach and provision of housing at other locations would be preferable, reducing the reliance on strategic sites.
- The tree belt separating the proposed allocation from Billingshurst would prevent visual, pedestrian and cycle connections – which is similar to the conclusion raised for the land at Bridgewater Farm to the west of Billingshurst and this should be reflected in a reviewed site assessment.

Another representation suggested that the boundary of the site should expand to further contribute to the delivery of housing.

Land West of Billingshurst (Newbridge Park)

Support - West of Billingshurst

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|--|-----------|
| Number of Comments | 11 |
| Summary of Comments | |
| <p><u>Members of the Public</u></p> <p>Few supportive comments were received, but comments in support included:</p> <ul style="list-style-type: none"> - Good rail, bus and road links within a reasonable distance. - The provision for a country park would benefit the whole community. - Would have less impact on the character of the village and less impact on existing residents than the East of Billingshurst proposal. - Benefits like a primary school are planned. <p><u>Site Promoter</u></p> <p>The site promoter for the site submitted a response supporting the allocation of the site. They identified benefits of the scheme, including:</p> <ul style="list-style-type: none"> - Delivery of up to 1,000 homes including a policy compliant amount of affordable housing. - Provision of a Country Park for new and existing residents to enjoy, along with a community building and a playing field. - Providing a high quality development, that takes into account the climate change requirements, sensitive landscapes, nearby listed buildings and the need to provide a 10% biodiversity net gain. - Provision of a new primary school and contributions towards upgrading secondary schools. - Some employment and retail would be provided but not so much as to undermine the village centre. - There are no plans to develop on land at risk of flooding. - The land is under single ownership and delivery should not be a problem. - Upgraded pedestrian and cycle links to Billingshurst and its services (including railway station) would be provided. - Provision could be made for Gypsies and Travellers. <p>The site promoters also explained that the write-up were inaccurate as the Council had referred to land not within their control in some of the consultation material and confirmed that they were not working with other landowners on a larger site. They also explained that this will impact on the assessment of the site in relation to landscape as it does not include land which is particularly sensitive to visual impacts.</p> <p>Two other site promoters indicated support for the allocation. Support was given in the context that they were promoting adjoining/nearby sites that could either complement the proposed allocation or could be added to the site to deliver a larger development.</p> | |

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|---|-----------|
| Observation - West of Billingshurst | |
| Number of Comments | 26 |
| Summary of Comments | |
| <p><u>Members of the Public and community groups</u></p> <p>The following observations were made:</p> <ul style="list-style-type: none"> - The site may be suitable in the future if a school and Country Park would be delivered. - A number of sites around Billingshurst are proposed and while sites may be individually appropriate, cumulative impacts need to be considered. - Reference to 'potential' benefits is just speculation. | |

Comments were made that should the site be allocated, it should be a requirement to provide certain infrastructure. This included:

- A bridge or underpass across/under the A29 would be needed.
- Pitches should be allocated for Gypsies and Travellers.
- Public transport must be expanded upon to help cater for the increase in over 65s.

Keep Southwater Green commented that the Council has already approved greenfield sites as new 'employment land' which could be seen as having the potential to influence the selection of options for 'strategic' housing development in locations close to some of them.

Parish/ Neighbourhood Councils

Horsham Trafalgar Neighbourhood Council commented that urban extension proposals such as at Billingshurst, run the risk of putting greater pressure on services and facilities where there is already an infrastructure deficit.

Bramber Parish Council expressed concern given the proposed number of houses and no associated main road infrastructure enhancements. Concern about impact on existing community facilities with no proposed mitigation. Concern about connectivity to the existing settlement, given the presence of the A29 which would effectively become an in-town road.

Henfield Parish Council expressed a neutral view on the site, representing neither an objection or a support.

Statutory Consultees

West Sussex County Council suggested that in the site suitability summary – 2nd paragraph: that after the last sentence reference should be made as within or adjoining the land it is the possible site of the medieval new town of Newbridge, and a Bronze Age site (west of the Billingshurst Bypass Roundabout).

Network Rail commented that walking and cycling access should be provided to Billingshurst station and an extension of the station car park should be considered with appropriate funding provision.

Highways England commented that in combination with land east of Billingshurst, the two potential sites of up to 2200 dwellings as urban extensions may not significantly impact the Strategic Road Network individually, but they will add to the cumulative impacts of the overall plan.

Southern Water commented that existing local sewerage to the site has limited capacity. This site will need reinforcement of the wastewater network which will be provided through the New Infrastructure charge to developers. Connection to this site ahead of new infrastructure delivery could lead to an increased risk of flooding. Occupation of development must be phased to align with the delivery of sewerage infrastructure.

Arun District Council stated that options around Billingshurst would offer opportunities for modal shift to rail for longer distance and local commuting and would need to look at reducing the impact on the A29.

Environment Agency advised the northern parcel of this site includes floodplain Flood Zone 2 and 3 of the River Arun. Policy requirements must clearly ensure that these areas are not developed, including a suitable buffer for climate change impacts on this floodplain. There is an extended

culvert on the northern part of the site and they would recommend that any development takes the opportunity to open up the culvert and re-naturalise the river. Development should be through a landscape led scheme and recommend that opportunities for the delivery of natural flood management is explored that could provide increased flood storage in the upper reaches of the River Arun and support reduced flood risk downstream.

Natural England provided general advice as to how raised:

- that consideration of impacts from surface water and waste water on the Upper Arun SSI was needed, together with mitigation.
- development of the site could impact land linked to the Mens SAC and that any allocation should be linked to the Sussex Bat SAC protocol.

Object - West of Billingshurst

Number of Comments

243

Summary of Comments

Members of the Public and Community Groups

Objections were varied and often covered multiple issues. Reasons for objection included:

- Part of the site is a flood plain and there would be a risk of increased surface water and fluvial flooding on local roads;
- There is insufficient local road infrastructure and capacity;
- Development would exacerbate existing transport problems, such as on single lane New Bridge on the A272 which is already gridlocked; Rowner Road is already a rat run in lieu of the A29 bypass; insufficient parking at Billingshurst rail station; insufficient current rail network capacity; insufficient bus capacity;
- It would breach the existing development boundary recognised as the A29 and would create a separate development not properly integrated with Billingshurst;
- Billingshurst has already experience much growth and further growth is unsustainable and disproportionate;
- Development would have a detrimental impact on health and quality of life (noise/air pollution);
- There is insufficient local infrastructure to accommodate new development (education, health, leisure, etc.) and/or proposed infrastructure unlikely to be delivered;
- Proposal does not address climate change issues and there is insufficient green infrastructure proposed;
- Residents would be reliant on cars to access services in Billingshurst rather than use pedestrian links;
- Other sites and locations are preferable;
- The site should be designated as Green Belt;
- Loss of agricultural land/impacts upon farming and rural businesses;
- Impact of additional football on fields and footpaths;
- Impact on local house prices – with sales of existing properties being difficult;
- Insufficient retail and employment;
- Site is not within Gatwick Diamond;
- Houses will be unaffordable;
- Loss of rural character and/or coalescence with surrounding area;
- Increase in pollution, impacting on watercourses and SSSI;
- Loss of recreational spaces;
- Impact on ancient woodland and biodiversity; and
- Impact on listed buildings

Parish Councils

Billingshurst Parish Council objected to strategic growth at Billingshurst viewing that the most the most appropriate strategy would be to focus strategic-scale development at Crawley and Horsham, with local-scale development focused on the 10 small towns/ larger villages. The stated that Billingshurst has the capacity to accommodate local-scale growth during the Local Plan period but further growth would significantly exceed identified local needs, taking into account recent growth, the scale and function of Billingshurst and infrastructure capacity. They explained that development of the site would breach the existing recognisable and defensible boundary of the A29.

Other Parish Councils submitted objections, including on the following issues:

- The site is excessively large;
- The site is disconnected from the village;
- Development would result in the loss of farmland and significant landscape;
- Significant transport infrastructure would be needed/ there would be large transport impacts on existing transport infrastructure such as on Rowner Road;
- Development abuts the River Arun and would increase flood risk, including on the A272;
- Development would increase pressure on surrounding settlements such as Pulborough.

Site Promoters/Developers

A number of representations were received objecting to the proposed allocation in the context of identifying that sites that they were promoting were more suitable and sustainable and should be allocated instead.

Land at Buck Barn (Weald Cross)

Support - Buck Barn

Number of Comments

14

Summary of Comments

Members of the Public and community groups

Comments made in support of the proposed allocation included:

- The site was preferable to other potential sites
- It is a great opportunity to construct a Garden Village
- It would contribute to sustainability of Southwater
- The site is well suited for those employed in Brighton, Crawley or Gatwick
- New settlements such as this one protects smaller communities from unsustainable development
- Provides opportunity to plan for balance of green space, housing and facilities
- It is well connected and in a central location within the district
- Road network is less congested than in other areas
- Provides for both primary and secondary schools, and other infrastructure including doctors and shops
- Affords an opportunity for economic as well as residential development
- Has potential to provide a good proportion of required housing in the south of the district

Site Promoter

The site promoter set out what they consider to be the key benefits arising from the proposed site development. They state that they have genuine commitment to ensuring quality placemaking and

delivering developments that provide infrastructure upfront and that they have evidence of this elsewhere (e.g. Pease Pottage). They would deliver the full policy-compliant affordable housing requirements on-site.

It was explained that the site's masterplan had considered compliance with aspects of the draft Local Plan and that evidence had been produced relating to the proposal, including in respect of:

- Landscape
- Biodiversity
- Archaeological / cultural heritage
- Environmental quality (including air quality)
- Transport and access
- Flooding and drainage
- Climate / renewables / energy efficiency
- Economic impact
- Retail
- Housing types, tenures and brands
- Provision for education
- Provision for health
- Leisure / recreation and community facilities
- Deliverability & viability

The masterplan explained that the site would provide for

- 3,500 residential housing units
- Country Park
- 15,000 m² of employment space (B1/B2/B8 Use Class)
- Three education facilities, including:
 - o Two primary schools (2FE and 3FE) (420 and 630 pupils)
 - o Six-form entry secondary school (900 pupils)
- 3,300m² retail space likely to comprise:
 - 2,500 m² food store (A1 Use class);
 - 800 m² retail units (A1 Use Class)
- 2 pub/restaurants
- A GP surgery with pharmacy (subject to NHS / CCG agreement)
- A community hub with library
- Transport hub
- 3G/4G sports pitches

Observations – Buck Barn

Number of Comments

18

Summary of Comments

Members of the Public and community groups

A number of comments of observation made the same points as made in the 'Objection' category and are therefore not repeated here. Further points were made as follows:

- Less impact than other potential sites
- Much work still needs doing re transport
- No connection to anywhere else
- Many promises made from the developer are not in his gift to deliver (e.g. location of schools, commercial bus services, GP surgery)

- Site assessment is biased towards a conclusion of 'suitable' / inconsistent with Sustainability Appraisal
- A more rigorous and factual assessment is required
- Concern for cycle safety on minor nearby roads
- Request long term planning for Scout groups
- Lack of compatibility between countryside location and the need to provide housing for downsizers and affordable housing

Statutory Consultees

West Sussex County Council requested reference to northern part of the 16th century or earlier West Grinstead Park having formerly occupied the south end of the land.

Network Rail noted that the site is adjacent to the former Christs Hospital to Shoreham railway line. The alignment should be protected for future transport need.

Highways England explained that the site could have a potential direct impact on the Strategic Road Network as well as adding to the cumulative impacts of the overall Plan.

Object – Land at Buck Barn (Wealdcross)

Number of Comments

360

Summary of Comments

Members of the Public and Community Groups

There was a large amount of objections to the proposed allocation. Some referred to or provided links to a petition containing thousands of signatures of objection. The objections were varied and contained views relating to different themes, described below:

Need for development

The overall need for this development was questioned. Comments made described the level of development in nearby towns and villages to be sufficient, and anything further would go beyond meeting local need. It was also questioned why the site had been identified following the conclusion in the SHLAA December 2018 that the site was 'not currently developable'. Some mentioned that development would have unacceptable impacts in combination with the proposal known as Mayfield.

Development strategy

There was criticism that the proposal failed to demonstrate a clear vision. It was suggested that development of this size should be located further south on A24 corridor. A commentator also stated that the site should instead be used to provide an education campus. It was suggested that the developer only deliver 100 homes a year, hence this site would take 35 years to complete. The loss of a rural greenfield site and good quality agricultural land was a particular concern – preference was expressed for brownfield sites or urban extensions. The prospect of a large area of 'urban sprawl' was highlighted together with the longer potential for settlement coalescence with Southwater.

Biodiversity

In addition to a generalised concern that development would adversely impact biodiversity, local wildlife and ecosystems, the impact on the rewildling on the nearby Knepp estate was raised as a specific concern. Cynicism was expressed regarding the ability of the development to deliver a 10%

net gain in biodiversity. Other specific concerns included the loss of ancient woodland, veteran oaks, rare orchids and various other animal and bird species, light pollution on wildlife, and the loss of key protected species including birds and great crested newts. Reference to the the scheme conflicting with Woodland Trust restoration projects in the Low Weald was made. The impact of pets (cats and dogs) from new homes on local wildlife was also raised as a concern. The ability of the site to contribute to biodiversity net gain was also questioned.

Landscape and environment

Road improvements such as a flyover were also felt to be very urbanising – the impact of developing countryside at this location on mental health and wellbeing was considered unacceptable. The topography of the area and the capacity to support development was questioned. Concerns were also raised that development on this site would impact on the South Downs National Park. The impact of light pollution on the rural landscape was also raised as a concern. Some were concerned about a potential increase in cycle commuters on Downs Link (impact on walkers), or the extra development would mean that the amenity of the Downs Link would suffer.

Comments were made regarding the negative and uncertain impacts identified in respect of a number of Sustainability Objectives, with conflicts with HDC's Landscape Capacity Assessment (close to area showing no/low capacity for development). It was noted that the site includes remains of Saxon field boundaries. A likely adverse impact on listed buildings in and near the site was highlighted. Furthermore, underlying clay soil requires high spec footings which has an environmental impact.

Transport

The increase in traffic from housing and associated development in this location was a significant concern, with increased congestion on the surrounding road network a key issue raised. Other concerns included rat running on other roads, difficulties accessing the A272 / A24 from side roads, potential need to widen Bar Lane and properties and the potential for this to generate road safety issues. The need for significant mitigation measures was recognised but the deliverability of a new flyover at Buck Barn was questioned.

Some suggested that particular transport measures would be needed if development were to occur. This included a bypass around Cowfold, a tram route between Horsham and Buck Barn and a Park and Ride Service to reduce congestion.

Infrastructure

The lack of infrastructure to support development was a significant concern. Many felt that should the site be allocated, the developer should build new infrastructure ahead of any houses being built. A lack of faith in developer's experience and ability to deliver on promises was mentioned.

It was noted that schools are already oversubscribed and that new schools would need to be provided should the site come forward. The lack of existing hospitals, GP surgeries and dentists were raised as issues, along with concern that new health care provision would not be provided on site. It was mentioned that Cowfold and Henfield GP surgeries are over capacity and a local GP commented that it is already extremely difficult to recruit staff to a surgery.

Other concerns raised in relation to infrastructure included insufficient sewage capacity – currently at Dragons Green, electricity (no local substation) and the need for more facilities to deal with household waste. Poor local broadband speeds were referred to and some questioned the ongoing viability of leisure and recreation facilities.

Economy and employment

There were clear concerns highlighted, including that it is not clear whether one job per home would be provided, the site is not near to any employment opportunities in the area, and it would inevitably it would become a dormitory commuter town. It was also considered that the development would reduce investment and viability in nearby settlements, and more shops on this site would impact on existing struggling shops in Horsham.

Climate and Environment

It was stated that the site should be kept as countryside to address climate change. The likely impact on air quality would be particularly detrimental to children, whilst prevailing winds together with development may add to pollution levels. Some considered that the development would lead to excessive water consumption. One comment noted that there is an acknowledged seam of building stone that would be adversely impacted by development

Flooding & Climate Change

There were concerns expressed that there would be significant flood risk including from surface water, and noting that tributaries to River Adur flow through the site. Many said that climate change will make flooding inevitable. There was particular concern that there was a risk of pollutants going into the River Adur from the development run-off, including from prescription drugs.

There was also comment that the proposal for electric car charging ignores heavy environmental impact of manufacturing electric car batteries. Also, that the feasibility of electric vehicle charging was questionable due to capacity of overhead distribution lines.

General impacts on residents

A theme running through responses was that there would be an unacceptable change in character from rural to urban, and an adverse impact on rural communities' way of life and the peacefulness of an area of beautiful, tranquil countryside that is highly valued locally. It was also questioned whether housing development is appropriate so near to 440,000 Volt power lines.

Housing

Many respondents considered that the development would do little to genuinely help meet local housing needs, and there needed to be more evidence that the proposal would prioritise housing for local people unable to buy on the open market. It was questioned whether the proposed affordable housing would provide for actual need, and some considered that only larger houses would be built whereas smaller dwellings are needed.

A few respondents objected to the provision of Gypsy and Traveller pitches at this location.

Deliverability & viability

Some considered that the development might not be viable or deliverable given the developer's alleged lack of experience in building out sites of this size. It was suggested that there is an additional landowner not identified by the developer leading to uncertainty of deliverability. Some stated that the expected global economic downturn will mean demand for housing here significantly diminishes.

Parish Council

West Grinstead Parish Council objects strongly to the allocation of the site. It is considered to conflict with HDPF Policy 2 (i.e. conflict with the settlement hierarchy), and is not readily accessible

by public transport (nearest train station is at least 8 miles away). Also conflicts with new Policy 28 – Countryside Protection, being development in the countryside which is not essential to that location. The impact on air quality would be unacceptable (around 7,000 more cars on local roads) with significant number travelling east toward Cowfold, which is already an Air Quality Management Area, resulting in dangerous levels of air pollution in breach of the law. Proposal would also increase road traffic danger due to heightened difficulty in safely using gaps in A24 dual carriageway central reservation when accessing the A24 from side roads.

Shermanbury Parish Council expressed concerns in relation to traffic, air pollution and road safety, in particular identifying that it would exacerbate existing problems at Cowfold.

Nuthurst Parish Council issued a strong objection to the site, highlighting its isolated location, loss of agricultural land, impact on the Low Weald and many other reasons that are common with other consultees. They were of the view that many of the promises made on infrastructure were outside of the ability of the developer to provide and an analysis of the site assessment was provided highlighting why they disagreed with the Council's assessment and that the assessment was overly positive and contrasted with the sustainability appraisal. They identify a lack of information – such as ecological and environmental surveys – to support the allocation and identify concerns with ability of the developer to build homes in such quantities.

Ashurst Parish Council viewed the assessment of the site to lack objectivity, identifying that not one criterion was rated a very negative impact. They specifically identified the flooding/drainage criterion. They were of the view that the site (and other sites) conflicted with a number of other Local Plan objectives.

Shipley Parish Council identified that that the site would not conform to the Council's spatial strategy and was located away from they key areas of housing need and growth. The identified the lack of public transport options and that residents were likely to commute for employment. They were of the view that the proposal would not achieve sustainable development as required by the NPPF and expressed doubts that necessary infrastructure would be provided. As well as transport and infrastructure, ecological/environmental (particularly in relation to climate change) issues were raised, while viability concerns were also made that cast doubt on the ability of the site to be delivered or whether the particular developer had the experience to deliver it. A lack of available information to review the proposal also concerned the Parish Council.

Washington Parish Council commented that the level of development would impact on the rural character of the district and Upper Beeding Parish Council expressed concern in respect of flooding and the relationship with Strategic Policy 40 of the Local Plan.

Forest Neighbourhood Council referred to the site's remote location, without a railway station. They highlighted traffic concerns and viewed wildlife impact to be irreparable. Bolney Parish Council also expressed traffic concerns.

Henfield Parish Council felt that the site was located away from transport connections and employment centres, while also highlighting concern with flooding and questioning the viability given the high infrastructure costs.

The Inter Parish Group stated that the Buck Barn site would not have been included if assessed against the overarching strategies and policies of the Local Plan. There is no detailed information on the site, therefore providing a comprehensive response is difficult.

Other organisations

Sussex Wildlife Trust explained that the site comprises a network of ancient woodland, hedgerow and grassland. Concerned about severe ecological impacts on this network, in particular the Downs Link, Nutham Wood and Greatsteeds Farm Meadow LWS and connectivity of the site to the Knepp Estate of concern. Disagree with RAG rating for biodiversity. They viewed it extremely unsustainable in transport terms.

The Woodland Trust objected to the allocation of Buck Barn site given that the site includes three un-named areas of Ancient Woodland. Where sites are allocated adjacent to ancient woodland, a minimum 50m buffer between new development and the ancient woodland should be maintained.

CPRE Sussex objected to allocation citing a number of reasons including – impact on settlement pattern; landscape sensitivity; lack of sustainable travel options have been demonstrated; air quality impact on Cowfold; infrastructure pressures on nearby settlements, and questionable early achievement on new infrastructure; lack of provision of renewable technologies; impact on ancient woodland (including recreational pressure); SA concluding uncertain impacts on biodiversity and geodiversity assets.

Member of Parliament

Andrew Griffiths, MP for Arundel & South Downs, object to proposed allocation. He viewed that it would triple the existing parish settlements of West Grinstead and Partridge Green. He also commented that associated infrastructure is already overloaded, and will add to existing traffic congestion on the junction with the A24. The nearest rail station is Billingshurst which is at capacity, suffers a lack of car parking, and there is no bus service serving the station. The site is sandwiched between the South Downs National Park, Areas of Outstanding Natural Beauty, and protected forests; crossed by the upper and lower reaches of the River Adur which is prone to flooding as seen at the start of 2020. The area cannot sustain a large strategic allocation and is entirely the wrong location.

Land North East of Henfield (Mayfield)

| Support – Land North East of Henfield (Mayfield) | |
|--|----|
| Number of Comments | 20 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| Comments of support were few, but included: | |
| <ul style="list-style-type: none">- Best site for development from all those proposed or at least preferable to sites that those commented objected to.- Good location, close to the coastal towns with unmet needs (taking into account the Duty to Co-operate), and easy access to Horsham, Gatwick and M25.- Building new towns is preferable to extending existing settlements and delivery of all necessary infrastructure can be ensure and planned properly.- Would impact on less existing residents and prevent change to the district's character.- Would have less impact on wildlife and habitats.- Link road to the A23 would be beneficial. | |

- Would greatly help in attaining the required homes and balances more fairly between north and south of district. The northern part of District is suffering from an unacceptable rate of change, it needs time to absorb and re-grow its identity.
- Would boost existing businesses in and around Henfield enabling them to grow and trigger growth in the district and southern Gatwick Diamond area whilst increasing affordable / housing options in the area.
- The lower land prices enable more civic benefits, lower priced homes and better carbon standards.

Site Promoter

The Site Promoter submitted a large amount of detail in support. Reasons included:

- The site is well located within multiple housing markets and not subject to competition.
- The site was relatively unconstrained.
- A carbon neutral, sustainable settlement could be delivered with a mixture of housing types (including affordable housing).
- Transport proposals would help reduce traffic through existing settlements and a large, critical population mass would ensure public transport options alongside residents having access to local services by non-motorised means.
- Viable and deliverable (in the short, medium and long-term) and not dependent on public funding, with up to 4,900 homes being able to be delivered in the plan period in part, due to their relationship with Clarion.
- Would provide employment floorspace and would have good links to employment centres.
- Would provide green infrastructure above that required and achieve 10% biodiversity net gain and would utilise sustainable construction techniques for multiple benefits.
- Would provide all relevant infrastructure and address issues such as flooding and air quality, as well as taking into account landscape.
- Have experience in delivering large schemes.
- Would deliver gypsy and traveller provision should it be required.

In summary, they identified that their site could provide:

- Up to 7,000 homes (4,900 within plan period) of which 2,450 would be affordable.
- 160 hectares of open space/green infrastructure including sports pitches.
- 5 nurseries, 3 primary schools and a secondary school with 6th form and SEND.
- Employment and retail premises, including a pub and hotel
- Community facilities, including faith/community halls and health centre
- Wastewater treatment facility and other infrastructure to meet needs of new town.

They did state that they felt that both the site assessment and sustainability appraisal were flawed and should have been more favourable. Their reassessment would result in the site being seen as more positive and placing it ahead of other potential sites. Comments made in relation to the Council's housing target are covered in the relevant summary.

Statutory Consultees

Brighton & Hove City Council supported the plan's commitment to consider opportunities for helping to meet the unmet housing need arising from neighbouring authorities to the south. On this basis, it supported the commitment to assess the potential for strategic development on land north east of Henfield. It noted there remained a need to demonstrate deliverability and that the extensive infrastructure requirements would affect the timing of development.

Observation – Land North East of Henfield (Mayfield)

Number of Comments

26

Summary of Comments

Members of the public and community groups

A number of individuals and community groups made observations including:

- That any infrastructure deficits should be addressed and the development should meet all of its own requirements.
- Improvements to sustainable transport infrastructure in the area to the rest of the district would be needed (reopen the train line between Horsham and Henfield, small units with linked bus to amenities / trains, and provision of electric bikes and car groups)
- General comments that development should ensure flooding does not occur and does not impact upon water quality, habitats and species
- Queries if there will be enough affordable housing given property prices and whether a higher quantum could be provided.
- Queries about negative impact on existing nearby settlements and on issues around land ownership and deliverability.
- Development would generate the need for scouting facilities.

Parish Councils and Neighbourhood Councils

Pulborough Parish Council considered the site to be least damaging as far as infrastructure in the planning 'South' area due to its close location to the A23, and convenient access / egress junctions at Hickstead and Sayers Common providing access to Brighton, Gatwick Diamond and beyond. However they note that a market town on a greenfield site without rail connection runs the risk of gridlock at peak periods.

Horsham Trafalgar Neighbourhood Council stated that new settlements such as this site offer the potential to deliver services, facilities and open spaces without impacting on existing provision, or creating additional deficits because a new settlement has scope to fully mitigate their own impacts. However, such new settlements would need to deliver sufficient critical mass and scale in order to warrant the full range of facilities and services necessary to ensure self-sufficiency and sustainability, and it is an open question as to whether this is the case with any of the proposed new settlement sites.

Statutory Consultees

The South Downs National Park Authority (SDNPA) expressed concerns over how a number of sites, including this one, may affect the setting of the National Park and would welcome further discussions and the provision of further evidence. In general, they welcome a landscape led approach and seek recent comprehensive assessment of landscape impacts and consideration given to the impact on communities in the SDNP.

Highways England stated that there would be "impacts on A23 potentially at Hickstead A23/A2300 junction". In respect of infrastructure provision they make clear improvements to the A23/M23 (including its junctions) shall be funded via s278 agreements with Highway England (not via CIL).

Network Rail advise that the site is in proximity to the former Christs Hospital to Shoreham railway line. The alignment should be protected for future transport need.

Environment Agency advise that there are no critical issues, including water quality, that would prevent a wastewater treatment strategy being developed. Any development would need to be phased appropriately around the delivery of the necessary infrastructure eg new on-site wastewater treatment works.

There are two main rivers within the boundary of the site, these are the Chess Stream and the River Adur East along with a number of smaller ditches and watercourses. Have discussed on site natural flood management to reduce flood risk downstream which should be supported through any site allocation. Policy requirements must clearly ensure that rivers / floodplains are not developed, including a suitable buffer for climate change impacts. Must also consider and discuss other sources of flooding with the Lead Local Flood Authority. A comprehensive SuDS strategy must be developed and implemented. With regard to aquatic biodiversity we would wish to see suitable buffer zones along the watercourses and limitations in water course crossings. Where crossings take place these should be clear span. Biodiversity will be affected but design can minimise impacts and deliver net gains which should consider actions with the South East River Management to meet the requirements of the Water Framework Directive.

They include general comments on the sites highlighting that a number include river corridors or watercourses with associated flood zones. Whilst they note that these areas will not be built on there is no obvious application of the Sequential Test as required by the NPPF and PPG to consider whether these are the most suitable sites. This could be done via the SA but should at least be documented. This may be done as part of the Sustainability Appraisal process but should at least be documented. Where there are main rivers on site access to these will need to be maintained for the Environment, in addition Flood Risk Activity Permits (FRAP) may be required if the development is proposing works within 8m of the watercourse.

Southern Water made the following points:

- The existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development
- Limited capacity is not a constraint to development but planning policy and conditions must ensure occupation of the development is phased to align with the delivery of new wastewater / sewerage infrastructure
- This site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development prior to occupation (delivered via New Infrastructure charge and joint working between SW / developer)
- Southern Water's underground infrastructure crosses the site. Easements would be required and must be taken into account when designing the layout to ensure they are clear of all buildings and substantial tree planting
- The capacity of the local sewerage treatment works must also be considered in the master planning of the site and may require phasing of development. Funding for the work would be through the 5 yearly business plan rather than developer funded which would take time to investigate and implement the options for new / increased capacity.

West Sussex County Council made a number of general comments about the site assessment process and the relationship between the Local Plan and its statutory function. Specifically to this site, they wanted an inclusion of a reference to a Roman pit and 13th-century field system.

Natural England made a number of general points in respect of site assessments and evidence base. Of relevance to this site, they say a site of this scale is likely to impact views from the SDNP and that development within the setting of the SDNP has the potential to impact the purposes of its designation. Appropriate policies must manage the nature, scale and location of development within and in the setting of the SDNP which should be informed by relevant Management Plan, Character Area assessments and Landscape and Visual Impact Assessments and guidance. Should the site be allocated policy provisions must safeguard the Ancient Woodland from loss or damage in accordance with NE advice.

| Object – Land North East of Henfield (Mayfield) | |
|--|--------------|
| Number of Comments | 1,696 |
| <p><u>Members of the public, community groups and other consultees.</u></p> <p>A large response was submitted by Locals Against Mayfield Building Sprawl (LAMBS) of which was referenced in numerous responses by members of the public, community groups and other stakeholders such as CPRE Sussex, the Woodland Trust, Sussex Wildlife Trust, etc. The vast majority of comments mentioned some or all of the issues that LAMBS raised. To avoid repetition they are described below and have not been individually attributed to each respondent.</p> <p>A number of comments referenced matters covered in other summaries, such as the consultation being held during the start of the pandemic or that Government had alluded to changes to the planning system.</p> <p>Petitions and their number of signatories were also mentioned by way of highlighting the level of local opposition. There were a number of comments that suggested the use of the name 'Mayfield' was inappropriate and showed the Council had accepted the proposal in some way. A number of comments suggested that the issues with development of the site could not be adequately addressed by planning policies or the Council.</p> <p>Other issues covered were varied and comments included:</p> <p><i>General</i></p> <ul style="list-style-type: none"> - Poorly located, long distance from major transport modes, employment centres, etc. - The site was rejected during the examination into the HDPF. - Land not available with some landowners refusing to sell/work with site promoters. - Other sites would be preferable and/or urban extensions would be more suitable than new settlements. - Is above what is required to meet needs. - There is a lack of community support for development, which is contrary to elements of the NPPF. - The site assessment is not accurate with respect to some/all criteria or demonstrates that the site is the least appropriate. - Detailed information was not available and should have been made public. - Information provided by groups and members of the public have been ignored. <p><i>Deliverability/Viability</i></p> <ul style="list-style-type: none"> - Developers have no record of delivering a site of this size and/or may choose to sell on the site, causing delays - There is no assessment of realistic delivery rate and too many unknowns to provide confidence that development could deliver in the short and medium term. - The link road would need to be supported by other authorities, such as Mid Sussex District Council, who do not support the scheme. - CPOs would be needed to purchase some/most of the site as they are not in control of the land. - Infrastructure would be costly and/or would not be deliverable with some querying lack of detailed costings or Government backing. Particular reference was given by some to the cost of burying electricity lines and removing pylons. | |

- There is no/insufficient evidence that the site would be financially viable which means that infrastructure, community benefits and affordable housing would not be delivered as needed.

Landscape

- There would be an adverse impact on the setting of and views to and from the South Downs National Park.
- The landscape work submitted is insufficient and the landscape is more valued than identified.
- Landscape is unable to take development.
- The new settlement would result in coalescence with Henfield and smaller settlements like Twineham, Blackstone, Shermanbury and Wineham.

Biodiversity

- The impact on this criterion will be much more severe than assessed.
- The development would not be able to achieve biodiversity net gain as desired by policy/upcoming Environment Act.
- The impact on the environment is underestimated as it would cause loss of biodiversity and habitat/species loss. This included (but not necessarily limited to) loss of ancient or valuable woodland and hedgerows; impact on floodplains and hydrology; habitat fragmentation and disturbance to wildlife, including protected species (red-list).
- The impact on birds cannot be mitigated against.
- Conflicts with existing planning policies/draft planning policies on biodiversity.
- The draft HRA Screening Assessment is not sufficient.

Environment

- The proposal would have a negative impact on the South Downs National Park's Dark Skies which could not be successfully mitigated by any scheme and would negatively impact on the tranquillity of the National Park – one of its special qualities.
- Air and River quality likely to deteriorate from increased traffic and increased risk of pollutants and treated effluent discharging into the River Adur affecting the ecological and chemical status of the river and Adur Estuary SSSI.
- Adverse effect on the strong sense of history including the rural setting of a number of listed buildings, historic settlement pattern / farmsteads of medieval origin/ cottages dispersed along lanes/field patterns typical of Low Weald and ancient landscape.
- Carbon emissions will increase due to a reliance on and increase in vehicles and will have unacceptably impacts upon nearby AQMAs (Cowfold and Hassocks) and would contribute to the causes of climate change.
- No evidence the carbon impact will be minimised through design and on-site low carbon and sustainable energy generation.
- Urbanisation between settlements would be harmful to the character, damage countryside and Green Infrastructure.
- There would be a loss of land for food production.
- Development would impact on the ability for Henfield to grow sustainably.
- Poor quality design, layout and lack of public car parking on scheme shown.
- Development would not assist in achieving zero carbon target.

Flooding and Geology

- The issue is much more serious than identified by the Council in the site assessment.
- Large areas of the site are in flood zones 2 and 3 and this goes against policy in the NPPF.

- Only some of the impacts (surface water flooding) could be overcome whereas other issues could not be successfully mitigated.
- The site is regularly flooded and parts suffered from flooding recently.
- Run-off from development would increase risks to existing homes.
- The soil (weald clay) is not conducive to the provision of SuDS and will lead to flooding downstream.
- Climate change will increase the risk of flooding.
- Would need to pass the sequential and exception tests.
- Water treatment facilities would be needed to accommodate development.
- New residents would not be able to get insurance for flood damage.
- Proposal fails to take into account the increase in surface water run-off and treated wastewater discharging into the river Adur from the ongoing upstream Northern Arc development

Housing

- It would be unviable to provide affordable housing that meets requirements.
- The proposal does not address needs for different types of accommodation – such as those with dementia.
- Too much weight is put on the delivery of housing above other issues.
- No information provided regarding the number of Gypsy and Traveller pitches that would be provided.

Infrastructure

- No evidence to show how or when facilities (such as education, community, health, etc.) would be provided or that the relevant authorities could ensure that they were adequately staffed.
- Existing infrastructure is at or over capacity.
- There is no local hospital.
- No information about the link with Plumpton College provided.
- Proposal would negatively impact on current informal recreation and leisure opportunities, such as walking, camping, horse riding, etc. and impact on the network of public rights of way.
- Digital infrastructure insufficient to accommodate home working.

Transport

- No evidence has been provided to provide justification.
- Development would be contrary to different parts of the NPPF in relation to transport and sustainability.
- Residents would be car reliant and this could not be mitigated. There is no railway station and limited public transport, while it is too far from established commuting locations for people to walk or cycle.
- Nearby railway stations are already at capacity.
- The link road to the A23 is unlikely to happen and/or would cause environmental damage due to its likely route.
- Development would cause congestion on roads unable to deal with traffic increase and increase pollution throughout including in AQMAs.
- Increase in traffic would exacerbate safety concerns at particular points in the network.
- Development would conflict with measures secured in the Northern Arc development in Mid Sussex and/or has not considered cumulative impacts.
- Modal shift/self-containment assumptions are too optimistic/incorrect.
- Roads will be impassable during periods of heavy rainfall/flooding.

- Insufficient parking would be provided.
- Increased car traffic if new secondary school provided because surrounding area will lose free school pass.

Economic and Retail Impacts

- Employment would not be 'self contained' and people would commute both in and out.
- Negative impact on the local economy would occur, particularly in nearby Henfield. New businesses and retail facilities, especially larger shops, likely to threaten the vitality and retail viability of Henfield.
- Visitor Economy - HDC's Visitor Economy Strategy (2018-2023) focuses on the rural villages, which require strong visitor numbers to sustain communities. Development on this countryside visitor trail will reduce the tourism related visits impacting upon the local rural tourist economy, conflicting with the aims of the Council's Visitor Economy Strategy (2018-2023).
- The setting to Sussex Prairie Gardens is essential, thousands of visitors would be lost if the site was developed.

Parish/Neighbourhood Councils

Opposition to the proposed allocation was made by many parishes, including by the three Parish Councils that the site straddles (Henfield, Woodmancote and Shermanbury). Comments were made by the Inter Parish Group representing 17 Parish Councils, while individual objections were made by Parish Councils within both Horsham District and Mid Sussex. Some of the information submitted was similar or identical to the information submitted by LAMBS or other groups.

A number of comments covered the same issues and therefore are summarised as a group to avoid repetition rather than individually attributing views.

It was common for responses to question the need for the level of housing proposed, to refer to the lack of community support and to take issue with the use of the name 'Mayfield' in order to refer to the site. It was regularly mentioned that the site assessment was flawed and/or over-inflated the positive impacts and underplayed the negative impacts. A number of comments related to the relationship of the proposal to Neighbourhood Plans.

Other comments relating to the following themes included:

Deliverability/Viability

- Proposal is not deliverable, it would require compulsory purchase orders due to lack of landownership of key sections
- Large portions of the site are not developable (underground high pressure gas pipelines and offshore windfarm electricity cables, watercourses, etc.).
- Doesn't meet needs for either the Coastal or North West Sussex housing markets.
- Promoters lack financial resources and/or cost of infrastructure very high and may not be provided
- Insufficient evidence to show the site is deliverable or viable.
- Delivery rate not achievable and won't assist with meeting housing targets.
- It would not be viable for multiple large sites to come forward.
- Need could be met by extensions to existing settlements, which would be preferable.

Flooding and Geology

- The site has three watercourses running through it, 28 ponds and high water table.
- Land and roads in the area are subject to flooding.

- Increased flood risk will negatively impact on existing communities.
- A sequential flood risk assessment / combined flood risk analysis must take place before the site is allocated and take into account Burgess Hill's Northern Arc development
- A Surface Water Management Strategy is required which must, along with the wastewater solutions, take account of geology (Wealden Clay) and:
 - whole of the water catchment area in terms of flooding, groundwater and water discharge impacts on the River Adur (for both high and low water levels) and the impacts on the surrounding area / communities
 - likely effects of climate change both on site and downstream the River Adur from excess rainfall and fluvial and tidal flooding, and rising sea levels and tide locking
 - upstream Surface water and wastewater runoff from Burgess Hill's Northern Arc development
- Few, if any SuDS would work on site
- New river defences would significantly affect the pastoral landscape / ponds, and the increased wastewater discharge is likely to require larger areas of flood plain and impact on the ecological function of the River Adur
- Insurance will be unaffordable or unavailable due to flooding history
- Extra building costs affecting viability because buildings will need to be 'piled' to offset clay heave, and SuDs will need to be tanked due to high groundwater.
- A sequential test in line with national policy has not been undertaken.

Landscape

- Adverse impact on the setting of and views from the South Downs National Park
- Coalescence merging the settlements of Blackstone, Henfield, Shermanbury, Twineham and Wineham into a single conurbation with the new town.
- Site would change the character of the areas, changing from a rural to urban landscape.

Biodiversity

- Significant loss of biodiversity likely (ancient woodland / hedgerows / meadows / habitat loss; disturbance from noise, light; and fragmentation / habitats isolated; impact on protected species, etc.)
- The scheme would not be able to deliver a net gain

Environment

- pollutants and treated effluent discharging into River Adur likely to increase to an unacceptable level harming the rivers ecological and chemical status and the Adur Estuary SSSI
- Air quality, including within Cowfold's AQMA, likely to deteriorate due to increase in traffic.
- Proposal would impact on the South Downs National Park's Dark Skies status
- Adverse effect on 17 designated heritage assets, historic rural farmsteads and the historic settlement of Henfield
- Adverse effect on the hamlet of Blackstone, its 5 listed buildings and conservation area
- carbon emissions will increase due to a reliance on and increase in non-electric vehicles on minor, rural roads with no railway station nearby. Expensive bus fares / travel times and proposed A23 link road will increase car use further
- Development would contribute to causes of climate change.
- Regular power cuts in area will make use of electric vehicles challenging.
- There would be a shortage of water, exacerbated by the impacts of climate change.

Housing

- Scale of development too large
- Not a favourable location for employment opportunities (eg distant from Crawley / Gatwick / London and Brighton) and types of employment proposed within the new development are unlikely to be attractive to residents
- High property prices or reduced build quality will result due to the mitigation requirements.
- Affordable homes may not actually be affordable

Infrastructure

- Existing schools, GPs, etc at capacity and/or provision of new facilities likely to be inadequate or not built due to a lack of staff and a lack of viability
- Further clarification required around the link to Plumpton College
- Proposal would adversely impact existing rural activities taking place in the area (equestrian, cycling, walking, fishing, camping, Sussex Prairie Gardens etc)
- Would increase stress on policing.

Transport

- Severe adverse impact upon the existing highways network and transport systems causing congestion and air pollution and/or site is remote, rural location away from major transport infrastructure.
- Site does not benefit from railway service nor do closest stations have capacity.
- Development would increase accident potential (motorists, cyclists, horse riders, pedestrians).
- The claim that employment within the site will negate the need to travel is unrealistic as many residents likely to travel to Gatwick Diamond and other major employment areas.
- Bus service proposed unlikely to be financially viable for bus operators and/or an effective option due to the rural roads.
- Cars would be dominant mode of transport, going against policies within Plan/NPPF
- There is insufficient information regarding the delivery of proposed new A23 link road and/or wider traffic network would need major improvements which are not likely to come forward.
- Transport work needs to be based on sufficient evidence and take account of cumulative impacts of other development (such as Northern Arc).

Economic and Retail Impacts

- Employment would be based in other areas of the district and beyond / the site would be unattractive for businesses.
- Development would have a negative impact on the local economy, particularly in nearby Henfield
- Development would reduce tourism, with people being attracted to the rural character.

Statutory Consultees

Mid Sussex District Council (MSDC), objected to the allocation of this site, stating the following:

- MSDC experienced difficulties with major site delivery, i.e. the Northern Arc development, until Homes England was involved to resolve ownership and upfront infrastructure issues, enabling the Council to demonstrate a 5 year land supply. This experience should be material to any assessment. MSDC therefore doubts the deliverability of the site and considers it to be unsustainable and unviable.
- This allocation is not 'sound' as:
 - o It is not a sustainable or appropriate site

- It is not deliverable
- It is not supported by the infrastructure expected for a development on this scale
- The land necessary for its realisation has not been secured
- Lacks evidence demonstrating it can fund upfront infrastructure requirements, including the link road and junction on the A23
- It would be dependent on Mid Sussex for employment, services and transport links yet these have limited capacity. No credible evidence demonstrating 7,000 jobs could be realised in this unconnected location
- No basis to assume this development would be higher quality than others
- An objective and robust framework (technically robust assessment process) has not been applied which demonstrates this proposal stands comparison with other strategic sites or smaller site options

Members of Parliament

MP for Arundel and South Downs (Andrew Griffith MP) made specific objections to Land North East of Henfield:

- Wrong location and unsustainable, having an adverse impact on infrastructure and neighbouring rural settlements, lacks the necessary infrastructure and facilities, it is not well-designed, and fails to take into account the Northern Arc development near Burgess Hill
- The New Town will eclipse the village of Henfield and change its rural surroundings forever
- It is not deliverable – it is not ‘available’ for development due to lack of landownership, there are immense infrastructure costs in delivering a new settlement, proposal to underground the electricity cables is unlikely, and the inability to mitigate the flooding on the Wealden Clay fields
- 3 main watercourses cross the site
- Creation of 7,000 jobs is unrealistic given the full employment in the area, and impossible to suggest residents will not commute
- Will Increase traffic through Hurstpierpoint and Stonepound Crossroads, a designated AQMA, which cannot be mitigated
- The A281 and A23 already suffer peak time congestion
- Not supported by local community

General comments were also made that were common to this site as well as other potential allocations in his constituency. This included impacts on infrastructure and the National Park, planning blight on nearby residents, preference for small scale organic growth, impact on biodiversity, lack of transport facilities and flood risks.

MP for Mid Sussex (Mims Davies MP) objected to the development of this site for the following reasons:

- Significant flooding
- Very poor road infrastructure
- Total lack of rail infrastructure
- Lack of social infrastructure
- It is not deliverable or viable
- If progressed it will test the duty to co-operate with Mid Sussex District Council
- Not supported by the community (residents and businesses), Parish Councils or respective MPs for the area (past and present)

Developers/Site Promoters/Other landowners

A number of site promoters objected to the potential allocation, preferring sites that they were promoting. Objections related to:

- Poor location.
- Poor existing infrastructure and transport network.
- No railway station.
- Loss of farmland
- Not related to existing settlement

The owners of Sussex Prairie Gardens objected to the site, making reference to lack of infrastructure, impact on biodiversity and landscape, and the effect development of the site would have on the character and viability of Sussex Prairie Gardens, which is located in the centre of the area put forward for development.

The landowner of a large portion (198 acres) of the potential allocation explained that it was not, nor ever would be, available for development, and that a large part was prone to flooding and questioned why such constraints to deliverability had been overridden.

Land West of Crawley

Support – Land West of Crawley

Number of Comments

51

Summary of Comments

Members of the Public and community groups

Comments made by members of the public and community groups included:

- The site is the best of all available options and can utilise good existing transport links.
- Options for extensions to existing settlements (of which Crawley is the largest in the area) is preferable to new settlements.
- As HDC will be required to meet Crawley's needs under the Duty to Co-operate, it makes sense to locate development adjacent to its boundary.
- A western relief road is needed and can be planned for and delivered through this site.
- The site is near to existing employment at Crawley and Gatwick and near to infrastructure and community and leisure facilities.
- The site is the most sustainable option as it has the least impact on the environment and minimises need for car use.
- Site can be delivered quickly and deliver a large amount of houses.
- Has Government backing and appears to be deliverable as Homes England owns the land.
- The developer recognises the climate emergency and will work towards carbon efficiency.
- There does not appear to be a major risk of flooding.
- The character of Crawley would be unaffected and developing here would preserve the rural nature of Horsham District.
- This site would help the retail areas of Horsham and Crawley with extra footfall
- Larger sites attract more infrastructure which is a benefit and new estates can be planned for rather than infill development impacting existing residents, this is particularly important with current financial and health challenges of Covid-19

Parish Councils

Bramber Parish Council considered that the site offers the most benefit, if the proximity to Gatwick can be overcome.

Henfield Parish Council supported the allocation of this site because it is considered close to centres of employment and a railway line, there does not appear to be a major risk of flooding, land ownership suggests increased certainty of housing delivery and infrastructure requirements appear to be manageable.

Horsham Denne Neighbourhood Council (HDNC) considers it appropriate that where unmet from neighbouring authorities is being met within Horsham District, the housing should be provided in closest proximity to these areas (highlighting Crawley). HDNC considers that the involvement of Homes England in Land West of Crawley makes the site a more attractive proposition.

Hurstpierpoint & Sayers Common Parish Council acknowledged that Mid Sussex District Council is supportive of the work with Homes England to bring forward the Burgess Hill Northern Arc development. It was suggested that working alongside this government agency reduces the risk of not delivering on housing completions and increases the likelihood of the delivery of infrastructure, particularly prior to house building. They also considered that the West of Ifield site to be close to major employment centres, including Gatwick Airport and these factors should be considered in the assessment criteria for the site.

Site Promoters

As site promoter of Land West of Ifield, Homes England supports the proposed the strategic allocation Land West of Crawley, to form the first phase of delivery of a significant new community, west of Crawley. They also asked the Council to consider the wider benefits a larger strategic allocation for at least 10,000 homes and up to 10,000 jobs can make, as part of a new garden community and explained that as a Government Agency, Homes England can access upfront infrastructure funding, land assembly powers and increased market diversity.

Homes England considers that there is a compelling case for including Land West of Crawley as a larger strategic allocation for at least 10,000 homes in the Draft Local Plan, recognising that delivery will go beyond the Plan period but considered that if this was not appropriate at this time, the site would function as a standalone site.

They identified commitment to the delivery of the site and were of the view that their site accorded with objectives in the Local Plan and further opined that development would help address Crawley's unmet needs. Though agreeing with elements of the sustainability appraisal and site assessment, it suggested changes that would make the assessments of the site more positive and identified that there were no insurmountable constraints to development.

They consider that the site is supported by work undertaken, including in the following areas:

- Future Gatwick Airport Expansion – although there is no Government policy supporting a second runway to the south of the airport (R2), Homes England considers the proposals are consistent with R2. Homes England is taking into account potential expansion of the airport identifying design-led solutions/mitigation e.g. not building in the 60dB contour.
- Cumulative traffic impacts and need for Crawley Western Link – The Arcadis strategic modelling conducted on behalf of Homes England has indicated that the 3,250 homes proposal in isolation is unlikely to require a full link but is well placed to contribute towards a Western link if formed as part of a wider strategic allocation for 10,000 homes.

The area safeguarded for the link road in Policy SD3 of the CBC Local Plan and the North Crawley Area Action Plan recognises that routing and form requires further investigation.

- Delivery of social infrastructure – Homes England has engaged with West Sussex County Council and the relevant Clinical Commissioning Groups regarding the delivery of education and health provision, this includes discussions regarding not only mitigating the impact of development but also addressing extant requirements, including delivery of a secondary education site which is needed by the mid 2020's. Two new primary schools, a community hub and publicly accessible open space are incorporated into the masterplan.
- WwTW Capacity – The site is currently being modelled as part of Thames Water's capacity review within the Crawley catchment. According to Homes England, Thames Water has confirmed that solutions exist to provide adequate capacity for a minimum of 3,250 homes.
- Land Availability – Homes England is engaged with all the relevant landowners and confirm that land will be within Homes England's control to deliver new homes in 2022/23. Homes England advise that as a last resort, compulsory purchase powers can be used.
- Flood Risk – Homes England has been working with the Environment Agency to assess flood risk issues and confirm that a comprehensive flood risk and surface water drainage strategy is being developed. Further details will be made available during 2020.
- Landscape impact – Detailed Landscape Character Impact Assessments have been undertaken and are being reviewed to take account of the Horsham District Council Landscape Capacity Study (2020). These assessments will form the basis of a landscape-led masterplan.

Homes England highlights that the early delivery of homes and infrastructure on the site is a specific priority in Homes England's Strategic Plan 2018/19 - 2022/23, this includes a commitment to begin major infrastructure work and the construction of the first homes by 2022/2023. Homes England also commit to delivering the site in its entirety over the Plan period.

Homes England's intention is to act as a master developer, overseeing the delivery of critical infrastructure and controlling the site. It confirmed that the scheme is viable and it de-risks development opportunities to the level needed for the private sector to invest and build.

Homes England considers that the wider strategic allocation of 10,000 homes and 10,000 jobs is in line with the ambition of para 72 of the NPPF and can be delivered in accordance with Garden Town Principles, potentially as part of the Government's Garden Communities programme. A definitive boundary for the 10,000 unit scheme is yet to be determined and a "broad area of search" is being considered. Homes England considers that the wider strategic opportunity could be supported within the Plan and provides a strong policy framework against which the opportunity could be delivered. Options suggested by Homes England are a joint Development Plan Document with Crawley Borough Council in the form of an Area Action Plan (AAP) or a requirement for applicants of any early phase delivery to work with the Council to agree a strategic framework and demonstrate compatibility with it.

They explained in detail, the benefits of an AAP and the allocation of a full Garden town of 10,000 homes at this stage would bring. This included providing certainty to support delivery of infrastructure by partners.

Homes England sets out that the use of an AAP will provide long-term certainty to housing delivery across plan periods and beyond and also suggests that the benefits of allocating a wider strategic opportunity for 10,000 new homes will include. They explain that the land of the wider area would comprise land located north of the A264 from Faygate in the west, (including SA291 which

forms part of the identified Land West of Crawley in the Draft Local Plan) and would extend in an arc north west towards Crawley.

Crest Nicholson, Land West of Kilnwood Vale

As site promoter for Land West of Kilnwood Vale, Crest Nicholson, supports the strategic allocation of Land West of Crawley, explaining they had promoted the site through the Local Plan process for circa 800 dwellings and that since this time, an opportunity has arisen to promote a larger area of land to the West of Kilnwood Vale for at least 2500 dwellings. It is highlighted that this opportunity would be complementary to the wider strategic allocation for 10,000 homes promoted by Homes England and could form an early stage of this wider development, but also acknowledge that the Land West of Kilnwood Vale could be deliverable and developable as a standalone site. As a national house builder, Crest has adopted the Garden Village Principles when developing their sites and currently have an Option Agreement in place with the landowners.

Phase 1, which would form the originally proposed 800 dwellings, could be delivered at an early stage of the Local Plan period, benefiting from the existing sustainable transport infrastructure, green infrastructure and other facilities within the existing Kilnwood Vale development. Land West of Kilnwood Vale also offers an opportunity to meet a proportion of Crawley's unmet housing need.

Crest seeks to deliver a landscape-led scheme, in harmony with its natural and historic surroundings suggesting the scheme will feature the following place-making elements;

- Safe, attractive and sustainable community
- A neighbourhood with its own character but also integrates with existing development and surrounding landscape
- A permanent defensible boundary between Faygate village and Kilnwood Vale
- A balanced mix of tenure types and sizes including private rented and affordable homes
- Footpaths connected to countryside and woodland plus improved surfacing and wayfinding
- New housing to support viability of Kilnwood Vale local centre plus the communities of Horsham and Crawley more broadly
- Increased workforce for Horsham and Crawley and critical mass to support local services and facilities
- Infrastructure enhancements to improve accessibility to the local rail network
- Pedestrian and cycle routes to support healthy lifestyles
- Place-making approach incorporating views to the countryside
- Strong sense of integration with pedestrian, cycle and bus access to Crawley, Faygate and Horsham

Crest suggest that the recently constructed Calvert Link Roundabout plus the signalised junction 300m to the east of this roundabout, both constructed to support the Kilnwood Vale development, could provide access to the site and minimise the requirement for infrastructure to be provided at early stages of delivery. The site is also well connected to the A264 which forms part of West Sussex County Council's Strategic Road Network and is in close proximity to nearby urban centres, thereby minimising vehicular trips and journey lengths.

Crest confirmed that the Kilnwood Vale Primary School opened in September 2019 as a two form of entry school but provides the capacity to increase to 3 form of entry should demand require it. The A2011 and M23 provide access to Gatwick Airport which is less than 10 miles to the north east

and the nearest railway station is Faygate which lies approximately 0.7 miles to the west. An existing footpath (1561) connects to the railway station. Crest highlighted that discussions are ongoing with Network Rail and key stakeholders regarding improved rail access. Crest proposes that a similar approach to noise mitigation on the existing Kilnwood Vale scheme could be applied to the site, given the noise impacts from the A264 to the south and the railway line that bisects the site.

Crest states that biodiversity enhancements will be considered through sensitive master planning, in conformity with local and national planning policy and legislation. Retention, enhancement and protection of the key ecological features including the woodland blocks contiguous with the site, the north-south linear woodland belts and hedgerows, the green infrastructure running east to west and the pond and the watercourse contained within the site are all proposed.

As the Council has not yet published the Transport Study or the Viability Assessment, Crest reserves its position to comment on these documents when they are published. Similarly, Crest reserves its position to comment on future iterations of the Habitats Regulation Screening Report, and the Infrastructure Delivery Plan. Crest goes on to state that the proposals at Land West of Kilnwood Vale have the capacity to reflect the wider housing needs identified in the North West Sussex Strategic Housing Market Assessment (SHMA) and also highlights that there is an opportunity to explore diversification of the housing type offered, such as the inclusion of Build to Rent and retirement housing. However, the SHMA does not give consideration to First Homes, the Government's initiative for discounted market sale for first time buyers and therefore the Council should ensure some flexibility in the Local Plan policies to respond to future housing options and possible changes to National Policy.

Regarding the Interim Sustainability Appraisal of Growth Options Crest has provided their own observations in respect of the assessment of SA291.

They supported the vision set out in the Spatial Vision and Objectives, but consider that there should be some scope to formally acknowledge the District's symbiotic relationship with Crawley and the reliance Crawley Borough places on the District to meet their unmet need.

They also submitted a new SHELAA site submission sited to the north of the existing consented scheme, Kilnwood Vale. Crest supports smaller sites highlighting that they can make a significant contribution towards maintaining a continuous housing supply; supporting the viability of local shops and services; and are often relatively quick to bring forward.

Crest comments that the land is currently arable land but has the potential to link with the existing strategic development at Kilnwood Vale and would benefit from the existing supporting infrastructure. It could also form part of the wider strategic development for 10,000 new homes, west of Crawley.

Crest agrees with the allocation of smaller sites in addition to larger strategic sites and puts forward this additional land for consideration under 'Table 1: Smaller Sites with Potential for Allocation.'

Comments by other site promoters/developers explained:

- the site is well related to Kilnwood Vale, Crawley and Gatwick
- Development in this location would meet Crawley's unmet need
- Delivery on this development could deliver between 3,500 – 7,000 homes in the Plan period, starting at the northern and southern extremities of the sites

Statutory Consultees

Mole Valley District Council (MVDC) considered that Land West of Crawley could be an appropriate location to accommodate an element of Mole Valley's housing need, given the numerous constraints affecting the Mole Valley District that restrict development. MVDC acknowledges that this corner of the Gatwick Diamond Area where Horsham, Mole Valley, Crawley and Reigate and Banstead authorities meet is subject to considerable development pressure. Consideration will need to be given to the associated infrastructure impacts in this area and the need for cross-boundary planning for education and health provision in conjunction with potential development in Mole Valley District.

Observation – Land West of Crawley

Number of Comments

45

Summary of Comments

Members of the Public and community groups

General comments made by members of the public and/or community were usually made in either support or objection to the development of the site. As such, many observations are contained in those summaries and are not repeated below. Other comments mentioned that:

- There would be need for scouting facilities.
- It is unclear how/why Horsham and Crawley have reached different conclusions on the site.
- It was not obvious whether the assessment was made by HDC or Homes England.
- The early delivery of infrastructure would be needed to support development on the site.
- Larger, apartment type accommodation would be most suitable at this location.
- 10,000 homes on one site would need to be implemented over a long time period.
- The planning would need to be done by both Councils and involve local groups.

Statutory Consultees

Arun District Council commented that it is pleased that two of the options being consulted on in the Regulation 18 consultation seeks to meet the OAN for Horsham District as well as unmet needs from Crawley Borough Council and the Coastal West Sussex area. Strategic Site Option 5, Land West of Crawley, would create an urban extension of circa 10,000 dwellings adjacent to the Crawley area and would offer a significant potential contribution towards Crawley's unmet housing need.

The Environment Agency acknowledged that the site assessment recognises that there are environmental challenges associated with this site, with large corridors of the site within Flood Zones 2 and 3. They support that no development is planned in these areas, however, this should be clearer in the site profile. The Environment Agency has provided advice to the site promoters of Land West of Ifield and would be happy to work with the Council to inform the policy criteria. Development would need to ensure it addresses wider environmental impact and achieve environmental gains. A development of this scale represents risk of biodiversity impacts but also opportunities for enhancement. A strategic site allocation should include full consideration and should include enhancements required through the South East River Basin Management Plan to satisfy the Water Framework Directive. The Environment Agency also acknowledge that the site profile highlights constraints relating to wastewater treatment capacity. Engagement with the relevant water companies is recommended as early as possible. The Environment Agency highlight

that where new Wastewater Treatment Works are required an Environmental Permit would be needed from them.

Highways England highlights the potential for 10,000 homes and 10,000 jobs and states that a link from the A264 to the A23 is a key benefit of the scheme. They explain that a development of this magnitude will have an adverse residual impact on the adjacent M23 junctions as well as adding to the cumulative impacts of the overall plan. Accordingly, the development proposals will need to carefully consider the potential impacts to the strategic road network.

Southern Water explained that as the statutory wastewater undertaker for Horsham following comments in reference to the wider strategic allocation for 10,000 homes:

- The existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development
- Limited capacity is not a constraint to development but occupation of the development will be phased to align with the delivery of new wastewater infrastructure
- Southern Water's assessment has also revealed that Southern Water's underground infrastructure crosses the site. Easements would be required which should be taken into account when designing the layout
- The capacity of the local sewerage treatment works would also need to be considered in the master planning of the site and funding for the work would be through the 5 yearly business plan rather than developer funded which would take time to investigate

Surrey County Council highlighted the following:

- There is concern regarding the potential cross boundary impacts on the highway network in Surrey from the proposed strategic sites, including Land West of Crawley, Rusper. Surrey County Council recommend cross-boundary transport assessments should be undertaken and reference made to the CIHT's document "Better Planning, Better Transport, Better Places".
- The proposals at Land West of Kilnwood Vale could potentially have an impact on the education provision in the South Mole Valley school planning area. Officers would welcome discussions with the Council and West Sussex County Council on these matters

Thames Water comment that the scale of development is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.

West Sussex County Council made the following comments in relation to flooding issues associated with the site:

- The LLFA has concerns regarding the deliverability of the site and the proposed scale of development
- The LLFA is concerned that insufficient focus has been given, to date, to demonstrate the deliverability of 10,000 homes, outside the potential flood areas.
- Master planning the site should retain existing water flow routes and take into account the additional drainage infrastructure needed to support the development

- Highway corridors need to be sufficiently wide to incorporate SuDS and attenuation to be provided for storm run-off from hardstanding areas
- If this site is to be allocated, the LLFA strongly urge HDC to undertake a surface water management plan

Other Stakeholders

Department for Education is working with Homes England and supports the allocation for a school within the strategic site allocation SA101 (alongside SA291), commenting that:

- The need for secondary school in this location is based on existing unmet need in Crawley and need generated by the development
- The DfE has been engaged in a site search to locate Forge Wood High since 2017
- Forge Wood will be a 6FE secondary school with 6th Form (with a full capacity of 1,180 pupils)
- DfE has concluded that West of Ifield is the most viable option for delivering a secondary school
- There is an ambition to deliver the school expediently to meet local need arising from 2023

Gatwick Airport Ltd (GAL) acknowledge that the Draft Plan correctly identifies the potential noise impacts from the airport and the need for access improvements. GAL also states:

- For the most part, noise impacts could be addressed through careful design and mitigation measures, however, northernmost extent of the new settlement may not be able to accommodate housing or other noise sensitive uses
- GAL would be pleased to share predicted noise contours for GAL's future growth scenarios
- The surface access needs of the Crawley Western Relief Road (CWRR), and impacts on A23, need to take account of Gatwick's future development plans.
- The CWRR search corridor in the Draft Crawley Local Plan 2020-2035 is not compatible with land that would likely be required for an additional runway, south of the airport.

High Weald AONB Partnership notes that no potential allocations are proposed within the AONB and this is supported, however there are sites that are close to or abut the AONB boundary, one of which is the Land West of Crawley (10,000 homes). AONB advises that the Council should have regard to Planning Practice Guidance on AONBs. It is recommended that if this site is allocated, development proposals should be accompanied by an assessment of how they will affect the AONB, having regard to the High Weald AONB Management Plan.

Sussex Ornithological Society raised specific comments about the site:

- The Council should set a minimum of at least 40 dwellings per hectare which would result in less land take. Kilnwood Vale appears to have a very low density at 14 dwellings/ha.
- Land West of Ifield and Kilnwood Vale appear to score highly for species present on site and the Ifield area in particular appears to have a very high incidence of species of High (Red) or Medium (Amber) Conservation Concern or those listed as being of principal importance for conservation under Section 41 of the Natural Environmental and Rural Communities Act 2006.

Object – Land West of Crawley

Number of Comments

162

Summary of Comments

Members of the public and community groups

Friends of Warnham Nature Reserve objected to the West of Kilnwood Vale proposal, but not the wider site Land West of Crawley as a buffer zone between Horsham and Crawley must remain to avoid 'Crawsham'.

Ifield Golf Club submitted a number of representations objecting to the development of the site, including the submission of two petitions (one containing 1,072 signatures and the other 106). A letter from the Rainbow Trust, a beneficiary of the Golf Club, was also submitted, supporting the retention of the Golf Club for the benefit of the local community. Their comments included:

- Reference to changes to the golfing landscape since the Council's Sports, Open Space and Recreation Assessment (2014) and there was no evidence that the club was surplus to requirements, which would be needed to justify loss.
- Development would precipitate the inevitable closure of a successful, popular and viable club, without the provision of an alternative golf course.
- If Rookwood were also developed, there would be a further loss in golfing.
- Homes England has miscalculated the passion and strength of the golf club members and the community of Ifield and are assuming the golf club land is underutilised. They alluded to events with the site promoters and expressed that staff at meetings were poorly informed regarding the location of the relief road, the district's housing requirement and location of employment.
- Homes England has not demonstrated that it can comply with paragraph 97 of the NPPF
- The Local Plan predicts growth in over 65s and golf is one of the few leisure activities people in this age group can participate
- Development of this site would lead to the destruction of protected habitats and – even with mitigation – would result in a net loss of biodiversity, contrary to paragraph 175 of the NPPF and emerging legislation in the Environment Act.
- The loss of Ifield Golf Club would be contrary to the emerging Policies 45 and 46 of the draft Local Plan

Ifield Society submitted a number of objections raising multiple different concerns, including the following:

- Suitable mitigation cannot be achieved within 6 miles of a major, noisy and polluting airport and the site does not accord with the NPPF which seeks to limit or reduce the amount of people affected by aircraft noise.
- Development will cause more traffic jams, more pollutants and the relief road will not stop rat-running.
- The Ifield golf course is a mature, parkland course and should be protected and noted 8,500 trees planted by the Forestry Commission on Ifield Golf Course, many of which would need to be cut down, as well as many established oak trees within the site.
- The scheme would result in an environmental catastrophe and would not meet the Council's 'cared for environment' objective, while explaining there is no reference to the green infrastructure network and promises on biodiversity and green space are undeliverable.
- Concerns regarding harm to heritage assets and the ancient parish of Ifield.
- Flood plain issues have not been properly addressed and a Flood Risk Assessment was needed
- Given the comparable size and population of Horsham District and Crawley Borough a more even dispersal of population is required

- This site does not accord with NPPF principles (particularly Chapters 14, 15 and 16), nor the Council's spatial strategy, Spatial Vision and Objectives or emerging Policy 25
- A "presumption in favour of sustainable development" by the Council for proposals/planning applications relating to the wider site and parcels within it would be wrong.

Ifield Society also raised concerns regarding Home England's approach and commented that a map showing Kilnwood Vale as being permitted was misleading, while explaining that land north of the railway land should not proceed.

Wimblehurst Road Residents Association objected to the proposal because it uses a greenfield site which houses protective species and the surrounding area and existing infrastructure cannot support such a huge scale of development.

The Woodland Trust raised concern about the proximity to areas of ancient woodland, providing advice about buffers.

Members of the public raised similar points to those raised above and a number of comments felt that the site assessment was too positive. Other comments were made relating to the following themes:

The Loss of the Golf Course

- The club is well established and well used, with those who operate the course opposed to its loss.
- The golf course should be kept as in other places but the proposal results in the loss of a sports and social facility will have social and health impacts
- The golf course provides financial, social and environmental benefits to the local community
- If the course is not viable, it should be maintained as a public park and/or alternative provision should be provided.
- The families of past members have placed 20 memorials on the Ifield Golf Course.

The Environmental Impact

- Loss of natural green space includes a diverse range of species and habitats including ancient woodland and hedgerows.
- Development would impact on Ifield Brook Meadows (LWS) and the land to the west has been identified as a Biodiversity Opportunity Area and development would destroy this potential.
- Brownfield development would be preferable to greenfield sites.
- All the large strategic sites will not enable HDC to meet its motion as passed in June 2019 to "ensure that we actively contribute to achieving a net zero carbon target through our activities"
- Lack of clarity over what 50% green space and 10% biodiversity net gain mean. If 50% is green space, the other 50% is development, therefore 50% of the existing biodiversity will be lost.
- Development would impact on Crawley's AQMA and would increase pollution more generally.
- Loss of land for food production.
- The site is rich in archaeology dating back to the medieval iron industry.
- No commitment to any carbon reduction or sustainability targets

The Principle of Development

- Scale of development is too large/too many houses for this area.
- Development would increase the likelihood of Horsham and Crawley joining up (with a number of objectors referencing 'Crawsham').
- Small developments, extending towns and villages are the best way forward, not new settlements.
- The site should not be taken forward given the negative impacts identified in the HDC and LUC assessments, particularly in an area that is already blighted by Gatwick Airport.
- Horsham should build in their District, not on top of Crawley.
- This site would negate Spatial Objectives 6, 7 and 8 as set out in Chapter 3.

Flooding

- The land soaks up a huge amount of rainwater and its loss would lead to increased flooding, with people evidencing recent flood/weather events.
- Not only will weather make flood risk higher but soil poverty and uprooting of plants and trees (exacerbated by construction) has the same effect.
- Consideration should be given to not only the flood risk we face now, but what might be expected in 20, 30 years' time.
- Insurance premiums are already high in this area because it is a known flood risk and new residents will not be able to get house insurance on properties built on flood plains.

Community

- Development would lead to a loss of much used public footpaths.
- Numerous concerns regarding infrastructure in terms of pressure on existing infrastructure and/or that insufficient infrastructure would be provided. This included in relation to schools and health facilities, traffic, public transport and parking, energy and water, recreation and community facilities, with some comments pointing to lack of delivery at Kilnwood Vale as an example.
- Would impact on existing residents, such as crime and increased car and HGV traffic.
- Would further impact problems with roads, with it being identified that it does not have direct access to a major road without going through residential or industrial estates, unlike all the other strategic sites. A number of comments referenced issues with the relief/link road and the developer's commitment to it.
- Concern over how Homes England propose to respect Rusper Road which is an Area of Special Local Character.
- Lack of employment consideration and no guarantee of 1 new job per home.
- Developer has not identified enough Gypsy and Traveller pitches

Deliverability

- It is unlikely that the quantum of homes would come forward on the site as desired in the plan period given the amount of large developments nearby – Kilnwood Vale, North Horsham Strategic Allocation, etc.
- The site would not viably provide 35% affordable housing.
- The Council is too reliant on large sites.
- The site may not be needed given recent events (Brexit and the Pandemic).
- Concern whether the houses will be needed given current economic situation (including the threat of the pandemic) and Brexit

Members of the public and community groups made the following suggestions if the site were to be allocated:

- Electric buses on bus lanes in rural areas into Manor Royal/Gatwick will ease congestion and help towards the low carbon economy.
- Water catchment areas to ensure resource is saved and accessed by population.
- Development of play areas and wild areas for the residents and wildlife.
- Car charging point plan for solar panels, allotments and shared green space to counteract climate change.
- Need guarantees of infrastructure delivery before development is allowed, particularly the delivery of the relief road.
- An environmental study should be carried out, with full public participation, on the visual impact of development.

Parish/Neighbourhood Councils

Colgate Parish Council made the following comments on this site:

- Horsham District Council should categorically resist taking on any neighbouring extra housing requirements, through the 'Duty to Co-operate' – the extra housing is needed in Crawley as that is where the work is, not elsewhere.
- If this site proceeds the parish council would insist that a crossing on the A264, near Faygate Roundabout, would be a necessity and must form part of the planning consent.
- The road infrastructure must be installed at the outset of development.
- Kilnwood Vale has no safe cycle or pedestrian route to either Horsham town or its 'parent' village of Faygate.

Forest Neighbourhood Council (FNC) considers that it is essential that infrastructure is delivered before any housing is built (for all sites set out in Policy 14). They did not think the site should be included in the Local Plan and made the following comments:

- Insufficient information and knowledge of this site at the exhibition, particularly with regards to road layout, open spaces, flooding, heritage and the extent of the site.
- Development would result in unacceptable coalescence between Horsham and Crawley.

Rusper Parish Council objected, making the following comments:

- The site description states that this is "adjacent to the busy road network", but it is not connected to any A or B roads and any exists from this site would be onto unclassified neighbourhood roads in Crawley or narrow country lanes in Rusper
- The land shown in red on the plan is only part of the Homes England proposals, which is highly mis-leading
- The larger 10,000+ homes proposal is equivalent to destroying almost half of the countryside in Rusper
- Unclear how the rating for biodiversity can be anything but red
- Rich wildlife habitat within Ifield Brook, the golf course and the fields and hedgerows
- Concern regarding the loss of the golf course, which is an important local amenity
- Unclear how the viability section of the draft Local Plan considers there is potential for development of the site to be viable but the HDC SHELAA 2018 Housing report shows the site as 'Not Currently Developable' and reference should be made to findings at the time, relating to flooding, the setting of Ifield Conservation Area and the Gatwick safeguarding area and noise contours
- Proposals states the development provides "*a clear vision for the site has been identified, based on Garden Community Principles*" but this is untrue as the site only has a rough area outline, with no densities, facilities and no details of how traffic will be managed or a route for the relief road
- No justification for a development of this scale

- The proposed site would break every policy in the Ruspur Neighbourhood Plan and render the Plan useless
- Settlement coalescence between Horsham and Crawley

Statutory Consultees

Crawley Borough Council (CBC) objected, due to landscape, heritage, flooding, climate change, economic/employment concerns and health care, which is already over capacity.

CBC also made the following comments regarding the site:

- The location is extremely sensitive and offers Crawley residents one of the best opportunities to access the countryside
- CBC supports the principle set out in paragraph 3.19 and where development is adjacent to, or impacts Crawley, consideration should be extended to the pressure on existing infrastructure and community facilities within Crawley.
- If wider 10,000 homes is allocated this will need careful consideration as to how it is presented in the plan and key diagram – as the site would come forward in more than one plan period
- Any smaller development, part neighbourhood or smaller incremental development should not be allocated or supported until a full masterplan has been prepared, so that proposals can come forward comprehensively
- If this site is allocated, the requirement for one job for each new dwelling requirement will require further discussions between the Councils as this approach is not considered appropriate in relation to urban extensions. This is particularly important when considering employment need and to ensure Manor Royal and Crawley town centre are not undermined.
- There is a known unmet need for Secondary education in Crawley for which there is funding available but no site in Crawley; this provision could be included within a larger school than necessary for the new development (and funded separately).

CBC also sets out that, if the site is allocated, the scheme must in particular meet the following requirements:

- Is masterplanned over a number of Plan periods
- Sufficiently meets Crawley's unmet housing needs
- Ensure the site 'fits in' with Crawley reflecting the needs of both authority areas
- Is progressed in a way that meets Government commitments to net zero carbon emissions by 2020
- Is developed based on a strong neighbourhood principle, avoiding 'bolt-on' urban extensions
- Delivers a minimum of 40% affordable housing
- Secures nomination rights for at least 50% of affordable units
- Delivers in full and in advance of the first phase of residential development, a "climate change emergency future proofed" multi modal "Crawley Western Relief Road"
- Sets out an "Area of Search" for the relief road as CBC has done
- Provides an exemplar of sustainable development including green infrastructure and energy from waste
- Requires water usage of 80 litres/person/day on this site
- Respects the historic setting of Ifield village, including the countryside beyond the Conservation Area, views of the Grade I Listed Church and the rural character of the footpath
- Protects and enhances Ifield Brook Meadows

- Protect Ancient Woodland and other environmental assets
- Is masterplanned based on Crawley's character and the character of rural Horsham/Rusper
- Maintains access from western edge of Crawley into open countryside
- Demonstrates credible flood protection/mitigation solutions
- Meets in full and in advance, education and health infrastructure needs
- Meets in full and in advance any sports' needs, using Crawley's standards, alongside HDC's studies
- Delivers a clear employment strategy
- Ensures strategic infrastructure is planned and provided up front, including railway infrastructure
- Ensures sustainable transport infrastructure is integral to the design of the development
- Improves sustainable travel for existing Crawley residents
- Ensures the development is Local Plan-led and policy compliant with both CBC and HDC policies

Additional comments put forward by CBC in relation to the Land West of Crawley included:

- CBC has prepared a draft Policy in its Local Plan relating to urban extensions (Policy H3g). It is critical that CBC remains fully involved in discussions with HDC (along with Homes England and WSCC) should this site be progressed in the Horsham District Local Plan.
- Whilst CBC supports the key principles set out in in draft Policy 15 Strategic Site Development Principles, it is considered that there is a need for a bespoke policy position for Land West of Crawley, due to its significant scale and location adjacent to Crawley
- There are areas within the northern area of the Land West of Crawley site which, because of air traffic movements, are subject to unacceptable levels of noise for noise sensitive uses, including housing, particularly at night and these should not be permitted

Natural England made general comments about how sites should be assessed. Specific comments on the site set out that it lies adjacent to areas of ancient woodland, which is identified in the NPPF as an irreplaceable habitat (para 175) and that it expects policy provisions to safeguard this habitat, should this site be taken forward.

Other Consultees

CPRE Sussex objected to the proposal, citing that the scheme is not sustainable and also made the following comments:

- The 'CPRE Aircraft Noise Study Findings Report' (July 2019) shows that the northern part of the proposed site is within the Gatwick Airport noise contours 45db to 60db – noise exposure at these higher levels results in adverse health effects
- The 'CPRE Flight Blight: the social and environmental cost of aviation expansion' (2019) sets out the health impacts of air pollutants
- Concern over the loss of a green lung for Crawley residents
- HDC's assessment does not mention the network of hedgerows
- The biodiversity rating of neutral impact is invalid because it would appear that the site has not been surveyed
- Unclear how 10% biodiversity net gain would be achieved
- Unclear how the scheme would meet the requirements of paragraph 97 of the NPPF which relates to open space, sport and recreational buildings

Sussex Wildlife Trust (SWT) has significant concerns over the environmental evidence base and the sustainability appraisal in relation to all sites. In respect of this site, they objected explained that:

- The full extent of the site is not clear as the commentary in the site assessment and in the SA appear to refer to different ecological receptors e.g. the site assessment states that a SSSI is contained within the site, which SWT believe is House Copse SSSI, but this is not clear as it is outside of the red line map.
- SWT acknowledges that the wider area is being considered, but suggest that it is vital that the true red line boundary is made clear
- SWT is very concerned about the impacts on Ifield Meadows LWS. There is no comment on how development will impact its functionality within the District's wider ecological network.
- Query the reality of true biodiversity net gain when the proximity to Gatwick could restrict the type of habitats that could be created/enhanced
- They could not find any mention of Willoughby Fields LNR which is concerning given its proximity to the area of search for the link road. This is a fundamental issue and SWT do not agree with the neutral RAG score for biodiversity
- Each strategic site should have a Council-led Preliminary Ecological Appraisal

Site Promoters/Developers.

Objections by the development industry often were presented in the context of supporting the allocation of sites they were promoting. Specific comments included:

- Land West of Crawley will not contribute to the vitality and sustainable growth of Ruspur
- There is no single site promoter and deliverability is a concern
- Concerns regarding flooding and wastewater
- Landscape concerns, not least due to the site adjoining the AONB
- Heritage impacts
- Coalescence of Crawley and Horsham
- Proximity to Gatwick Airport and noise and pollution impacts
- Deliverability of this site within the Plan period appears to be a key concern
- The site area is not defined.

Land at Kingsfold (North West Horsham)

| Support – Land at Kingsfold, Warnham (North West Horsham) | |
|---|-----------|
| Number of Comments | 12 |
| Summary of Comments | |
| <p><u>Members of the Public and community groups</u></p> <p>There were relatively few supportive comments from members of the public. Comments of this nature included the following:</p> <ul style="list-style-type: none"> - Site straddles an existing railway line where a railway station could be built, encouraging sustainable commuting. - Potential for good transport links, both road and rail, to employment. - The site is deliverable with a small number of land owners. - The site does not present a flooding risk to local communities. - Strategic site which is located close to centres of employment north of the district near Horsham, Crawley, Gatwick, Surrey and London. - Development of a new settlements, which over time will become a self-sustaining community with complete range of jobs, services, schools, open spaces and high quality community facilities. | |

- New settlement where infrastructure and jobs can be designed from the outset to best provide for the scale of the settlement envisaged rather than inadequate retrofitted infrastructure.
- Free from environmental constraints. However, footbridge should be added over the railway line to mitigate the impact of a separation between the two halves of the site.
- Sensible option given DtC with Surrey Districts.

A number of those who were supportive of development at the site, indicated that their support was contingent on infrastructure, quality housing, recreational space, etc. being provided.

Parish Council

Henfield Parish Council expressed support for the allocation of the site on the basis of it being close to employment centres, on a railway line (facilitating sustainable commuting), low risk of flooding and a strong prospect of delivery.

Site Promoter

A representation was made by the site promoter who are supportive of the proposed allocation of this site. Several technical studies were also submitted in addition to those already put forward to the Council. These included a Property Market Appraisal (Economy), Landscape & Visual Appraisal, Ecological Report, Heritage Appraisal and Transport Strategy.

The Place-making Summary, outlined the proposed mix use development of 1,300 dwellings (potentially more) including full affordable housing provision, a local centre for retail, amenity and leisure needs and intensification of the existing Broadlands Campus to provide 75,000sqm of B1, B2 and B8 usage which would yield c3,000 new jobs. The document also listed a number of key community benefits that development of the site could deliver. This includes, but is not limited to, a fully funded Kingsfold A24 relief road, new primary school, medical centre (subject to demand) and a new Parkway Station with possible Park & Ride.

The proposal is a landscape-led phased master plan offering five villages of high quality design rather than an urban extension. It will include energy efficient measures throughout and will provide net-gain in biodiversity including re-wilding 60ha of arable land.

The promoter states that they can deliver the A24 relief road and at least 800 houses on the west side of the railway starting in the first three years of the plan period. In parallel to this, their aim is to promote (and deliver) a high quality business park of offices, research and industrial which will be accessed initially off of Langhurst Wood Road. It is also stated that the proposal can accommodate urgent or short term housing needs.

The representation emphasises the sustainability benefits associated with building houses next to jobs as well as the locational advantages of being sited in the north of the district from both a sustainability and economic perspective. Development in the north of the district ensures that business traffic will utilise the A24 northwards to the M25 and London and the A264 north eastwards to Gatwick and the M25.

Notwithstanding supporting development on the site, the promoter recommends that the assessment of the site, against most of the criteria used, should be altered and viewed more favourably as outlined below:

- Have a neutral landscape impact (rather than unfavourable impacts). Existing landscape features would be used to structure the site and create green corridors. The site is

generally well screened and loss of hedgerows and woodland can be reinstated. Change in landscape character and views is mitigated by comprehensive green infrastructure including improvement to the accessibility of landscape as detailed in Landscape Visual Assessment.

- Have a favourable biodiversity impact (rather than neutral), citing that development is committed to a biodiversity net gain and through the creation of extensive areas of green infrastructure a contribution towards local biodiversity.
- Score neutrally on archaeology / cultural heritage impact (rather than unfavourable impacts). Limited potential for presence of archaeological remains, a programme of further investigations will likely be required to identify appropriate mitigation. Limited designated heritage assets likely to be affected, although there may be potential for development to be visible from Kingsfold Place (Grade II Listed Building). The significance of any impact on the setting of the listed building would need to be assessed.
- Have a favourable climate / renewables / energy efficiency impact (rather than neutral). Proposals include potential to incorporate renewable energy generation and electronic vehicle charging points, as well as locating jobs close to homes minimising private transport means. Cited strong track record of producing energy efficient, environmentally sustainable development.
- Score very positive housing impact (rather than favourable impacts), citing at least 1,300 new homes committed to 35% affordable housing and the potential to meet gypsy and traveller requirements, representing a very substantial contribution to housing requirements.
- Score favourable education impacts (rather than unfavourable impacts), stating development proposes a new primary school and promoter engaging with WSCC.
- Have neutral health impact (rather than unfavourable impacts), citing development proposes wide range of community facilities / services to ensure settlement can become self-sustaining community. Also includes land reserved for or the provision of additional health facilities.
- Have very positive leisure / recreation and community facilities impact (rather than favourable). Significant open space, including a new community park and re-wilding of 60ha of arable land together with improved rights of way.
- Have very positive transport impacts (rather than favourable impacts) stating development incorporates fully funded Kingsfold A24 relief road, together with a new Parkway Station with potential for park and ride. Homes located adjacent employment will reduce transport demand and travel distances. Details set out in Transport Strategy.
- Score very positive with other infrastructure impacts (rather than neutral impacts). Development proposes wide range of community facilities / services to ensure settlement can become self-sustaining community. Also includes land reserved for or the provision of additional health facilities.
- Have very positive economic impacts (rather than favourable impacts), stating that proposal includes high quality business park of up to 75,000sqm of offices, research and industrial uses creating in the region of 3,000 new jobs, see Property Market Appraisal.
- Score favourable retail impacts (rather than unfavourable impacts). Proposal would provide a range of community facilities / services to ensure new settlement can become self-sustaining community.

In addition to the overall site promoter a separate representation was received from the landowner of the northern end of the allocation (between A24 and the railway line). The representation was supportive of the overall allocation of Land at Kingsfold for approximately 1,000 and of the Council's assessment of the site. In their view, the scale of the development has the potential to incorporate affordable housing and accommodation for the elderly which will

benefit the wider community. In addition, it could include provision for employment floor space, retail, education, health, recreation and sports and community facilities.

The representation also stated that the capacity of the site could be greater than this with the area to the west of the railway line capable of delivering 800-1,000 dwellings and land to the east a further 500 dwellings plus employment space. The whole site would be deliverable within the plan period, although it is considered that a site of this size would need to be delivered in phases. Land to the west of the railway line could be delivered in the early part of the plan period (within 5yrs), with land to the east in the later part of the plan.

The landowner acknowledges that the site has some constraints including ancient woodland, archaeological and flood risk. However, it is considered that these could benefit future occupiers in terms of public open space and landscape features.

Observation – Land at Kingsfold, Warnham (North West Horsham)

Number of Comments

17

Summary of Comments

Members of the Public and community groups

Few comments were received but one comment made a general observation that the site had good road and rail transport.

Parish Council

Henfield Parish Council state that there are inconsistencies in site appraisals. It is suggested that the Council consider some form of comparative analysis mechanism to assess the sustainability of the strategic sites.

Bramber Parish Council make the observation that development of small communities in rural areas seem counter to many policies within the Local Plan.

Statutory Consultees

Surrey County Council identified that development of this site could impact on Surrey in both terms of transport and education; including potential impacts on the provision of school places and the need for an assessment of the potential cumulative cross boundary transport impacts.

West Sussex County Council Environment & Heritage Team provided high level comments in relation to the archaeology of proposed sites. In relation to Kingsfold and the Site Suitability Summary, additional wording has been requested – 2nd Paragraph: add after last sentence that the land includes a medieval moated site at Moat Copse, a non-designated but significant heritage asset.

Mole Valley District Council welcomed the provision of Gypsy and Traveller accommodation, as well as early education provision, a new primary school and SEND provision. Mole Valley also pressed for the inclusion of a new healthcare facility, if required. However, concerns were raised with regards to the potential cumulative and cross-boundary impacts on traffic growth should both local plans proceed in their current form.

Southern Water explained that development of this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement would be provided through the New Infrastructure charge to developers. The capacity of the local sewage treatment works would also need to be considered in the master

planning of this site. It was also stated that occupation of development will need to be phased to align with the delivery of sewage infrastructure.

Highways England have stated that the site “is likely to cumulatively add to the impacts already predicted as a result of consented development at Land North of Horsham which has already agreed mitigation to the M23 Pease Pottage junction.”

Network Rail state that there are three level crossings in the vicinity of the site and the impacts of the development on these level crossings will need to be assessed and mitigated appropriately. The development should include fencing of the railway due to there being provision for a school and it is recommended that the bridleway is downgraded.

Other Consultees

Gatwick Airport Ltd commented that if this option were to be taken forward a number of properties would be exposed to levels of noise from the future development of Gatwick and some would therefore require mitigation. It is also unclear what effect this site would have on traffic on the surrounding road network including the A23.

Object – Land at Kingsfold, Warnham (North West Horsham)

Number of Comments

56

Summary of Comments

Members of the Public and community groups

Friends of Warnham Nature Reserve objected on the basis that this proposed strategic site could merge over time with North Horsham and the proposed strategic site Land West of Crawley (up to 10,000 homes). They were of the view that sites in the south of the district should be allocated in order to even development.

Rudgwick Preservation Society were of the view that a series of hamlets / villages divided into two by the railway line, without a main centre are unlikely to work due to lack of cohesion.

CPRE Sussex objected on multiple grounds, including:

- Landscape has a strong rural character and due to its undulating nature the site is highly visible from a number of vantage points.
- Site is close to listed buildings which would be adversely impacted by development.
- Promoter committed to biodiversity net gain but no information on how this will be achieved has been provided, particularly as the proposed road upgrade would result in the loss of ancient woodland. Neutral impact should be amended to very negative impacts.
- It does not form a single new settlement. Neither individually nor collectively would be significant size to be self-contained and offer full range of services / facilities for day-to-day needs leading to a reliance on Horsham town, generating additional infrastructure pressures.
- The site is divided in two parcels by the railway line. Improved pedestrian and cycle connections can be demonstrated but no vehicular access is proposed making it difficult and unlikely to generate community cohesion.
- No evidence that Network Rail or the train operating companies have endorsed the provision of a new parkway station as being feasible.
- Pedestrian and cycle access to Horsham town is considered poor, with the main route via the A24.

Sussex Wildlife Trust identified disagreement with the current neutral impact scoring for biodiversity. The promoters have indicated that ancient woodland will be removed by the proposed road upgrades to the A24. Ancient woodland is an irreplaceable habitat, the loss of which cannot be mitigated. The proposal to remove ancient woodland is contrary to paragraph 175 of NPPF. They felt scoring should be amended to very negative impacts.

Concerns were also raised as to how the far eastern side of the site, which is separated by ghyll woodland along Boldings Brook, would be accessed via the main development without severing this important linear feature and priority habitat.

The Woodland Trust objected to the allocation of all sites, including Land at Kingsfold, which include ancient woodland and proposes removing such sites from the list of potential development sites. In respect of sites adjacent ancient woodland, request a minimum buffer of 50m between development and the ancient woodland (including construction) unless a smaller buffer can be clearly justified. The buffer should be larger for significant engineering operations or after-uses that generate significant disturbance. The intense pressure for development makes the protection of ancient woodland and veteran trees all the more important and the regard to be given to para 175 of the NPPF.

In addition to the points above, other comments included:

- Warnham has a 'Made' Neighbourhood Plan and the Local Plan should recognise that this has been voted for on the basis that their housing commitment is fixed until the end of the current local plan period (HDPF). Any additional housing should be for the revised plan period. All neighbourhood plans that are 'Made' should be honoured for the period of time the plan covers.
- The concept of five separated villages is unsustainable. Settlement would be reliant on Horsham and Dorking for services and facilities.
- Question the viability that a development of 1000 homes could financially support a bypass, parkway station, village facilities, affordable housing, school and Gypsy & Traveller site.
- The development would increase traffic through Warnham village, Friday Street and Green Lane (located east of site) and on A24 between Dorking and Horsham resulting in and exacerbating congestion on roads unsuitable for such increases.
- Detrimental impacts on wildlife and environment would result.
- Land is already prone to flooding even with 30 acres of soil and vegetation to soak away the increasing rainfall. Flood risk stretches the length of Boldings Brook and the River Arun.
- Negative impacts on existing local residents including, but not limited to, air quality, noise, property prices and country views.
- It is not desirable to develop agricultural land which should be protected to ensure food supply for current and future generations.
- A24, between Great Daux roundabout and Clark's Green, will need to be upgraded to a dual carriageway at a future date. Improvements to the A24 should be made before any new development is considered.
- Area has taken large amount of housing with North Horsham located north of A264.
- Queries adequate Duty to Co-operate as development would contradict Mole Valley District Council's designation of 'Land Beyond Green Belt'.
- Archaeological site would be lost or damaged if developed.
- Site is contrary to criteria and objectives as set out in other policies within the Draft Local Plan.

- Insufficient infrastructure provision to cope with existing settlements.
- Development must be considered against legal obligations implemented by the Paris Climate Agreement.
- Site Assessment in relation to favourable transport impacts should be reviewed as inconsistent with assessments of other proposed sites.
- Promoter states that land for Gypsy & Traveller site can be provided but is not specific in the number of pitches.

Parish/Neighbourhood Councils

Warnham Parish Council state that the concept of five new villages is not considered sustainable due to the reliance on cars to access education, retail and essential services. The Parish also question whether development of 1,000 dwellings would be sufficient to fund the highway works and other infrastructure proposed. Other reasons for objection included:

- Recently 'Made' Neighbourhood Plan.
- The site has areas subject to flooding.
- It is undulating and visibly exposed.
- Loss of ancient woodland.
- Does not meet some requirements of the NPPF.

Rusper Parish Council objected on multiple grounds, including:

- Improvement to A24 are limited to Kingsfold. The remainder of the A24 between Horsham and Capel, which remains a single carriageway, is not addressed meaning that traffic from this site would be adding to the already significant problems along this stretch of road.
- Access onto the eastern side of the site would be via single track country lanes which could not support the increased level of traffic.
- Concerns over the concept of developing east of the railway line without a major rail crossing.
- No indication of how secondary education would be managed.
- It is unclear as to how development of this scale, with the nature of infrastructure required, could be financially viable.
- Potential impact of Gatwick's proposed expansion on noise and air pollution combined with the approval of the incinerator need to be considered with regards to air quality.
- Environmental impact not addressed, with much of the area having ancient hedgerows and Ancient Woodland at Old Barn Gill.
- Contrary to the policies within the Rusper Neighbourhood Plan (Regulation 16).

Nuthurst Parish Council stated that strategic sites should be located in, or adjacent to, existing towns such as Horsham and Crawley and existing large villages such as Broadbridge Heath, Billingshurst, Southwater and Henfield where there are employment opportunities and infrastructure. Not in unsustainable locations in the middle of open countryside where there would be a reliance on cars to commute to work or access services and leisure and entertainment.

Forest Neighbourhood Council made the following comments of objection:

- Unacceptable change in the settlement pattern of Kingsfold.
- Fragmented development across a wide area with limited access between each village.
- Loss of Ancient Woodland.
- No details in relation to how biodiversity net gains have been calculated and what these gains will be.
- Unfavourable impact on the landscape.

- Single carriageway of A24 would need to be enhanced. Relief road would have to be completed before any dwellings are occupied.
- Insufficient infrastructure at Kingsfold. Development would cause an unacceptable strain on the infrastructure of Horsham Town.
- Kingsfold currently does not have a railway station. Only transport links would be road and bus creating increase in traffic and pollution.

Statutory Consultees

Natural England made general comments on how sites should be assessed. Specific comments on Land at Kingsfold set out that the site lies adjacent to areas of ancient woodland, which is identified in the NPPF as an irreplaceable habitat (para 175). They expect policy provisions to safeguard this habitat, should this site be taken forward, and also note that promoters have indicated road upgrades to the A24 would lead to the loss of some ancient woodland, which Natural England would not support.

Land at Rookwood

| Support – Land at Rookwood, Horsham | |
|--|-----------|
| Number of Comments | 22 |
| Summary of Comments | |
| <p><u>Members of the Public and community groups</u></p> <p>There were relatively few supportive comments from members of the public. Comments of this nature did include however the following:</p> <ul style="list-style-type: none"> - As an urban extension to Horsham it would be preferable to standalone new settlements such as Land North East of Henfield (Mayfield) or Land at Buck Barn (Weald Cross) - It was sustainable and located close to education and employment opportunities, as well as existing facilities - It has good access to a railway station and the road network; and has good walking/cycling and public transport links - Development in the northern part of the district is preferable to the south and would have less impact on climate change - Golf participation is declining and members could obtain membership of other clubs - Development would have a low landscape/character impact. - That the proposal offers a good number of larger houses - There was strong prospect of delivery - There is a low risk of flooding. <p>A number of those who were supportive of development at the site, indicated that their support was contingent on infrastructure, quality housing, recreational space, etc. being provided.</p> <p><u>Parish Council</u></p> <p>Bramber Parish Council stated that the site was “potentially a good fit with Horsham and the surrounding environs” but that development would have a likely major impact on wildlife access to the Warnham Local Nature Reserve. As such, it was expressed that development of the southern portion of the site would have a significantly less environmental impact.</p> <p><u>Site Promoter</u></p> <p>A representation was made on behalf of Horsham District Council as a landowner of the site.</p> | |

The representation was supportive of an allocation on this site and included a vision document suggesting that it could that development on the site could deliver about 1,110 homes – split on almost a 50:50 basis between 1 and 2 bed apartments and 2-5 bed homes for a range of prospective residents, along with a primary school (if needed) and retail facilities. The document emphasised the desire for good design, being sensitive to the location and nature of the site.

Despite supporting development on the site, the site promoter recommended that the assessments of the site against most of the criteria used in the assessment should be altered and viewed more favourably. This included that in their view the development would:

- have a favourable landscape impact (rather than a neutral impact), citing that their landscape study is at a more fine grain than the HDC Landscape Capacity Study
- have a favourable biodiversity impact (rather than a neutral impact), citing ecological studies undertaken and design of the site to lessen impacts and enhance habitat.
- have a neutral environmental impact (rather than an unfavourable impact), also relying on further studies to justify this view and indicating that mitigation could reduce impacts.
- score favourably (rather than neutrally), stating that development could help to reduce flood risk in the area.
- have a favourable impact on the climate, etc. criterion (rather than neutral), identifying that the landowner will be ambitious to ensure that development would minimise its effect on climate change.
- have a very positive impact on the housing criteria (rather than positive), identifying that the quantum, mix, size and tenure would provide suitable options for a range of residents and help to meet housing targets.
- have a very positive impact in education terms (rather than positive), as it would deliver a primary school and nursery and generate CIL for secondary provision.
- score favourably against the leisure, etc. criterion, because it could deliver a community facility and open up the site, although the loss of golf course was acknowledged.
- score very positively against the transport criterion (rather than favourable), as it was located next to the most sustainable town, would have facilities close by and would improve public transport services, with it being noted that census data identified a relatively low proportion of people travelling to work by car in the area.

Observation – Land at Rookwood, Horsham

Number of Comments

21

Summary of Comments

Members of the Public and community groups

A number of comments were made in relation to the site without expressing support or objections. These included the following:

- That allowing high housing densities would make the best use of the land.
- That whether the site was developed or not, the Riverside Walk should be protected and that the bridleways including the subway under the A24 to Robin Hood Lane should be retained.
- As the site is publicly owned, it has the potential to deliver affordable housing at a higher rate than policy targets
- A few comments queried the whether the eastern boundary of the site was proposed to be the Red River or the Boldings Brook as it was noted that the map in the draft Local Plan differed from information boards on the Riverside Walk.

- Should development go ahead a wide band of trees should be planted between the new development and the Nature Reserve.

Concern was expressed about the neutrality of officers assessing the site when it was in the ownership of the Council.

Another comment queried why if the site were to be developed, it should not deliver a job per dwelling as per the other strategic sites.

Statutory Consultees

Surrey County Council identified that development of the site could impact on Surrey and that it would be important to identify what provision would be made for non-motorised users to the site and how this may affect trips in and out of Surrey.

Network Rail commented that “Considering the location of this this site and the road network, connections to the proposed North Horsham station should be encouraged to avoid additional pressure on Horsham station. The service to Warnham station is only 1 train per hour, with relatively slow services to London and North Horsham would be an attractive alternative.”

Southern Water explained that their underground infrastructure crosses the site and this would need to be taken into account and that easements would be required. It was also explained that the capacity of local sewerage treatment works would need to be considered and that funding for any work would take time to investigate and implement.

Highways England stated that the site “is likely to have a cumulative impact at [the] M23 in association with committed North Horsham development.”

West Sussex County Council suggested that reference in the site suitability summary could be given to the fact that land includes the location of the 18th century Warnham Place (demolished in 1797) and prehistoric finds.

The Environment Agency noted that the site includes Boldings Brook and is adjacent to Warnham Mill Pond. They advised that any development should consider flood risk, water quality and biodiversity. It was also advised that development should be outside of reservoir flood extents in case of reservoir failure.

| Object – Land at Rookwood, Horsham | |
|--|------------|
| Number of Comments | 480 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| The Friends of Warnham Local Nature Reserve objected on multiple grounds to the proposed allocation. The grounds included the following: | |
| <ul style="list-style-type: none"> - The Nature Reserve and Rookwood was purchased for public use and developing it would represent a breaking of trust with the public - It is a significant wildlife site and, in accordance with planning policy, should be protected. - A large number of local people, evidenced by a petition, oppose development on the site. - The proposal is not ‘sound’ in terms of the NPPF nor consistent with HDC’s own policies and strategies. - It is not consistent with the aims of the Wilder Horsham District Partnership between HDC and the Sussex Wildlife Trust. | |

- Other alternatives for the land had not been considered such as the restoration of the northern part of the site as a Nature Reserve and transforming the southern part of the site into a country park for amenity and leisure purposes. Such alternatives would align with the HDC Corporate Plan but the development of the site would not.
- Wildlife corridors would be destroyed and many species affected.
- The proposal would cause and increase pollution (noise, water, light).
- Scepticism that development could deliver a 10% increase in biodiversity.
- Concern was expressed that the site promoters sought to develop most of the housing provision on the northern part of the site, with the opposite preferred by them.
- Internal access could not be achieved without destroying parts of the Walnut Tree Plantation.
- There would be a reduction in visitors to the area, including to the Discovery Hub that was recently successful in acquiring grant funding to increase visitor numbers.
- Damage to the natural environment would be caused by many factors (litter, domestic animal disturbance, anti-social behaviour and damage by vehicles) and that mitigation, by building a fence would ruin the character.
- Flood risk, already present on the site, would be increased and cumulative impacts of flooding and climate change have not been taken into account
- There is the potential of being contaminated soil on the site and the release of this material by development could be harmful.

It was further mentioned that there was a lack of public information provided by the developers which “has significantly impeded our ability to challenge the conclusions drawn” about the development.

A number of those who commented indicated that they supported or endorsed the response by Friends of Warnham Local Nature Reserve and a number of those who commented repeated some or all of the above points.

In addition to the points above, other reasons for objecting were put forward. These have been summarised and organised into the following themes below:

Loss of golf course

- The golf club is an important recreational facility appreciated by those who use it and it should be managed better rather than lost to development
- The golf course is an important environmental resource and assertions to the contrary are unproven
- It has not been determined that there is no need for the golf course/that it is not viable
- There has been a loss of other golfing facilities nearby.
- The golf course provides pay and play and pitch and putt facilities which do not exist nearby.
- Increase in population will revive demand for golf course
- If lost, the golf course should be rewilded.
- The golf course has facilities to host weddings and events and this would be lost, damaging the local economy.

Environmental impact

- Warnham Local Nature Reserve would be impacted by development by causing loss of habitat and species (bats, birds, deer, woodland, watercourses, etc.)
- Lots of important species, with records of their existence including numerous red listed bird species that would be badly affected.

- Would increase exposure to poor air quality, particularly to children if a school were built close to major roads.
- If development were to occur, wildlife corridors would need to be created to link the Nature Reserve with the surrounding area – maintained to include ponds/3rd green and 4th tee
- A road down the side of the Walnut Plantation would isolate it from the rest of the Nature Reserve
- Development of the site would lead to a loss of Horsham's 'green lung'
- Tree planting is a national priority and tree removal does not accord with this.
- Development would isolate Warnham Nature Reserve and the Walnut Plantation, causing impacts on species.
- The market town character of Horsham would be negatively impacted by dense development and changing the surroundings.
- Would stress finite water supply system
- The site helps maintain a strategic gap between Horsham and Broadbridge Heath
- Other open spaces have been lost to development near by North Horsham, Broadbridge Heath, etc.
- It should be considered for Local Green Space designation
- Nature Reserve is a tourist attraction and development will be damaging to the local economy.
- Vehicle charging points are not enough to improve environmental credentials of the site.

Principle of development

- The size of development is too large and too dense – a smaller amount of development may be more acceptable.
- It's unlikely that affordable housing proportions will be met.
- Government drive to rebalance the economy northwards does not equate to developing Horsham
- Need for housing in northern part of the district is predicated on growth at Gatwick, which will be limited due to increases in aviation tax and reduced demand following coronavirus.
- Land should be allocated for the gypsy and traveller population in common with other strategic sites.
- New settlements would be preferable to additions to existing settlements such as this.
- 5 storey buildings would be an eyesore.
- Houses won't sell due to competition with other developments nearby
- Development won't meet the needs of locals but people from the wider area.
- Development of other sites would be preferable
- The cycle network won't be improved and access is not proven.
- Four and five bedroom houses are not needed
- Horsham has overachieved against its housing targets and therefore development should be slowed down/not promoted.

Flooding

- Part of the site already floods and development would exacerbate the problem – Remedial works at Warnham Mill Pond were unable to reduce recent flood events.
- Development would increase water run off to Bolding's Brook and therefore more flooding on the Reserve and further downstream.
- Surrounding area identified by Environment Agency to be at high risk of flash flooding.
- The river is not maintained to manage increased flooding from the development – dredging, etc.
- Owners of the new houses would not be able to get insured due to flood risk.

Impact on community

- Nearby house prices will be affected
- The Riverside Walk would be impacted and this is a well used public resource
- Would lead to a loss of public amenity for residents, not just golfers – such as those who exercise or walk their dog through the area.
- Development would add to congestion on nearby streets as well as the A24
- Construction impacts (noise, dust, etc.) would have negative impacts for a long period of time.
- Would cause rat running in neighbouring parishes and adjacent parts of Horsham
- The provision of a gym would not adequately replace facilities that would be lost.
- Existing local infrastructure is stretched and not enough would be provided by the development (health, education, roads, etc.)
- The loss of recreation would negatively impact mental health and wellbeing
- Removal of open space would increase deprivation and impact on need of ageing population and people with disabilities.
- Population growth requires increases in open space as well as increased amount of housing and Horsham has low levels of public open space.
- Development would cause animals to graze at nearby allotments, undermining work done by allotment holders.
- Other open spaces are already overused and the loss of open space on site would put more pressure on those spaces.
- A lack of jobs/employment opportunities for new residents.
- The town centre and other services (i.e. railway station) are not easily accessible and people will use cars.

Other

- Development of the site would be in contradiction to the Plan's vision and a number of its objectives, in addition to a number of proposed Local Plan and national policies.
- A lack of belief that the development would deliver stated objectives such as those related to affordable housing, biodiversity net gain, etc.
- It is not clear why development on this site, which was ruled inappropriate in the 1990s is now acceptable.
- No information to base 'neutral' or 'positive' RAG ratings/ the assessment of the site is overly positive – particularly those relating to environmental matters
- It goes against the aims of the Draft Horsham Blueprint Neighbourhood Plan.
- Council needs to be firm on what is to be delivered – use of 'could' and 'may' is unclear.

A number of responses suggested that if the site was to be developed and the golf course closed, the northern part of the site should be given over to nature conservation with some development on the southern part of the site.

A number of respondents referenced a public meeting held by the District Council (as the Landowner) at Roffey Millennium Hall in relation to the proposed development and did not agree with statements made, such as those regarding biodiversity net gain.

Responses that mentioned that the open space on the site was a particularly important resource in the Coronavirus pandemic as it allowed exercise whilst social distancing were common.

A number of comments identified the existence of a petition and the number of signatures against development on the site.

Parish/Neighbourhood Councils

Horsham Trafalgar Neighbourhood Council expressed concern that urban extensions, such as Rookwood, would put pressure on services and facilities where deficits exist and that development at Rookwood would lead to the loss of a golf course that benefits not only golfers but provides an amenity space for residents.

Scepticism was also expressed in how development of the site could improve biodiversity, protect the natural and historic environment, use natural resources prudently and help with minimising and adapting to climate change. In particular it was felt that development would threaten Warnham Local Nature Reserve for multiple reasons – such as light pollution, cat predation and landscape disorientation. Exacerbating flood risk was another concern identified, with evidence of recent flood events presented. It was expressed that the potential allocation was inconsistent with some of the plan's objectives and policies.

Horsham Forest Neighbourhood Council objected on multiple grounds, including:

- The site is outside Horsham's built up area
- One of the best public golf courses would be lost
- The size and density would strain existing infrastructure
- It would have a negative impact on Warnham Nature Reserve and the golf course provides a wildlife corridor between the Nature Reserve and the wider countryside which would be lost
- It would increase flooding impacts, where flooding is already known to exist
- It would impact upon traffic and have a very dangerous access and nearby station parking is already full.

Horsham Denne Neighbourhood Council made the following comments on the site:

- The description should state that the whole site is 68ha not 39ha and it should be identified that the western edge of the site is the A24 not Boldings Brook.
- The site was viewed as not currently available in December 2018
- It would strain existing infrastructure and minimal new infrastructure is offered
- It would be preferable to allocated development for self-sufficient locations
- Part of the site is at risk of flooding
- It is outside the built up area
- Affordable housing on a public site does not outweigh impact on existing residents
- The site acts as a green lung, preventing coalescence and providing leisure activities
- The Riverside Walk should be protected
- The golf course is an excellent facility, also winning awards for conservation and environmental management and should not be lost
- Other golf courses in the surrounding areas have already been lost to housing and other uses.
- Development would impact on biodiversity and that biodiversity gains would not be possible if developed
- Having a single access would not be satisfactory and would bring safety concerns, and parking at nearby stations is already insufficient.

Broadbridge Heath Parish Council objected to the proposed allocation on multiple grounds:

- Impact on Nature Reserve
- Loss of green space
- Impact on golfers and other users
- Flood risk

- Proximity to the A24 and related noise and pollution impacts.

Rusper Parish Council objected to the proposed allocation on multiple grounds including:

- It would increase traffic in the area and the road network is not capable of supporting it, and would increase rat-running through Rusper Parish
- That the impact on biodiversity was stronger than assessed as developing a green field and isolating a Nature Reserve would cause harm
- There is inadequate education provision as there was no indication that extra provision would be delivered.

Colgate Parish Council expressed concern that development on the site “would have a negative impact on the area including the Reserve in Warnham”.

Land West of Southwater

| Support - West of Southwater | |
|---|----|
| Number of Comments | 19 |
| <p>Summary of Comments</p> <p><u>Members of the Public</u></p> <p>The supportive respondents in general preferred expanding existing settlements over new settlements in the countryside. Other reasons put forward included:</p> <ul style="list-style-type: none"> - It would have a lesser landscape impact than other options/would have limited impact on rural character. - It has existing road links and nearby access to Christ’s Hospital railway station. - Would avoid ribbon development. - Is coherent with the rest of Southwater. - Benefits from pedestrian and cycle access to services and facilities in Southwater. <p>Some expressions of support come with caveats as follows:</p> <ul style="list-style-type: none"> - The site must provide locally affordable housing; - Development must increase infrastructure, public transport, green travel and green spaces on site; - Allocation should take care to preserve ancient woodland; - It was necessary to study the impact of extra traffic on the A24 north of the site, in particular the single carriageway section between Great Daux Roundabout and Capel. <p><u>Site Promoter</u></p> <p>The site promoter submitted a response in support of the allocation of their site. Comments included that:</p> <ul style="list-style-type: none"> - A strategic allocation to the west of Southwater is highly sustainable as Southwater is one of the largest and most sustainable settlements in the district, offering a wide range of services, employment and good public transport and road links. - Housing development in this location would be ideally placed to meet both the district’s own housing needs and the unmet needs of Crawley. - The provision of 15 acres of employment land would support the economy of the Gatwick Diamond, delivering one job for each new home. - The site is relatively unconstrained and ancient woodland can be protected. - The site would provide open spaces and ensure 10% biodiversity net gain. - The development can provide significant community and transport infrastructure including new link roads to Hop Oast and Two Mile Ash Road, improved sustainable transport links | |

to Christ's Hospital Station as well as an additional 100 parking spaces on land close to the station, full signalisation of the Hop Oast junction, and an improved pedestrian crossing of the A24.

- A new local centre to complement Lintot Square, community building providing a facility for use by local groups including the Horsham Scouts would be provided.
- The site can also deliver an all through school with primary and secondary education and SEND facilities, in the County Council's favoured location for such a school. This would benefit new and existing residents and could come forward quickly.
- The site is in single control and the developer is already building out an adjoining development, including facilities that would benefit the proposed allocation. Experience in the district to date shows that the site would be fully deliverable in the plan period.

Despite supportive comments, the site promoters considered that though the site compares favourably to other sites, the site assessment was not as positive on aspects such as economy, biodiversity and education then it could have been.

Other Developers

Two other site promoters supported the allocation of the site in the context that neighbouring sites that they wished to develop would also be appropriate to allocate.

Observation - West of Southwater

Number of Comments

14

Summary of Comments

Members of the Public and community groups

Comments expressing neither support nor objection were limited but included:

- Questions about whether Smith's Copse Ancient Woodland would be developed
- There would be a need for additional scouting facilities to accommodate needs generated by development.

Parish Councils

Henfield Parish Council expressed a neutral view on the site, representing neither an objection nor a support.

Horsham Trafalgar Neighbourhood Council commented that urban extension proposals such as at Southwater, run the risk of putting greater pressure on services and facilities where there is already an infrastructure deficit.

Statutory Consultees

Network Rail commented that alignment of the former Christ's Hospital to Shoreham railway line should be protected and that bus and cycle links should be provided to Horsham station as existing car park is at capacity.

Southern Water commented that:

- proposals for 1200 dwellings at this site will need reinforcement of the wastewater network to provide additional capacity. This reinforcement will be provided through the new infrastructure charge to developers.
- Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding.

- Their underground infrastructure crosses this site and needs to be taken into account when designing the site layout. Easements would be required, which may affect the site layout or require diversion.
- The capacity of the local sewerage treatment works needs to be considered in the master planning of this site. Funding for the work would be through the 5 yearly business planning process rather than developer funded and as such it would take time to investigate and implement options for new or increased capacity.

Highways England stated they do not necessarily agree with the Council's assessment of the transport impacts of the Strategic Sites listed in the Plan. However, this position is purely based upon consideration of the potential impacts of the proposals either individually or cumulatively on Highways England's network. Southwater is likely to add to the cumulative impacts of the overall plan.

Object - West of Southwater

Number of Comments

61

Summary of Comments

Members of the Public and Community Groups

Comments that objected to the allocation of the site were varied and covered numerous issues, including:

- There has been a lot of development in the area already and not enough time for the community to adjust.
- Development should be restricted to that set out in the Neighbourhood Plan.
- Risk of harm to the setting of listed buildings and to Christ's Hospital.
- There is insufficient existing infrastructure (roads, education, health, etc.) and the development of the site would exacerbate problems.
- The development would contribute to the causes of climate change.
- New settlements would be preferable to urban extensions.
- Homes would be unaffordable to local people and/or would not sell as evidenced by other recent developments.
- Delivery of the quantum of homes sought would go beyond providing for local needs.
- Previous assessments stated that the site was not suitable and/or the current site assessment or sustainability appraisal is too positive or does not identify important impacts.
- Will impact on the character and rural nature of Southwater and aid the coalescence with Horsham.
- No land has been allocated for gypsy and traveller provision.
- There are few local employment opportunities and development would encourage commuting.
- Development would be detrimental to local rural/agricultural businesses.
- The employment element of the scheme is unlikely to be delivered.
- Negative impacts on existing residents.
- No explanation about alternative energy sources mentioned.
- Development would increase the risk of flooding and strain on sewers.

Environmental issues were also commonly cited as reasons for objection. These included the following reasons:

- Too intrusive into the countryside;
- Destruction of countryside / rural landscape views /wildlife habitats;
- Loss of green space;
- Loss of ancient woodland;

- Risk to Courtland Wood Local Wildlife Site;
- Risk to Knepp Castle rewilding project;
- Increase in air and light pollution;
- Doubts that 10% biodiversity net gain could be achieved; and
- Loss of arable land for farming / food production.

Parish/Neighbourhood Councils

Southwater Parish Council made clear that they felt that potential housing targets in Southwater, including strategic development such as what this proposal would represent would be excessive, noting that there is already development committed and under way and that this would strain current infrastructure. They expressed that the level of development proposed would therefore not be sustainable and that having high targets would mean that the Council would be under pressure from developers if such targets were not achieved.

A number of other Parish Councils objected. This included for the following reasons:

- There has already been substantial development in the area.
- The environmental proposals appear to be lacking.
- Urban extensions (such as this proposal) risk putting greater pressure on services and facilities where there is already an infrastructure deficit.

Other Developers/Site Promoters

Other developers/site promoters objected to the potential allocation of the site, generally in the context of suggesting that the site that they were promoting was preferable.

Policy 15

| Support – Policy 15 | |
|---|----|
| Number of Comments | 16 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u> Comments included:</p> <ul style="list-style-type: none"> - Support reference to zero carbon - Support reference to new infrastructure - Agree that new development should be sustainable and sustainably located. - Agree that development should not be fossil fuel reliant - Employment and facilities are necessary to be delivered in new sites. <p><u>Parish Council</u> Rudgwick Parish Council supported principle 4 of the policy.</p> <p><u>Site Promoter</u> A site promoter explained that the policy was a sound basis upon which to develop strategic sites.</p> <p><u>Statutory Consultees</u> The Environment Agency supported requirements for landscape led schemes, masterplanning and the delivery of infrastructure.</p> | |

| Observation – Policy 15 | |
|--|----|
| Number of Comments | 31 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u> Comments included:</p> <ul style="list-style-type: none"> - While the policy is agreeable, the assessed sites may not meet the clauses - While the infrastructure clause is supported, infrastructure is needed at the start of the development rather than lagging behind. - The principles need to be enforced and developers deliver on them. <p><u>Parish Councils</u> While generally agreeing with the policy, Horsham Trafalgar Neighbourhood Council were of the view that the policy should be tightened with the word 'expected' replaced by 'required' they also were of the view that developers should seek to exceed the standards identified.</p> <p><u>Site Promoter</u> A number of site promoters identified that their sites accorded with the principles of the policy.</p> <p>It was recommended that it was necessary to set out how the 10% net gain would be calculated with one site promoter recommending the Natural England Biodiversity Metric. The same promoter mentioned that, in relation to clause 4, gypsy and traveller provision should be assessed on a site by site basis and that clause 6 should be added to reference that the one job per home requirement can be met within close proximity to the site and accessible to sustainable modes of transport.</p> | |

A site promoter felt that the document was not clear that the policy applied to only strategic sites.

In relation to clause 4, a site promoter stated that self build housing/custom build housing are not appropriate types in strategic sites as they are not individual projects, not part of business plans and not something that should be enforced on major sites. In relation to clause 8, the same promoter indicated that the creation of defensible boundaries by new landscape buffers is short sighted as there may need to be growth in these areas in the long term.

Statutory Consultees

Gatwick Airport Limited, while generally supporting the policy, wanted the supporting text added to ensure that it was clear that other policies in the plan would have to be satisfied by the strategic sites.

Crawley Borough Council identified general support for the policy and its clauses but made the following comments:

- In reference to clause 5, they suggested that where development is adjacent to neighbouring authority that it should also provide infrastructure to meet their unmet infrastructure needs.
- In reference to clause 4, they suggested that there may be merit in setting out how supply/demand of self-build/custom housebuilding plots would be managed and that densities should not be at very low densities and that land should be effectively used, helping secure viability of infrastructure and services.

Highways England were generally supportive of the policy but made the point that no development should have a residual impact on the strategic road network and should ensure that the network is no worse off that would have otherwise been without the development.

Historic England asked how the policy encourages reuse of historic buildings and how might new development be integrated into historic areas?

Other Consultees

Sussex Wildlife Trust generally supported the policy but suggested that the final sentence of clause 2 should be altered to read "It is expected that the proposed development will **avoid impacts on biodiversity through good design**, responding to and complementing existing features, and that any SuDs features will be incorporated into the provision of biodiversity gain and wider green infrastructure provision." (changes highlighted in bold)

Object – Policy 15

Number of Comments

65

Summary of Comments

Members of the Public and community groups

Comments included:

- The infrastructure clause should be more detailed and specific
- Clause 2 needs to mention retention of ancient hedgerows/woodland
- Clause 8 should read 'logical' rather than 'legible'
- 'High-quality mixed-use communities' in clause 4 needs to be explained
- All parking spaces should have EV charging points.
- Each site should provide retirement and care homes.
- Proximity to railway stations should be included.

- Equestrian movements (including bridleways) should be included in new development, where appropriate, and referred to in clause 8.
- There is no reference to brownfield sites
- There should be reference to how sites function during the construction.
- The principles do not take into account commitment to achieve zero carbon by 2050.
- Combined heat and power is not zero carbon.
- There is no mention of the issue of flooding.
- It is not possible to ensure that employees of new jobs live locally.
- The requirements should be made tougher – use of language such as “must comply” rather than “expected”
- Biodiversity net gain should be delivered on site and local experts involved to assess such claims and in general, environmental requirements increased.
- Lots of large sites dropped into the district will affect community integration.

Parish Council

Bramber Parish Council expressed that SuDS is not always suitable on clay and instead connections should be made to storm drains/combined sewers.

Thakeham Parish Council mentioned that the policy should cross reference other chapters and policies (Chapters 9 and 10 and Policy 18).

Rusper Parish Council noted that access to public transport should be in the clauses and that all units should include solar energy capture specifically. On point 4 they suggested amended the start of the sentence to read “Deliver high-quality mixed-use communities that provide a range of housing types and tenures, with an emphasis on high density single and low occupancy units”.

Colgate Parish Council expressed that cumulative impacts of development should be included within the policy.

Shermanbury Parish Council were of the view that the principles should reference flooding, ground water drainage and impact of climate change.

Nuthurst Parish Council suggested a criterion that sites must be in sustainable locations and not as a community/new town in open countryside remote from employment, infrastructure and facilities.

Shipley Parish Council expressed concern that the principles were not sufficient in dealing with entirely new settlements.

Site Promoter

One promoter suggested the policy was too crude and a one-size fits all policy was not suitable and that site specific criteria was necessary.

Statutory Consultees

Natural England identified concerns and that the principles should be strengthened. Comments included:

- Impact on natural capital and ecosystem services, evaluation of their loss/impacts through development, deliverability of necessary mitigation and enhancements to achieve overall net environmental gains (biodiversity, air quality, water quality and quantity, carbon storage and flood risk) should be assessed

- Priority habitats affected by development proposals should be assessed
- Green Infrastructure provision on-site and connections should be a standalone principle given benefits and links to NRN and net gain
- Climate change must be a key principle and should include more than zero carbon e.g. water use, water neutrality.
- Landscape principle must be strengthened and is a critical factor in determining quantum of housing. LVIA's should be undertaken.
- Strategic site assessments must establish the baseline in terms of existing biodiversity, the impacts and how net gains achieved. Site selection for biodiversity should follow the requirements of the mitigation hierarchy (avoid impact, mitigate, compensate as last resort). Net gain is in addition to this. 10% biodiversity net gain is the minimum requirement and the Council could be more ambitious. The LNP's Natural Capital Investment Strategy should form part of evidence base.
- Assessment on impact on functionally linked habitats should include that for The Mens SAC and Ebernoe Common SAC. Furthermore an assessment of impacts to the Arun Valley SPA SAC and Ramsar site will also be required.
- Integrated landscape-scale assessment of impact is essential to accurately apprise the impact of development and to ensure mitigation is both achievable and will be fit for purpose.

Other Consultees

The Woodland Trust recommended the addition of a new clause that sites would be expected to have a tree canopy coverage of 30 percent.

Policy 16

| Support – Policy 16 Affordable Housing | |
|---|-----------|
| Number of Comments | 23 |
| Summary of Comments | |
| <u>Members of the Public, Parish Councils & community groups</u> | |
| Comments included: | |
| <ul style="list-style-type: none"> - General support for increasing requirement to 50%; also 40% was proposed - Majority of properties should be 1 and 2 bedroom homes - Community Land Trusts should be used as widely as possible - Affordable housing for rent must be provided in villages as well as towns - Support for at least 70% of homes being for rent - Support for adopting a 10 dwelling threshold from which affordable housing would be required; also 8 dwellings was proposed - Build modern apartments at higher densities, which can be more affordable - Aims of the policy are excellent, but question achievability - The local plan should address the watering down in national policy of what is affordable | |
| <u>Statutory Consultees</u> | |
| Crawley Borough Council explained that they have requested that Horsham assists Crawley in meeting its significant shortfall in affordable housing supply. Specifically, it is suggested that 72 affordable dwellings per annum should be supplied in Horsham that are accessible to Crawley residents to rent or buy. They also explained that it would be expected that affordable dwellings provided in extensions to Crawley would be available for Crawley nomination rights. | |
| <u>Developers and landowners</u> | |
| Comments included: | |
| <ul style="list-style-type: none"> - 70% of affordable housing for affordable rent is considered too high in respect of creating balanced and sustainable communities; a 50/50 split is more viable and sustainable - Affordable housing provision supported in principle, but 50% requirement could impact on the level of infrastructure that could be delivered for the wider community | |

| Observation – Policy 16 Affordable Housing | |
|---|-----------|
| Number of Comments | 44 |
| Summary of Comments | |
| <u>Members of the Public, Parish Councils & community groups</u> | |
| Comments included: | |
| <ul style="list-style-type: none"> - Provision for employment opportunities needs to be factored into policy - Real tests of affordability are median income and proportion of income spent on housing - Affordable housing levels should be 50% or higher than is quoted in policy / more rented provision - Support 35% affordable housing but this must be stuck to - Reduce quotas for affordable housing on brownfield sites - Affordable housing should be provided at an early phase of development - Smaller properties are needed for young people and small families | |

- Developers should not be able to reduce affordable housing by claiming lack of viability
- Part of problem is sale of existing council housing; major social housing build programme is needed
- Government sponsored schemes should be actively promoted by HDC
- All housing should be sold freehold due to potential for abuse of leasehold arrangements
- More housing for first time buyers should be available
- Restrict buy-to-lets as this pushes up house prices
- Must introduce legal penalties for not meeting the 35% requirement
- More 1- 2- and 3-bedroom properties needed
- Most affordable housing is occupied by people from outside the local area
- Affordable housing must be built on-site
- There should be a lower threshold for seeking financial contributions towards affordable housing in designated rural areas, which includes AONBs (i.e. sites of 6-9 dwellings)

Developers and landowners

- Should be greater emphasis on rural exception sites and similar
- Requiring levels of affordable housing greater than 35% would reduce provision of other social infrastructure or put viability at risk
- Homes England has significant expertise in a range of affordable housing tenures and delivery models, and there are opportunities for partnership working
- The LP should not go beyond nationally set threshold(10 units, 1 hectare or 1,000 sqm non-residential floorspace)
- If a 50% affordable housing target is adopted, it is essential that there is flexibility in the policy to allow for a reduction based on viability evidence
- Allowing a greater number of sites in the villages, which are capable of delivering a policy compliant level of affordable housing, is suggested

Object – Policy 16 – Affordable housing

Number of Comments

41

Summary of Comments

Members of the Public and community groups including Parish Councils

A number of individuals raised the following concerns regarding Policy 16:

- Threshold should be higher for affordable housing provision
- A 50% target should be sought
- A range of 35-50% affordable housing may be appropriate
- Should be different targets for different parts of district
- 'Affordable' housing is not affordable
- More social housing / rent controlled housing is needed as other types are still not affordable
- Percentage of affordable housing is too low
- Percentage of affordable housing on Horsham sites has often been below 35%
- Developers must be prevented from only delivering affordable housing at the end of the scheme
- Smaller affordable homes should be required (2 bedroom)
- Lack of clarity regarding target and thresholds in the Regulation 18 document is unhelpful
- There should be more facilitation of self-build and custom-build homes
- Low cost homes for essential workers

- Policy should include consideration of different types of housing, including for older people, as '1 size fits all' not appropriate
- Many specialist needs have not been considered e.g. custom and self-build, care homes / dementia care, park homes
- A large proportion of new homes should be for first time buyers
- Concern that viability assessment allows developers to build fewer affordable homes for local needs
- 20% below market rent is not cheap enough to be affordable
- Would welcome a policy that allows small sites to come forward with affordable housing, within settlement boundaries

Developers and landowners

- 50% affordable housing would be challenging to achieve – no track record of delivering this; viability concerns
- The 35% target should be maintained
- HDC should be aware of new First Homes Government policy
- Definition of affordable home ownership has changed with publication of new NPPF, with Rent to Buy now included. Amendments to policy wording proposed
- Policy should better reflect the definition of affordable housing set out in Annex 2 Glossary of the NPPF which includes starter homes, discounted market sales housing and other affordable routes to home ownership
- Policy should refer to 'net increase' in affordable housing
- There is a need to adopt a different approach on affordable housing for specialist older people's housing, due to differences in viability and circumstances
- From a viability perspective, HDC should note the National Planning Guidance requirement to collaborate with the local community and developers
- HDC should look at options for zoning affordable housing across the district
- A higher level of development overall would mean that the level of onsite affordable housing could be commensurately lower
- The SHMA indicates a need for 503 affordable homes per annum which is approx. 36% of the total annual requirement in the district – it is therefore illogical for the target to be greater than 36%
- The site size threshold of 10 or more homes should be complied with

Policy 17

| Support – Policy 17 | |
|--|----|
| Number of Comments | 13 |
| Summary of Comments <u>Members of the Public and community groups</u> Comments included: <ul style="list-style-type: none"> - The delivery of truly affordable housing for local needs is supported. - The policy is supported but it needs to be enforced to ensure developers deliver what is needed and not expensive, large homes. <u>Parish Council</u> Thakeham Parish Council expressed support for the policy, particularly for increase of small units. They queried as to whether it would be useful to reference low-rise flats within the policy as they consider it is often the best mode of delivery. Rudgwick Parish Council commented that more homes of a modest size is supported. <u>Site Promoter</u> Comments included: <ul style="list-style-type: none"> - The reference to different home ownership products in the table is the correct approach. - Flexibility within the policy is supported and unit mix should be dictated by market demand. | |

| Observation – Policy 17 | |
|---|----|
| Number of Comments | 34 |
| Summary of Comments <u>Members of the Public and community groups</u> Comments included: <ul style="list-style-type: none"> - There is an insufficient amount of smaller dwellings - Small apartments and homes are not needed, but bungalows would meet needs for different populations - Current provision does not meet the needs of local young people - Building large houses in remote locations increases car use - Horsham town needs more large houses as there have been a large number of small ones built. - The policy should refer to self-build units and starter homes. - The delivery of smaller units with gardens should be encouraged to encourage downsizing. - Need to ensure needs for disabled and elderly people are met. - Smaller properties get extended by owners, so the supply gets reduced - A greater proportion of flats should be built, which are less expensive and use land more efficiently. - The table is confusing as the rows do not add up to 100% - Policies and site allocations should better recognise the significant need for C2 dementia care home developments to meet needs of parishes, as identified in the SHMA <u>Site Promoter</u> Comment included: | |

- The policy should not control housing mix as flexibility is necessary and up to date information provided on the market should be used/allowed to be used if more up to date than the SHMA.

Statutory Consultees

Crawley Borough Council commented that their standards differed slightly but were based upon a shared SHMA and would welcome discussions on this point.

Object – Policy 17

Number of Comments

17

Summary of Comments

Members of the Public and community groups

Comments included:

- The percentages used in the table appear to be designed to encourage buyers from London rather than meet the needs of locals.
- The policy does not reference self and custom-build housing even though it is referenced within the supporting text.
- The Council should ensure that new housing is occupied by first-time buyers/permanent residents rather than allowing buy-to-let purchasers to own new development.
- There is no identification of the need for bungalows to meet local needs.
- The policy encourages 25% of homes to be 4 bedrooms which is inconsistent with evidence and aims of the Local Plan
- The affordable requirement is too high and would encourage people to come from outside of Horsham for housing. There should be an increase for 4 bed properties and an allowance for 5 bed (for sale) housing.
- The delivery of strategic development would not meet local housing needs but the needs of a wider community.

Parish Council

Rusper Parish Council were of the view that statistics show that there show be a greater skew in preference of smaller units than indicated in the policy – particularly in lower density areas.

Rudgwick Parish Council commented that there was a lack of detail in the table of the policy and that it would be sensible to decrease the amount of large houses in favour of small, expressing that there was difficulty in selling large houses. They also explained that the policy doesn't meet the needs of those downsizing into bungalows.

Bramber Parish Council noted that reference to older people's housing was omitted in this policy

Site Promoter

Comment included:

- The second criterion is unnecessary as neighbourhood plans must be in conformity with Local Plans.
- The policy should specify the requirement for older persons housing.
- The policy does not consider Neighbourhood Plan sites that do not accord with the policy's requirements and this needs to be clear.
- Should the Council agree to meet the needs of neighbouring authorities, then it would be logical for the proportions to reflect that in other authorities (i.e. Crawley)
- 10% of affordable units as 4 bed properties is too high as it is difficult for the larger dwellings to meet the affordable criteria.

Policy 18

| | |
|--|-----------|
| Support – Policy 18 | |
| Number of Comments | 10 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>A number of individuals raised the following comments in support of Policy 18:</p> <ul style="list-style-type: none"> - A policy on minimum space standards is long overdue and welcomed and no changes recommended - Very positive to see these issues addressed specifically, although internal walls in many modern homes are not robust enough to secure certain mobility aids e.g. stair/grab rails. - Where internal space standards fall below the Government guidelines, the policy should be adapted to require developers to declare this and for buyers to sign a document confirming their acknowledgement - Developers should be heavily penalised if they try to circumvent standards <p>Rudgwick Preservation Society agreed that provision for the elderly is vital, but there does seem to be wriggle room on financial viability grounds.</p> | |
| <u>Parish Council</u> | |
| <p>Forest Neighbourhood Council welcomed the adoption of minimum space standards. They also stated:</p> <ul style="list-style-type: none"> - Homes should be specified to high quality standards with regard to insulation, fuel economy, internal space standards and garden space. - the Council should explore the possibility of requiring all new dwellings to be to M4(3)Wheelchair User standards as it is more difficult to adapt a building once built as an equivalent off-site contribution would not provide the wheelchair access where it is needed. <p>Thakeham Parish Council stated support for the adoption of Optional Standards for Accessible and Adaptable Dwellings.</p> | |
| <u>Statutory Consultees</u> | |
| <p>Crawley Borough Council supported the Council introducing the nationally described space standard and requiring new dwellings to meet Building Regulations Approved Document M, reflecting the evidence from the jointly commissioned SHMA.</p> | |
| <u>Site Promoters</u> | |
| <p>Our Place, site promoters for Land at Adversane, supported the proposed housing standards and stated that their scheme's Design Code will ensure these standards are met throughout the development.</p> | |

| | |
|--------------------------------|-----------|
| Observation – Policy 18 | |
| Number of Comments | 12 |
| Summary of Comments | |

Members of the Public and community groups

The following comments were made on Policy 18:

- Older style properties have more generous room sizes and better storage
- New developments need to take into account how we live at different stages of our lives

Horsham District Cycling Forum considers that an additional criterion should be added to the space standards to including space for parking of both bikes and mobility scooters.

Horsham Society suggests that all dwellings must have adaptability built in for changes in family and requirements. Also suggesting that minimum 15% to be specifically adaptable for older people to use in later life including minimum 5% to be retirement and care homes (based on 21% population aged over 65 from HDC population figures). Horsham Society also consider that the specialist needs of the older generation should be a policy, not a vague aspiration and this should be in Policy 18.

Site Promoters

Comments included:

- The optional standards within the policy is not supported by evidence of need, viability and therefore the policy may not be justified by meeting NPPF/PPG criteria.
- The cumulative costs of the policy requirements need to be considered.

Object – Policy 18

Number of Comments

8

Summary of Comments

Members of the Public and community groups

A number of individuals raised the following concerns regarding Policy 18:

- Query why the Minimum Space Standards and Accessible Homes Evidence Papers have not been made available
- Paragraphs 6.51 and 6.52 seem to suggest that those with less mobility requiring a wheelchair are different from other needs
- Clarification regarding how many M4(3) homes are needed over the lifetime of the Plan and has this requirement fed into Neighbourhood Plans
- Clarification regarding how many accessible homes are needed and the requirements of such homes in neighbouring authorities
- Query whether criterion 4 will be reviewed once the Accessible Homes Evidence Paper is available
- The requirement for such homes should be reviewed and monitored throughout the life of the Plan
- Consideration should be given to facilitating suitable space for working from home as the Council has not included this provision in new housing developments
- There should be no exceptions – this is a need for the most vulnerable in our community and should be met as a priority
- Existing homes being built in the District appear to be built on very small footprints with a lack of green space

Horsham Society raised the following issues with Policy 18 and the supporting text:

- With reference to paragraph 6.50, unclear why there are 'significant numbers that do not [meet the standards]' and this should be evidence-led.
- Regarding criterion 2, developments that do not meet the standards should be rejected and this should apply to Permitted Development also. Exceptions should also include historic (nationally and locally listed) buildings
- Criterion 4 – remove *“as part of affordable housing requirement”* and add *“for all developments”*. The reference to the Housing Register should also be omitted.
- Criterion 5 – omit reference to *“financially”* and add that exceptions should include historic buildings.

Statutory Consultees

Natural England considered that Policy 18 should be linked to the provision for accessible natural green space (ANGSt) and Green Infrastructure to improve housing standards for people and access to nature.

Site Promoters

Comments included:

- Requirement to application of 100% M4(2) is very restrictive, especially on flatted development. Therefore the requirement should be lower.
- 5% of new dwellings to meet M4(3) should only relate to affordable homes due to cost and should only be required if there is a need.

Policy 19

| | |
|---|----------|
| Support - Policy | |
| Number of Comments | 2 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| Support was expressed for the policy. | |

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|---|----------|
| Observation - Policy 19 | |
| Number of Comments | 1 |
| Summary of Comments | |
| <u>Parish Council</u> | |
| Denne Neighbourhood Council commented that affordable housing in perpetuity on Exception Sites only apply to rural exception sites but thought this should apply to all affordable housing. | |

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|--|----------|
| Policy 19 - Object | |
| Number of Comments | 7 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| Comments included: | |
| <ul style="list-style-type: none"> - Housing schemes should be contributing to the UK's target of being carbon neutral by 2050 - Good design is needed - Homes should be built to a 'Passivhaus' standard. - Policy 19 should be expanded to include schemes which encompass HDC's self and custom build register as it identifies local need which should be met and ensures compliance with Self and Custom Build Act. - Include the following criterion in the policy 'This exception does not avoid the need to meet all other planning policies' | |
| <u>Parish Council</u> | |
| Billingshurst Parish Council objected to the removal of the Park Homes and Residential Caravan Sites policy as stipulated as Policy 19 in the HDPF. | |
| <u>Site Promoter</u> | |
| <ul style="list-style-type: none"> - The Policy on exception site should reflect that set out in Government guidance and not introduce additional measures and limitations to reduce the effectiveness of the 'presumption in favour'. - A change to the policy should be made to read <i>'The Council is supportive of the delivery of CLT involving affordable housing via Community Land Trusts or other appropriate mechanisms including long term landowners with a clear track record of delivery of such</i> | |

housing, to come forward on suitable sites throughout Horsham District subject to meeting the criteria set out above.'

Policy 20

| Policy 20 -Support | |
|---|----|
| Number of Comments | 22 |
| Summary of Comments <u>Members of the Public and community groups</u> Comments in support generally expressed the view that the types of homes are needed in the district and/or in particular settlements. <u>Site Promoter</u> General support was provided by some site promoters who identified the need to cater for an expanding older population. A number related their response to specific schemes that are promoting through the plan/in live planning applications. <u>Statutory Consultees</u> West Sussex County Council supported the delivery of extra care housing in Horsham over C2 residential institutions. Indication was given that such schemes should provide a minimum of 60 homes. They noted an undersupply of extra care accommodation that would support the care needs of residents 24/7. They advised that proposals should be close to centres of population and to local services and that support is given to the provision of housing for those with lifelong disabilities. Crawley BC expressed support for the policy and acknowledged the challenge of securing affordable housing/affordable care in C2 developments. | |

| Policy 20 – Observation | |
|--|----|
| Number of Comments | 11 |
| Summary of Comments <u>Members of the Public and community groups</u> Comments included: <ul style="list-style-type: none"> - The specialist needs of the older people should be a policy and not a vague aspiration. - There should be adaptability built in for older people in new builds, with a minimum of 15% and 5% for retirement homes. - In Policy 20 itself add ‘cycle/mobility scooter’ to the first sentence of Point 1 to read “and where it is accessible by foot, cycle/mobility scooter or public transport to local shops, services, community facilities and the wider public transport network.” - It should be recognised that independent mobility may be retained through cycling and/or mobility scooters - for some people cycling is easier than walking. So appropriate road infrastructure to enable cycling can increase independent mobility in an ageing population. - While the policy is supported there is a lack of target which can be monitored. <u>Site Promoter</u> Comments included: <ul style="list-style-type: none"> - Extra care housing should not automatically be required to provide affordable units. | |

- Accommodation referenced in the policy should be encouraged within allocations and in locations with and adjacent to built up areas.
- A target number should be provided for the accommodation types in the policy.

A number related their response to specific schemes that are promoting through the plan/in live planning applications.

Policy 20 – Objection

Number of Comments

20

Summary of Comments

Members of the Public and community groups

- Accommodation for older people should reflect their needs.
- Accommodation should be in accessible locations near local services.
- Supported or assisted living is not always required but smaller units such as bungalows would allow appropriate downsizing.
- The plan does not meet the needs of the elderly. All new build should be lifetime homes compliant and the issue of climate change should be a forefront of consideration with UK's obligation to be carbon neutral by 2050.
- The emerging local plan does not cater for older people considering they form a significant part of the community and forecasted to increase in numbers over the plan period.

Site Promoter

Comments included:

- There is a need for C2 dementia care accommodation and that site allocations should be reassessed to reflect this
- The policy should be updated to include consideration of specific affordable housing policy for different types of housing to allow for flexibility for older people
- The Local Plan should specify the requirement of housing for older people and plan accordingly to ensure this number is met which will also provide employment and social benefits.
- Part 3 of the policy is inappropriate and ineffective as it requires C3/C2 accommodation to provide affordable units which will make schemes unviable.
- Sites should be allocated to meet the need for the identified types of housing.

A number related their response to specific schemes that are promoting through the plan/in live planning applications.

Policy 21

| | |
|--|----------|
| Policy 21 – Support | |
| Number of Comments | 4 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| General support was given for the policy though one comment also felt that any annexe to rural workers accommodation should be designed so it cannot later be sold off and used as a private dwelling. | |

| | |
|---|----------|
| Policy 21 – Objection | |
| Number of Comments | 2 |
| Summary of Comments | |
| <u>Parish Council</u> | |
| Rudgwick Parish Council asked what ‘more remote’ meant in context of paragraph 6.69, though they supported other elements of the supporting text. | |
| <u>Site Promoter</u> | |
| One site promoter expressed objection to Policy 21 as it would prohibit the delivery of new rural workers accommodation and would not deliver key workers accommodation because of the qualifying criterion. The policy should be amended to facilitate the delivery of key workers accommodation. Criterion 3 to be amended to read: <i>“A new dwelling cannot be provided by redeveloping an existing building on the site or the new dwellings is located in close proximity to other existing buildings or dwellings...”</i> | |

Policy 22

| Support – Policy 22 Replacement Dwellings and House Extensions in the Countryside | |
|---|---|
| Number of Comments | 1 |
| Summary of Comments <u>Members of the Public and community groups</u> General support was given. | |

| Observation – Policy 22 Replacement Dwellings and House Extensions in the Countryside | |
|--|---|
| Number of Comments | 2 |
| Summary of Comments <u>Members of the Public and community groups</u> Comments made included: <ul style="list-style-type: none"> - House extensions in the countryside should be designed so they cannot become independent dwellings over time - Annexes should be designed so they cannot be sold off independently Rudgwick Preservation Society agreed that the height of replacement dwellings was important and that developers should be required to state the height of the previous building and/or neighbouring properties alongside the height of the proposed new building. | |

| Object – Policy 22 Replacement Dwellings and House Extensions in the Countryside | |
|--|---|
| Number of Comments | 2 |
| Summary of Comments <u>Statutory Consultees</u> Natural England stated that the policy should establish the need to assess for any protected species presence within existing or converted buildings. <u>Developer/Site Promoter</u> A comment was made that, in accordance with paragraph 79 of the NPPF, Policy 22 should be amended to include support for the subdivision of existing residential dwellings: <i>“The creation of an additional residential dwellings will be supported if it would comprise the subdivision of an additional residential dwelling.”</i> | |

Policy 23

| Support – Policy 23 Ancillary Accommodation | |
|--|---|
| Number of Comments | 2 |
| Summary of Comments <u>Members of the Public and community groups</u> General support was given and one comment suggested that if an annexe is used for elderly relatives, it should be built to lifetime homes standard. | |

| Observation – Policy 23 Ancillary Accommodation | |
|--|---|
| Number of Comments | 1 |
| Summary of Comments <u>Members of the Public</u> A member of the Public made the following comments regarding Policy 23: <ul style="list-style-type: none"> - Policy should be expanded to provide clarification of what constitutes a ‘genuine need’ in criterion 1 - Further clarification regarding criterion 3 should be provided on what a ‘clear functional link’ is beyond shared access arrangements - Ensure applicants can get planning permission to build an annexe to avoid a future crisis e.g. failing health or reduced independence | |

| Object – Policy 23 Ancillary Accommodation | |
|--|---|
| Number of Comments | 1 |
| Summary of Comments <u>Parish Council</u> Forest Neighbourhood Council said that it is not easy to see how the Council can prevent ancillary accommodation being subsequently used as a separate dwelling and as such, there needs to be provision to prevent ancillary accommodation being subsequently used as a separate dwelling. | |

Policy 24

| Support – Policy 24 Gypsy & Traveller Accommodation | |
|---|----|
| Number of Comments | 17 |
| Summary of Comments <u>Members of the Public</u> Comments included: <ul style="list-style-type: none"> - A range of large and smaller sites are needed so families are able to integrate into the community if they choose to do so, to avoid the negative issues that can evolve from deliberate segregation. - Strategic sites should provide Gypsy and Traveller provision - More provision is needed for Gypsies and Travellers. <u>Statutory Consultees</u> Crawley Borough Council expressed support for the policy and the inclusion of provision on strategic sites. They also provided advice as to how pitch provision should be considered and planned out. <u>Parish Councils</u> Rudgwick and Thakeham Parish Councils expressed support for provision within strategic sites, with Thakeham Parish Council also commenting that regularisation of existing information sites along with provision in strategic sites should provide for the majority of need. <u>Site Promoters</u> Some promoters indicated an ability to provide pitches on their strategic sites should they be allocated. | |

| Observation – Policy 24 Gypsy & Traveller Accommodation | |
|---|----|
| Number of Comments | 11 |
| Summary of Comments <u>Members of the Public</u> Comments included: <ul style="list-style-type: none"> - Would prefer to see pitches increased at existing sites, rather than new provision - Further sites should be identified with careful consultation where needed. - Sites should be made available in remote locations as the Gypsy and Traveller Community and settled communities do not mix. Though other comments suggested pitches should be integrated into existing areas to encourage mixing. - Considers that those areas of the District that haven't provided for Gypsies and Travellers should now be considered by the council. - The Council has failed to previously identify sites and has opened itself up to appeal, undermining adopted plans. - Developing new pitch locations will be financially challenging given the likely economic fallout of the current pandemic. <u>Community Groups</u> Rudgwick Preservation Society commented that they Would like to see strategic sites provide an element of provision for Gypsy & Traveller need. | |

Statutory Consultees

South Downs National Park Authority stated that the HDC GTAA requirements are consistent with those in the South Downs Local Plan. The SDNPA appreciated the importance of addressing the housing need for all the people within our community and recognises the need for cross-boundary partnerships. To reflect the joint work on this issue, they indicated that they would welcome a reference to the SDNPA within Chapter 3 of the HDC GTAA.

Waverley Borough Council commented that they would like to see HDC meet this demand within its own district.

Parish Councils

Nuthurst Parish Council agreed that new Gypsy & Traveller sites should all be provided on new strategic sites but were of the view that new gypsy and traveller sites should not be provided on non-strategic sites.

Storrington & Sullington Parish Council commented that Gypsies & Travellers should be subject to the same rules as the rest of the population, while Rudgwick Parish Council indicated that Gypsy and Traveller sites were a concern to them.

Object – Policy 24 Gypsy & Traveller Accommodation

Number of Comments

14

Summary of Comments

Members of the Public

General comments included:

- Needs cannot just be met on existing sites.
- Meeting needs should be done by expanding existing sites rather than providing new sites.
- Sites should not be provided close to existing settlements.
- The need figure is too high and does not reflect the planning definition.
- Council has identified 93 pitches- where does the 800 come from? Number is too high (x2).

A specific set of comments were made, expressing that criteria in draft Policy 24 (3) need strengthening:

- 1) criterion a) requires a *“safe and convenient access to the highway and public transport services”*, whereas Policy 23(1)(b) of the HDPF stipulates *“a safe and convenient vehicular and pedestrian access. The proposal should not result in significant hazard to other road users”*
- 2) criterion c) requires *“reasonable access to local services and community facilities such as healthcare schools and shops”*, whereas Policy 23(1)(d) of the HDPF stipulates that *“the site is located in or near to existing settlements ...within reasonable distance of a range of local services and community facilities, in particular schools and essential health services”*;
- 3) criterion d) requires that the proposal would not result in *“significant adverse impacts on the amenity of occupiers of neighbouring sites”* whereas Policy 23(1)(e) of the HDPF stipulates that development *“will not have an unacceptable impact on the ... amenity of neighbouring properties”*;
- 4) criterion e) stipulates that the proposal *“would not result in significant adverse impacts on the visual amenity of the local area”*, whereas Policy 23(1)(e) of the HDPF requires that development *“will not have an unacceptable impact on the character and appearance of the landscape”*.

- 5) criterion f) stipulates that “sites at risk of flooding should be subject to the sequential and exception tests”, whereas Policy 23(1)(a) requires that “there must be no significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installation where conventional housing would not be suitable”.

Community Groups

Rudgwick Action Group expressed general support for the policy, agreeing that the identified need should be met through safeguarding existing sites, and then allocating new sites to strategic housing allocations. However, they felt that the sequential approach to meeting the need should be set out explicitly in the policy and the criteria for new sites as set out in Point 3 of the Policy developed to be more in line with national policy requirements and other policies in the Local Plan.

Statutory Consultees

The Environment Agency (EA) noted that criterion 3f states that “sites at risk of flooding should be subject to the sequential and exception tests”. EA argues this is not in accordance with the NPPF. They state that “caravans, mobile homes and park homes intended for permanent residential use” are classified as highly vulnerable in accordance with the NPPF and associated PPG and as such development should not be permitted in Flood Zone 3a or 3b. Only where development is situated in Flood Zone 2 should the Sequential and Exception tests be satisfied. EA would like to see policy amended accordingly to show that sites within Flood Zone 3 will not be permitted.

Parish Councils

Rudgwick Parish Council commented that:

- Sites should be managed, as per conventional housing sites and enforcement of unauthorised sites.
- Rudgwick Parish has met its demand in terms of supply of travellers’ sites.
- They would like to see a thorough assessment of current supply sites before further sites are identified.

West Chiltington Parish Council would like to see additional criteria added under Policy 24 3) viz. “provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and wellbeing of any travellers that may locate there as a result of the new development” and “avoid placing undue pressure on local infrastructure and services”.

Policy 25

| Support – Policy 25 | |
|---|----|
| Number of Comments | 15 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>A number of comments received did not provide a specific reason / aspect for their support. However, of those that did, reasons for support included:</p> <ul style="list-style-type: none"> - Light pollution should be kept to a minimum in new housing areas, ensure lighting impact is contained. - Air quality is a growing problem with frequent highway congestion. - Principles are consistent with the NPPF. <p><u>Parish Council</u></p> <p>Trafalgar Neighbourhood Council stated agreement with this policy.</p> <p><u>Statutory Bodies</u></p> <p>Environment Agency stated that they were pleased that the policy will ensure that the quality of surface and ground waters will be protected and where possible improved. Also support the inclusion of addressing land contamination. Specific mention could be given to the Water Framework Directive and the delivery of this through the South East River Basin Management Plan. This could provide a more proactive policy to direct planners and developers to specific information to ensure that opportunities for improving the water environment will be taken forward.</p> <p>Crawley Borough Council support the policy. However, highlight that there are areas within the northern area of the proposed West of Crawley strategic allocation which, because of air traffic movements, are subject to unacceptable levels of noise for noise sensitive users, including housing. This is particularly the case at night. Such uses should not be permitted in these areas.</p> | |

| Observation – Policy 25 | |
|-------------------------|----|
| Number of Comments | 28 |

Summary of Comments

Members of the Public and community groups

Comments included:

- Air quality is deteriorating, wildlife wiped out, waste increases, floodplains ignored. Council pursues its own ideals without concern of residents or the environment.
- Policy is contradicted by other sections of the plan.
- Large housing development alongside existing developments impacts 'high quality environment' for existing residents.
- Increased pollution will harm physical health and loss of rural environment / local green spaces would have serious impact on mental health.
- Unavoidable consequence of development is invariably leads to reduced air quality.
- Not acceptable to rely on existing water courses, with no plan to improve or maintain.
- There is no evidence to support the statement in paragraph 7.1 that the overall health of the district is good.

Parish Council

Though generally supportive, Rusper Parish Council, questioned whether environmental protection is strong enough, as in their experience it is not.

Pulborough Parish Council observe that the plan makes much mention of conserving and enhancing the nature environment but were unable to find examples of these.

Object – Policy 25

Number of Comments

22

Summary of Comments

Members of the Public and community groups

Comments included:

- Request separate light pollution policy due to proximity to the SDNP which has an international Dark Skies Reserve designation, negative impact of excessive / unnecessary lighting on health such as sleep disturbance, negative impact on wildlife (inc insects) and unnecessary energy use.
- There should be a commitment to match house building with environmental improvement and reduction in carbon through the planting of trees.
- Policy must insist that development reduce overall pollution and emissions consistent with meeting climate change and air pollution objectives.
- Higher priority should be given to the environmental impact of any development.
- The final issue should be amended to read "... high-quality natural environment that will have positive effects on well-being, without causing damage to that environment."
- Criterion 4 should be amended to read, "Minimise the impact of lighting on neighbouring uses and the wider landscape and biodiversity, including potential glare and spillage. Proposals where" This would align with NPPF Paragraph 180.
- An additional criterion should be added that reads "Presumption of refusal to lighting schemes without Lighting Assessments or any schemes that may affect SSSI, Ancient Woodland, designated Nature Reserves or wildlife travel and foraging patterns or wildlife in the wider countryside."
- Criterion 8 should be reworded to "Reduce the number of people exposed to poor air quality including odour. Development that will result in new public exposure, particularly

where vulnerable people (e.g. the elderly, care homes or schools) would be exposed to the areas of poor air quality will not be permitted.”

Parish Council

Shipley Parish Council stated that the strategies relating to the environment fall short of exemplars, such as SDNP, in the County.

Policy 26

| Support – Policy 26 | |
|--|----|
| Number of Comments | 13 |
| Summary of Comments <u>Members of the Public and community groups</u> A number of comments did not provide a specific reason / aspect for their support. Specific reasons for support included: <ul style="list-style-type: none"> - Policy recognises the importance of preserving air quality. - Consistent with principles of NPPF. - Detailed policy to be commended. Environment in which people live / work should be protected and yet balanced at the same time ensuring sustainable development. - Inevitable shift towards electric vehicles over plan period will go a long way to alleviate air pollution issues. - Agree that developers should be responsible for setting up mitigation measures. <u>Parish Council</u> Rusper Parish Council state that the policies within this section of the plan are generally accepted. However, much of the rest of the plan is in contradiction to these policies and they are therefore not being given the priority they warrant. | |

| Observation – Policy 26 | |
|--|----|
| Number of Comments | 25 |
| Summary of Comments <u>Members of the Public and community groups</u> Ifield Society made the observation that air pollution has not been addressed by the site promoters of Land West of Crawley. Rudgwick Preservation Society asked why only two sites were monitored and that the plan should aim to widen this in, for example, Bucks Green where the A281 passes through the settlement. The following observations were made <ul style="list-style-type: none"> - A number of proposed developments are in Storrington and Cowfold both of which have AQMA's. Trust that Council have recognised and calculated the increase of poor air quality and related dangers for existing and new residents. - Proposals are not conducive in improving air quality; proposing employment areas outside of settlement such as Wiston and Rock will result in people driving rather than cycling or walking. - Air quality should be a much higher priority. - A copy of the Air Quality and Emissions Mitigation Guidance for Sussex (2019) should be available to view as part of the accompanying Evidence Base. - Only develop areas near railway stations or a railway line where a station could be built to reduce the number of vehicles on the roads. | |

- Do not build anywhere near areas which already suffer with severe traffic congestion in its centre, such as Cowfold.
- Improve public transport, open new railway stations and build in areas accessible to these services to decrease traffic.
- Limit traffic flow through the District. It is acknowledged that this can only be delivered outside of Horsham District through road improvements such as a weight restriction on Houghton Bridge which would cut HGV traffic. Consider a congestion charge type levy for non-residents.
- Add a spatial objective to reduce air pollution by improving traffic flow or limiting vehicle access.
- A number of the requirements of this policy may already be covered under other legislation and / or policies.
- It may not be necessary / appropriate for all developments to take account of the Air Quality & Emission Mitigation Guidance for Sussex.
- Matters relating to air quality should be assessed on a site-by-site basis.
- More monitoring and enforcement required of movements of vehicles and impact on local areas / residents.
- Inevitable shift towards electric vehicles over the plan period will go a long way towards alleviating air pollution.
- Whole District has been declared an Emissions Reduction Area, no proposals should be allowed that increase emissions on a district-wide-basis.
- Change speed limits to 20mph within a 2km radius of schools on suburban routes to encourage cycling.
- Air quality reduced in recent years due to increase in population.
- Airport has increased in volumes, if 2nd runway goes ahead this will increase poor air quality.

Object – Policy 26

Number of Comments

32

Summary of Comments

Members of the Public and community groups

A number of objections related to the principles of development of proposed strategic sites, with reference made to specific sites and their impact on existing AQMAs.

Other reasons for objection included:

- Cumulative impact of all developments on air quality, especially near AQMA's, must be assessed. Including taking full account of traffic congestion effects.
- Ensure detailed proposals of mitigation are provided.
- Presently ignores any impact to surrounding villages, nature and the environment.
- Amend wording of criterion 3 – “.... congestion through priority access to sustainable transport modes, maximising cycling and pedestrian routes.”
- Mitigation measures are not credible; low percentage of electronic vehicles purchased and insufficient charging points, cycling is dangerous due to narrow and overcrowded roads with few dedicated cycle routes.
- Proposal to install charging points is no solution due to the adverse environmental impact of providing batteries for electric cars.
- There should be specific emission targets within the policy and measures to achieve them.

Horsham Society requested two amendments to the policy:

- Re-word criterion 3 to read “Maximise the provision of cycling and pedestrian facilities by prioritising sustainable modes. Minimise traffic generation and congestion through access to sustainable transport modes;”
- Add new criterion – “Avoid providing air quality sensitive developments, e.g. schools adjacent to heavily trafficked highways.”

Woodland Trust welcomed the principle that development must make a positive contribution. However, recommend the addition of a specific requirement that additional screening will be required for all ammonia-emitting developments, such as intensive livestock units, within 5km of an ancient woodland site. An Ancient Woodland Nitrogen Impact Assessment should be submitted and will need to demonstrate that there will be no deterioration or impacts as a result of the contributions from the development.

Parish Councils

Shipley Parish Council strongly object to any new settlement which would create a number of consequential negative effects on the Parish, including impact on air quality.

Bramber Parish Council believe the detail provided in the policy is a missed opportunity to further enforce the drive for improved air quality. SDNP Local Plan was referenced as a good example.

Statutory Bodies

Natural England object that no link has been made regarding air quality impacts on habitats and species, only human receptors have been included.

Policy 27

| Support – Strategic Policy 27 The Natural Environment and Landscape Character | |
|--|-----------|
| Number of Comments | 12 |
| Summary of Comments | |
| <p><u>Members of the Public and community groups</u></p> <p>A number of individuals and groups either supported or showed some support for Policy 27. They indicated support for the following reasons:</p> <ul style="list-style-type: none"> - Support the aims of preserving the rural environment in the district. However this policy seems at odds with the large scale development on greenfield sites being proposed. - The district is nothing without its landscape. - The Green Infrastructure Network & the Nature Recovery Network are very important in maintaining a high-quality local environment. - The policies in Chapter 7 are to be commended because the environment in which people live and work should be protected and yet balanced at the same time ensuring sustainable development, which the Council's SA considers in detail. <p><u>Parish Councils and Neighbourhood Councils</u></p> <p>Horsham Trafalgar Neighbourhood Council expressed support for the policy.</p> <p><u>Statutory Consultees</u></p> <p>Environment Agency expressed support for the need for development proposals to be landscape led from the outset, which offers the best opportunity to deliver environmental enhancements from the site. Support requirements for maintaining and enhancing the green infrastructure, biodiversity networks and securing biodiversity net gains. Pleased to see the inclusion of SuDS within this policy to link the management of surface water drainage with environmental and landscape enhancements.</p> <p>Historic England expressed support.</p> | |

| Observations – Strategic Policy 27 The Natural Environment and Landscape Character | |
|---|----------|
| Number of Comments | 5 |
| Summary of Comments | |
| <p><u>Members of the Public and community groups</u></p> <p>A number of individuals raised observations in respect of Policy 27 or are considered to be observations relevant to the policy. The key reasons are as follows:</p> <ul style="list-style-type: none"> - The Landscape Capacity Assessment is not available to view. - Too much development will destroy the area, towns and villages. Horsham will no longer be a desirable place to live if the level of development proposed goes ahead. - Preserving our natural heritage and land for growing must be given great prominence in any decision making. Welcome the testing of proposals against environmental considerations which are key. <p>West Sussex Access Forum welcomed the importance given to the provision of Green Infrastructure (GI) but requests that the Public Rights of Way (PRoW) are included in the definition of GI. PRoWs provide green corridors which benefit the natural environment and wildlife and allow access from development and communities out and into the countryside.</p> | |

Parish Councils

Rusper Parish Council generally accept the policies in Chapter 7 but raise that much of the rest of the plan is in contradiction to the policies and query if the policies are being given the priority they warrant, especially given the government declared state of climate emergency.

Object – Strategic Policy 27 The Natural Environment and Landscape Character

Number of Comments

29

Summary of Comments

Members of the Public

A number of comments were made on the relationship between this policy and strategic sites, particularly that development is sought on greenfield land. Commentary about strategic sites are recorded elsewhere.

A number of individuals raised objections to the policy, these are summarised as follows:

- There should be a commitment to avoid urban sprawl which is detrimental to the natural environment due to habitat loss.
- Policy should require development to commit to good Biosecurity principles within any landscape scheme, for example, another outbreak like Ash dieback, or accidental import of a foreign pest or disease would harm the natural environment and potentially destroy the Districts unique and distinct Landscape Character.
- A paragraph should be added to state that biodiversity gains are expected to be maintained over the long term (at least 15+ years), involve locally-relevant species, and that site developers will retain responsibility for ensuring that gains are monitored by independent environmental assessors.
- The policy does not adequately demonstrate that HDC has taken into account the UK's legally binding requirements regarding the Paris Agreement and net zero carbon by 2050.
- The Council should ensure that green corridors, landscape planting, small foot paths and bike lanes are on any new housing developments and safe road crossings for wildlife, tunnels are also built into the plan
- In relation to biodiversity, some felt assessments were inadequate and undefined

Community Groups

Greening Steyning, while welcoming the policy requested that specific reference be given to "natural capital" and also in the analysis.

Horsham Society requested the policy be amended as follows:

- Para 7.16 - Change "is seeking" to "is committed to maintain..." Omit "where appropriate" in first line. Enhancement is essential in all cases to offset decline.
- Criterion 3 Add: "Horsham District Council will strenuously protect and enhance SSSI, Ancient Woodland, Ancient and Veteran Trees, designated Nature Reserves and wildlife in the wider countryside."
- Add "Net gain in biodiversity will be assessed by including adjacent sites, green corridors and wildlife, with an independently confirmation then verified by local experts and Local community groups as to accuracy and completeness." Add : "Biodiversity gain must be on the site plus adjacent sites, not elsewhere or remote from the site"

- Glossary needs definition of “Net gain” compared with what and which areas and on what basis and how independently assessed and how community involved. Serious omission of a key point.

Sussex Area Ramblers consider the benefit of the use of definitive Rights of Way (RoWs) by all users will change completely. The physical and visual amenity, with its consequent benefit to mental and physical health, will be lost with the change from open countryside use on natural surfaces to use within housing estates where the surface will mainly be artificial. The development restrictions enforced as in para 5 of Policy 27 will exacerbate the situation by forcing any agreed developments into the areas not covered by those restrictions.

Sussex Wildlife Trust (SWT) suggest that HDC update GI Strategy irrespective of the partnership project between HDC and SWT. The GI Strategy must be up to date and identify assets and potential for enhancements to connectivity and function. Must be updated because significant changes since the last one published in 2014 and required to give clear spatial impacts of allocations and / or the positive areas for contribution. A strategic approach to maintaining and enhancing both green infrastructure and ecological networks is required. (paras 31 and 171 of the NPPF). SWT raises that HDC has a responsibility to consider biodiversity under section 40 of the NERC Act 2006. There must be clarity over how allocations will impact or deliver towards a resilience landscape / climate change (para 149, NPPF). Suggest HDC should do Nature Capital and Ecosystem Services Assessment. SWT request the policy be amended as follows:

- Criterion 2 insert “strategic” before “Green Infrastructure”
- Criterion 3 insert “measurable” before “net gains”.

The British Horse Society request that public rights off way (green corridors) be included in the Green Infrastructure list of examples in paragraph 7.18 because they are important multi-functional 'green corridors' for the environment.

Parish Councils and Neighbourhood Councils

Billingshurst Parish Council says the policy does not adequately demonstrate that HDC has taken into account the UK’s legally binding requirements regarding the Paris Agreement and net zero carbon by 2050.

Forest Neighbourhood Council (FNC) say in respect of paragraph 7.17 that the character of the Horsham Town is important as representing the character of the town and its history. FNC would like HDC to strengthen this strategic policy to encourage planners, developers, builders and occupiers to take notice of the existing townscape features when designing new or renovated buildings.

Statutory Consultees

Natural England suggests the policy urgently requires revision as the references to landscape protection are confused and unclear. Whilst NE welcomes landscape led development, it is considered the plan fails to secure robust landscape protection via policy or in consideration of site selections. They say it is hard to see how decision makers will apply given the broad content of the policy. Must clarify how the policy relates to the hierarchy of designated sites (see para’s 171 and 174 of NPPF), make clear development resulting in impacts to designated sites would not be supported, and how it applies within protected landscapes and in their settings/the relationship with Policy 30. Criterion 5 should be amended by removing ‘where applicable’ and ‘where possible’ because development in these areas must also protect and enhance the landscape and

visual amenity, with particular reference to the special qualities of the designated landscape and the aims and objectives of the relevant Management Plan.

Developers/Site Promoters

Some developers view the policy as too restrictive, with points made including:

- Criterion 1 should be amended by replacing the start with “Conserve and where possible enhance the landscape and townscape character...”.
- In respect of Criterion 3 it is important that the long term impacts are considered when reviewing proposals for biodiversity net gain taking into account that many of the measures provided as part of the development will need to mature beyond the build period.
- If off-site mitigation provides the best opportunity for biodiversity gain, then the policy should be flexible enough to allow for this.

Policy 28

| Support – Policy 28 | |
|---|----|
| Number of Comments | 13 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>A number of groups and individuals indicated support for the policy without providing reasons for this position, though it was commented that the policy was consistent with the NPPF.</p> <p>The British Horse Society support criterion 1)c as informal recreation was the gateway to more exercise, with benefits for mental and physical health and wellbeing.</p> <p>Sussex Area Ramblers support this policy, stating that it must be adhered to and given high priority.</p> <p><u>Parish Council</u></p> <p>Trafalgar Neighbourhood Council and Bramber Parish Council supported the policy.</p> <p>Rusper Parish Council indicated support although state that much of the plan is in contradiction to the policy. Thakeham Parish Council expressed a similar view, noting that policies 8 and 9 could undermine the policy.</p> <p><u>Statutory Bodies</u></p> <p>Historic England indicated support for the policy.</p> | |

| Observation – Policy 28 | |
|--|----|
| Number of Comments | 20 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Rudgwick Preservation Society expressed that the requirements of equestrian premises sometimes conflict with protection of the countryside. With the unique mix of buildings, sand schools and lighting these are sometimes inappropriately sited. Stricter rules should be introduced and enforced.</p> <p>West Sussex Access Forum stated that development should not damage the rural environment such that it discourages access for leisure, recreation and health and adversely affects tourism.</p> <p>In addition to the above, the following observations were received from members of the public:</p> <ul style="list-style-type: none"> - Policy has the potential to conflict with other exception policies such as Strategic Policy 3 and Policy 20. - Objectives are appropriate. However, policy should not prevent the delivery of allocated sites or other suitable sites adjacent to settlements in the event that the Council fail to have a sufficient housing land supply. - New developments should include more trees as well as the low level planting. <p><u>Parish Council</u></p> | |

Broadbridge Heath Parish Council drew attention to the policy's intent to protect the countryside.

Object – Policy 28

Number of Comments

24

Summary of Comments

Members of the Public and community groups

A number of comments received were in relation to the principles of proposed strategic locations being in contradiction with the objectives of this policy.

The Horsham Society stated that the policy does not give strong enough countryside protection and request additional wording to beginning of criterion 1 – “Preservation of the landscape, nature and its wildlife are the priority under the pressure of development.” Two further criteria are also worded:

- “Horsham District Council will strenuously protect and enhance High Weald Area of Outstanding Natural Beauty (AONB) which will be maintained with special vigilance to ensure appropriate development in or on the boundary of the AONB.”
- “Protected landscapes will include green space barriers to town growth.”

In addition to the points made above, the following reasons for objection were received from members of the public:

- Additional criterion to be included under Part 1 to read – “e) Is consistent with the policies of a made Neighbourhood Plan.”
- Range of other activities that are appropriate within countryside location beyond those listed such as equestrian development.
- Amend criterion 2 to read “In addition, all proposals and development works must be appropriately integrated character and location with strong penalties applied if developers fail to meet these requirements.”

Statutory Bodies

Natural England state this is one of the policies, alongside Policy 27 and Policy 30, which urgently require revision as they pertain variously to landscape protection which result being confused and unclear.

Developers/Site Promoters

Comments included:

- An additional criteria should be added to 1) – “e) The proposals are part of a Whole Estate Plan that has been endorsed by the Local Planning Authority.”

- Wording is more restrictive than language of Green Belt.
- Expand policy to include registered needs in the District such a self and custom build, care homes and dementia care.
- Add criterion 1)e. to read “Where supported by a specific policy reference elsewhere in the Local Plan, a Development Plan Document, relevant Neighbourhood Plan or NPPF.
- Criterion 1 should include reference to the re-use of redundant or disused buildings where it would enhance their immediate setting (NPPF para 79.c)
- Wording “will be protected against” is overly restrictive and not in line with national policy. Re-word policy to ensure it provides a positive approach.

Policy 29

| Support – Policy 29 | |
|---|----|
| Number of Comments | 36 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>The majority of comments received indicated support while expressing that potential strategic locations, largely Land North East of Henfield (Mayfield) and Land West of Crawley, contradicted the policy. Other comments indicated support with providing reasons.</p> <p>Comments in relation to the policy wording included:</p> <ul style="list-style-type: none"> - Agree with change in policy wording "... within the retained 'break' between settlements ..." as the change is not about the development itself but the remainder of any retained perceived gap that should be protected from new lighting or traffic (both physical and volume changes). - Objectives are appropriate. However, policy should not prevent delivery of sites in the event that the Council fails to have sufficient supply of housing land. - Nature of rural land should be protected. - Area of Horsham and individual distinctive characteristics of surrounding settlements will be lost if development is not managed. - Fully support need to protect local identity and a sense of place. - Principles are consistent with the NPPF. - Environment in which people live and work should be protected, and yet balanced at the same time, ensuring sustainable development. - Many ways to solve housing need but preserving our natural heritage and land for growing must be given great prominence in decision making. <p>Rudgwick Preservation Society supported the policy and commented on the need to ensure a gap between Rudgwick and Bucks Green for the integrity and identity of the separate villages.</p> <p>British Horse Society supported criterion 1c) and stated that gaps between settlements were important to encourage a sense of community and provide multi-functional public rights of way for the protection of all vulnerable road users (walkers, cyclists, equestrians).</p> <p>West Sussex Access Forum expressed support for any proposed enhancement to Green Infrastructure to provide opportunities for communities to access the countryside for leisure and recreation which is beneficial for health and wellbeing. They agreed with importance of retaining separate identities of settlements but where they are separated by roads, consideration should be given to the protection of vulnerable non-motorised users safety.</p> <p>In relation to the introduction of Green Belt, comments generally focused on a view to protect particular settlements from coalescing with others. Examples included suggestions of Green Belts between Horsham and Crawley, Horsham and Southwater and Pulborough and Storrington. Other suggestions were made on land being considered for strategic allocations.</p> <p>A point was made by CPRE Sussex that Green Belts would provide stronger protection than current countryside policies in the event that the requirement of a five year supply of land was not met.</p> | |

Parish Councils

Trafalgar Neighbourhood Council agreed with the policy wording and stated that consideration should be given as to whether the designation of Green Belt may be appropriate for the District. They felt that designations should be made to prevent coalescence of Horsham town with Crawley, Southwater, Warnham and Broadbridge Heath and offered examples where coalescence had taken place. Forest Neighbourhood Council largely agreed with this view, stating that there is a danger of coalescence of Horsham and Crawley, and Horsham and Southwater and therefore a need to designate Green Belt.

Rusper Parish Council expressed support but were of the view the policy contradicted other parts of the Plan. Washington Parish Council supported the objectives of the policy to retain the undeveloped nature of the landscape between towns and villages, protecting the local identity and sense of place.

Bramber Parish Council welcomed the policy and noted its relevance to Bramber as highlighted in the emerging Neighbourhood Plan. The identification of Green Belt, as a way of delivery the purposes set out in para 134 of NPPF, was also supported.

Statutory Consultees

Crawley Borough Council supported the policy and noted its importance if Land West of Crawley is pursued. They explained that development adjacent to Crawley on the western side should be sensitive to the important role the countryside plays in providing existing urban residents with direct, physical and visual, access to the countryside.

Historic England indicated support of policies that include the principles of conserving and enhancing aspects of the historic environment, special character and local distinctiveness.

Observation – Policy 29

Number of Comments

30

Summary of Comments

Members of the Public and community groups

The following observations were received from members of the public:

- Coalescence will occur if a number of the proposed sites are developed.
- Policy must be enforceable.
- How/who will ensure that coalescence doesn't occur?
- The policy would apply to situations where no inter-visibility between settlements which can be influenced by variations in topography and existing vegetation such as hedgerows, woodland and tree belts.

In relation to Green Belt comments made included:

- Whilst opportunity is noted; there may be other policy mechanisms – such as the use of locally designated Strategic Gaps or Local Green Space that could also have a role in meeting these objectives.
- Designating potential Green Belt should be part of the local plan to the same extent that housing is.

- Lack of proposals for building within AONB shows the benefits that protection can provide. Without it, urban sprawl is likely to be the main characteristic of much of the district within 100yrs. With environmental concerns, we should be looking this far ahead.
- Green Belt needs to be maintained and enforced. It makes planning slower, but has protections for environmental issues. It also makes the review of impacts on water tables, flood plains, etc. more thorough.

Parish Council

Henfield Parish Council wish to promote the designation of wildlife corridors, areas which promote the connectivity of wildlife. Corridors could be designated across the District and the Parish suggest that there should be a specific policy relating to this subject.

Rusper Parish Council state that the plan needs to make more reference to the distinct character of Crawley and Horsham and ensure that they are kept separate. The plan also needs to identify the settlements between them that would be lost in development.

Developer/Site Promoter

A comment was made that though the objectives were appropriate, the policy should not prevent the delivery of allocated sites or other suitable development sites adjacent to settlements in the event that the Council fails to have a sufficient supply of housing land

Object – Policy 29

Number of Comments

27

Summary of Comments

Members of the Public and community groups

Few residents objected to the policy. One expressed that the policy should be more rigorous and that where new developments of more than 500 dwellings are proposed they should either be adjoining boundary of existing settlement or, if creating a new independent settlement, 10km minimum from existing larger / medium village to maintain the identity and integrity.

Sussex Wildlife Trust questioned the suitability of having the questions within the supportive text and would be concerned to see proposed Green Belt designation in Regulation 19 Submission Plan without further public consultation.

Parish Council

Billingshurst Parish Council stated that the policy needs to be clearer on what 'separation' means as it is not considered appropriate to retain one or a couple of green fields between settlements (except where this already exists).

West Grinstead Parish Council stated at first glance, Green Belt seems attractive suggestion. However, it appears that HDC are considering this as potential means of defending locations against development pressures which may result in coalescence. The area between Horsham and Crawley is not what most people consider Green Belt. Need to be cautious about adopting this as a magic solution to defend locations against development pressures. Political solution is required to redirect employment to less populated areas of northern England to be able to successfully move new housing away from the south-east.

Henfield Parish Council stated designation would be contrary to NPPF, to constrain development in potentially sustainable locations. Each site should be assessed on its merits and not constrained by such a policy.

Statutory Consultee

Brighton & Hove City Council urged strong consideration and weight to the wider sub-regional planning context and the extent of unmet housing needs in neighbouring districts. They noted much of West Sussex and Greater Brighton is subject to physical and environmental planning constraints which effectively rule out large scale development and limit the number of locations which may offer potential for planning strategic growth in the future. The West Sussex & Greater Brighton Strategic Planning Board (which includes HDC) are committed to start to prepare an updated Local Strategic Statement and it is considered appropriate for HDC to wait for the outcome of the evidence studies before making any decisions which may lead to the introduction of further strategic planning designations.

Developers/Site Promoters

Comments included:

- In order to ensure that the policy is justified and effective in accordance with the supporting test of para 7.26 criterion 1. a) and b) should be amended as follows:
 - a) There are no significant effects arising from a reduction in the openness and 'break' between settlements;
 - b) It does not generate negative or harmful urbanising effects within the retained 'break' between settlements, including artificial lighting, development along and / or the widening of the roads between the settlements, and increased traffic movements.
- Proposed policy approach is overly restrictive, the issue of coalescence should be determined on site by site basis with consideration of the settlement in questions and the scale and function of the 'break' between the settlements.
- Unclear on necessity of specific policy given the inclusion of countryside protection policy (Policy 28). Unnecessary hurdle for developers to get over in order to bring forward development on edge of settlements.
- Policies which seek to protect the countryside / prevent coalescence should be applied against the overarching housing need requirement to ensure development needs are met. Policies should only be applied once it is established that the Council can meet its own housing needs and any unmet needs of neighbouring authorities.
- Gaps between settlements are a physical perception relating to the built environment. Increase in traffic is not a factor that directly affect or diminish a settlement gate and furthermore can arise from other developments / factors elsewhere, not associated with any specific development proposed in the gap. Remove increased traffic movement from criterion b).
- Amend criterion 1. a) to read "the significant widening of roads between the settlements". In some instances it is necessary to provide limited widening, especially where there is a need to provide footpath to improve sustainable transport connections.

In relation to questions about Green Belt, comments included:

- NPPF sets out five purposes of Green Belt, the local plan has only identified the need to protect one of these purposes namely settlement coalescence. Other plan policies should be sufficient to prevent this, however, the Council could look to identify areas and include restrictive policies preventing what deems to be inappropriate development.

- Long established countryside policies have successfully protected the countryside from inappropriate development, which it is anticipated it will continue to do so as they will apply to all land beyond proposed strategic allocations.
- Para 135 of NPPF states that new Green Belt “should only be established in exceptional circumstances”, which could include new settlements or major urban extensions. However, this is only where normal planning policies would not be adequate. Further, part (b) sets out that the Council must demonstrate a major change in circumstances which make the adoption of such exceptional measures necessary. There is no change in circumstances in Horsham District.
- Not appropriate in this District and is simply being used as an anti-development tool to constrain development while causing additional costs and impediments to development.
- No objection to designation related to current listed strategic sites but should not be extended wholesale to a district wide assessment.
- Any such review should take place following the adoption of the Local Plan. It should have extensive public consultation and joint working with landowners.
- Questions 2 & 3 are disingenuous; they invite anyone to suggest areas of land not limited to sites “... around or adjoining new developments of a significant size” as outlined in NPPF and it’s a charter to make no development zones to the detriment of residents.
- Not necessary, particularly when adjacent authorities are not designated to form part of Green Belt surrounding London.
- Horsham town is not of a scale which would benefit from being surrounded by Green Belt and there is no evidence that this is necessary or that the requirement of exceptional circumstances is met.
- Not justified as it would restrict the growth and rural economy of the District and would not make the plan positively prepared or effective.
- Normal planning and development management policies would be adequate to control development in rural areas around Horsham.
- Future urban extensions to the most sustainable settlements are likely to be hindered or prevented in the future if designations are made.

Policy 30

| Support – Policy 30 | |
|---|----|
| Number of Comments | 12 |
| Summary of Comments <u>Members of the Public and community groups</u> Comments received included: <ul style="list-style-type: none"> - Support the policy and protection of the AONB but are concerned of development at Newhouse Farm impacting the AONB. - The policy is vital and that such land should not be impacted. - The AONB should be protected at all costs. <u>Statutory Consultees</u> Historic England were supportive of the policy. <u>Other Consultees</u> The Horsham Labour Party indicated support for the policies in this section of the plan. <u>Parish Council</u> Horsham Trafalgar Neighbourhood Council agreed with the policy. <u>Site Promoter</u> A comment received saying the policy is consistent with the NPPF as it balances the environment and sustainable development. | |

| Observation – Policy 30 | |
|--|----|
| Number of Comments | 10 |
| Summary of Comments <u>Members of the Public and community groups</u> Comments received included: <ul style="list-style-type: none"> - Natural heritage should be given prominence in decision making - How would delivery of Mayfield be in the public interest (reference to point 3 of the policy)? - The National Park is a landscape led designation and this should be reflected. - Will the Council be identifying a buffer zone of influence where they would consider how development impacts the National Park. <u>Other stakeholders</u> The High Weald AONB Unit advised that policy should be separated for the High Weald AONB and the National Park as the legislation for the different designations are different. They also explained that there was no requirement for exceptional circumstances to justify major development in the setting of either designation. The Sussex Wildlife Trust supported this view. The South Downs National Park Authority agreed with the High Weald AONB Unit, that the policy should be separated so that there is a clear but separate approach for the National Park and the AONB. | |

Friends of Warnham Nature Reserve wanted a policy to be created to protect development on the fringes of the AONB, suggesting that development should be prohibited within 1 mile of the southern side of the A264 and extended down the east side of Horsham to Southwater.

Parish Council

Rusper Parish Council commented that while generally they were in support of environmental policies, such as Policy 30, other policies contradict their aims.

Site Promoter

The site promoter for Land at Adversane commented that their site would have no impact on the AONB and negligible impact on the South Downs National Park.

Object – Policy 30

Number of Comments

17

Summary of Comments

Members of the Public and community groups

Comments received included:

- The policy should be extended to include other valued local landscapes and other environmental assets (SSIs, Ancient Woodland, etc.)
- The policy should refer to the designations providing a setting to and maintaining the distinctiveness of localities in Horsham.
- The policy is contradicted by proposed development (Land North East of Henfield, West of Crawley).
- The policy should include a buffer of protection around the National Park.
- The National Park should receive the same protection as Green Belt.

Statutory Consultees

Natural England objected to the policy, expressing that criterion 3 was at odds with the NPPF as it does not give due regard to the protection afforded to these landscapes and does not reference the exceptional circumstances test.

Parish Council

Bramber Parish Council thought that the policy should be strengthened to not only protect the landscape but to protect views onto and from the landscape. The Parish Council has identified this in its emerging Neighbourhood Plan.

Site Promoter

Comments raised included:

- That criterion 3 is in excess of national policy and legislative requirements and no evidence has been produced to demonstrate that it is needed
- That the policy can only apply to development outside of the National Park area.
- That the reference to alternatives is ambiguous – it should be reasonable alternatives

Policy 31

| Support –Strategic Policy 31 Green Infrastructure and Biodiversity | |
|---|-----------|
| Number of Comments | 14 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>A number of individuals either supported or showed some support for Policy 31. Reasons included:</p> <ul style="list-style-type: none"> - Support the protection of species. Must not create isolated corridors' or have wildlife cut off between developments - The Green Infrastructure Network is very important in maintaining a high-quality local environment - Very important to preserve and enhance the biodiversity of the District - The principles contained in the policies in Chapter 7 are consistent with the NPPF and are to be commended because the environment in which people live and work should be protected and yet balanced at the same time ensuring sustainable development which the Council's SA considers in detail. <p>Horsham Labour Party indicated support while Rudgwick Preservation Society indicated support but raised concern over ability to pursue the retention of green infrastructure and biodiversity given extent of development.</p> <p><u>Parish Councils and Neighbourhood Councils</u></p> <p>Forest and Trafalgar Neighbourhood Council's both indicated support for the policy but questioned how it would be calculated. Ruser Parish Council indicated support but raised that the rest of the plan is in contradiction to the policy. Southwater Parish Council indicated support.</p> <p><u>Statutory Consultees</u></p> <p>Environment Agency supported the specific requirement to ensure that existing fresh water features are retained and enhanced as it will drive a number of opportunities to maximise opportunities on development sites to promote biodiversity net gain and help achieve the objectives and requirements under the Water Framework Directive. On a note of clarity there appear to be some duplications between this policy and strategic policy 27 which also has requirements around green infrastructure and the Nature Recovery Network. They support these requirements but recommend that there is a consideration to ensure there is clarity across the policies or where necessary cross referencing.</p> <p>South Downs National Park Authority (SDNPA) supports the criteria within SP31 and would like to see reference to the SDNP within the supporting text, acknowledging the links between the Park and the Horsham Plan Area. Considered particularly important where there are large or connecting areas of green infrastructure and where their joint and adjacent local communities are working on Neighbourhood Development Plans. The SDNPA has prepared studies and strategies considering the links to areas on the edge of the SDNP boundary, which may be helpful in identifying links as the Horsham District Plan preparation continues.</p> <p><u>Site Promoter/Developers</u></p> <p>A number of site promoters indicated support for the policy and stated that they could achieve policy goals on their site.</p> | |

| Observations –Strategic Policy 31 Green Infrastructure and Biodiversity | |
|---|----|
| Number of Comments | 24 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>A number of groups and individuals raised observations in respect of Policy 31. This included:</p> <ul style="list-style-type: none"> - Comments relating to the importance of green spaces for flood control, climate change, health and wellbeing, heritage and food growing - Development would cause biodiversity loss. - Hyperlinks should be inserted to relevant documents. - Calculations as to have net gain is measured should be included. - Developers must be made responsible for demonstrating long-term improvement in biodiversity, through funding independent assessors. Biodiversity gains must be maintained over the long term (at least 15+ years) and involve locally-relevant species. - Particular sites (e.g. Rookwood Golf Course, Chesworth Farm) should be designated as Local Nature Reserves and should not become isolated. - Economic development should not trump environmental concerns. <p>Horsham Society raised a number of issues relating to the policy including:</p> <ul style="list-style-type: none"> - request that policies identify new sites to create a major tree planting scheme and new Forests to offset climate change. - Request the inclusion of a definition of “environmental net gains”, “ecosystem services” and “nature recovery programme” in Glossary. - The environmental protection policy should start now and biodiversity gain must be more widely assessed. - Text should be added to make it clear “Net gain in biodiversity will be assessed by including adjacent sites, green corridors and wildlife, with independent confirmation then verified by local experts as to accuracy and completeness.” - The Plan needs to recognise a presumption against building on or adjacent to wildlife sites and Local nature Reserves - Environmental degradation should be prevented. - Seek the inclusion of the following in policy, “Presumption of refusal to lighting schemes without Lighting Assessments or any schemes that may adversely affect SSSI, Ancient Woodland, designated Nature Reserves or wildlife travel and foraging patterns or wildlife in the wider countryside.” <p>Sussex Ornithological Society's note there is no up-to-date Green Infrastructure Plan giving the impression that green infrastructure and biodiversity are unimportant considerations.</p> <p>Woodland Trust recommend in response to Policy 26 that within 5km of an ancient woodland extra care is taken when considering ammonia-emitting developments such as intensive livestock units.</p> <p><u>Parish Councils and Neighbourhood Councils</u></p> <p>Henfield Parish Council suggested wildlife corridors could be designated and mapped across the District and that there should be a specific policy relating to this subject</p> <p>Horsham Denne Neighbourhood Council query how biodiversity net gain is calculated.</p> | |

| Object–Strategic Policy 31 Green Infrastructure and Biodiversity | |
|---|----|
| Number of Comments | 64 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>A number of comments related to potential site allocations (both strategic and smaller sites) and whether the policy was consistent with such allocations. Such comments are covered in other summaries, where relevant.</p> <p>A number of individuals raised objections to the policy, these are summarised as follows:</p> <ul style="list-style-type: none"> - The policy is weak and its priority order needs to be reconsidered. It must be a positive policy towards protection of the environment and wildlife, not a positive to development. Once land is developed, what was there is lost and such existing features should be retained. - New development should be more positive for biodiversity – more tree planting, hedgehog gaps, bird boxes, use of wildlife friendly bricks, wildlife corridors, meadow planting, etc. - Local experts should be consulted on relevant planning applications and this should be written in policy. - Hedgerows and woodland should have greater protection and felling limited. - Replace the act of “tree planting” with the “creation of woodland” with appropriate maintenance / management. - Biodiversity net gain is not achievable with increasing development and that planning cannot control residents – i.e. mowing the lawn and removal of mitigation measures. - Biodiversity net gain is not measurable or enforceable. - Biodiversity net gain is not immediate and needs long term measures to be provided. - The policy should refer to the construction phase of development and its environmental impact. - The policy is not flexible enough to allow off-site mitigation. - Buffer zones for ancient and veteran trees should be stipulated in policy. <p>CPRE Sussex recommended the inclusion of an additional <u>strategic policy specifically for Ecosystem Services</u>, referencing para 170 of the NPPF. They provide wording for the new policy. They suggest “Ecosystem Services” be defined and explained in the Local Plan. CPRE object to Policy 31 and recommends that it be split into two strategic policies, one specifically for Green Infrastructure (GI) and the other for Biodiversity. Both High Weald AONB Partnership and Sussex Wildlife Trust (SWT) also supported this view. The SWT also made the following specific points:</p> <ul style="list-style-type: none"> - The GI Study is not provided in the evidence base - Local Nature Partnership should replace or supplement reference to Local Economic Partnership - In reference to paragraph 7.37, they support delivery of 10% net gain but relies too heavily on individual pocket of information. Need a strategic approach, potentially the Nature Recovery Network, so where onsite gain not possible there is a coherent and strategic delivery method to maximise benefits rather than piecemeal pockets of habitat creation. - Suggest amendments to criterion 1, at the beginning insert “Development proposals should be submitted with up to date ecological information.” Also suggest replacing “resisted” with “avoided” - For criterion 4, insert after “existing biodiversity” a full stop and the following “Impacts on biodiversity must be avoided, where this is not possible mitigation and compensation will be required. In addition to this, a minimum 10% net gain will be required in line with the Defra Metric, this should be achieved through the delivery of appropriate...” | |

Horsham Society seek the following amendments:

- Inclusion of a definition of 'net gain' in the Glossary which takes account of what, which areas, on what basis, how independently assessed and how community involved. Biodiversity gain must be on the site plus adjacent sites, nowhere else.
- Include "Horsham District Council will strenuously protect and enhance ANOB, SSSI, Ancient Woodland, Ancient and Veteran Trees, designated Nature Reserves and wildlife in the wider countryside. Landscaped buffers will be required as 50 metre deep buffer zones against ancient woodland, SSSI, Ancient Woodland and designated Nature Reserves, 15 metres against Ancient and Veteran Trees."
- Include "New developments will provide a minimum of 15% by area of forest tree planting to increase carbon capture and biodiversity together with funded management plans."
- Criterion 6 in the policy: Remove the hierarchy, there should be a presumption against development adjacent or on these sites. Omit "to the hierarchy" add "to all sites". Insert "Ancient Woodland, Ancient and Veteran Trees, hedgerows and green corridors."

The British Horse Society request that Public Rights of Way (PRoW) be mentioned as multi-functional Green Infrastructure. The inclusion of a bridleway (green corridor) built into the GI brings benefits for safety and connectivity of all non-motorised users

West Sussex Access Forum welcomes the aim to maintain and enhance GI within the District. However, the description of GI given in the text should include PRoW, which can act as a green link between developments and the countryside.

Woodland Trust while supporting criteria 2 and 3, recommend:

- strengthened wording to protect ancient woodland and veteran trees given they are irreplaceable, vulnerable limited resource of the richest terrestrial wildlife habitats, and to accord with para 175c of the NPPF.
- They provide suggested wording which also includes ancient wood pasture and historic parkland and suggest that every hectare lost is replaced by creation of 30ha. Request the setting of a ratio for tree replacement and suggest 2:1 for all but the smallest trees and 8:1 for the largest trees, in line with guidance.
- Also request that on suitable sites, a tree canopy cover target be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure. They note that integrating trees and green spaces early in the development design process minimises costs and maximises the environmental, social and economic benefits they provide and point to guidance they've produced.

Parish Councils

Billingshurst Parish Council stated that the policy does not adequately demonstrate that HDC has taken into account the UK's legally binding requirements regarding the Paris Agreement and net zero carbon by 2050.

Statutory Consultees

Natural England state that revision is required, explaining:

- Green Infrastructure (GI) and Biodiversity should be separate policies.
- Policy lacks clarity, it fails to appropriately highlight important statutory sites, and the hierarchy is inaccurate.

- The policy fails to cite Ramsar Sites/include robust protection of international wildlife sites, undermining undermines the protection of statutory sites and ancient woodland in the NPPF.
- Criterion 7 does not reflect para 175c of the NPPF and its protection of statutory sites and irreplaceable habitats and fails to mention priority habitats which the council has a duty under the NERC Act to protect, nor mention of protected species. GI has biodiversity at its core but must also be multifunctional and consider landscape, climate change, health and wellbeing, recreation and education. NE would welcome involvement in Horsham's Green Infrastructure strategy. Key elements of the NRN and GI will relate to the NE's Sussex Bat Protocol, climate change adaptation, wetland habitats and incorporation of strategic solutions re water resources and resilience.
- Arun Valley SPA is cited but should be amended to include the SAC and Ramsar Site. Must include a need for development to mitigate for adverse impacts from Wastewater Treatment Works which outfall into the catchment of the river Arun (such as, if deemed appropriate, nutrient neutrality) and secure the protection of the water resources (such as, if deemed appropriate, water neutrality). Its catchment must also be recognised as a key opportunity area for nature recovery, GI provision, climate change adaption, and strategic approach to wetland creation can achieve multiple benefits.
- The Mens SAC and Ebernoe Common SAC must be included with protection given to the functionally linked habitats (both core and wider conservation areas), with a reference to NE's Sussex Bat SAC protocol. Horsham District includes functionally linked habitat to these e.g. the bat sustenance zone. The policy should be similar to SDNPA's which provides robust policy protection through an international sites policy, identifying key supporting habitat for the bats outside of the SACs including both 6.5km 'Key' and a 12km 'Wider' conservation areas. Development within which must not adversely impact the SACs and where the Sussex Bat SAC protocol applies.

Further comments included seeking amendments to or making observations to the following:

- Criterion 1 - To maintain a resilient ecological network through and across the district the policy must also resist development which results in degradation or harmful impacts to the GI and Nature Recovery Network (NRN). Mitigation for all impacts (not just loss) should be sought in order to ensure the GI and NRN network can be maintained and enhanced as the policy intends.
- Criterion 2 –Welcome additional hedgerow and tree planting but criterion should be clearer re: appropriate schemes, how the 'local and wider context, habitats and species' should be considered, and that opportunities to enhance habitat networks (including linear features such as hedgerows, tree lines and water features/riparian habitats) should be maximised.
- Criterion 3 –When replacing like-for-like trees, the initial age and condition of the replacement tree(s) should be considered together with the ultimate height and spread, to ensure continuity of habitats and to maximise benefits to biodiversity and natural capital.
- Criterion 4 –welcome minimum 10% net gain in biodiversity which should be secured on site but note off-site provision may be necessary so the mechanism must be clear. HDC are referred to Good Practice Guide (2019) and in particular the 10 good practice principles and chapter 4. NE supports inclusion of a clear and positive net gain strategy that aims to minimise impacts on biodiversity and secure appropriately funded, long term measurable gains for the natural environment. Strengthened by long term monitoring. It is likely the use of the Biodiversity Metric will be mandated. Details of the metric to use may best go in Supplementary Planning Document (NE can advise) to which the plan should reference, the policy should outline the need for a quantitative approach and a consistent means of calculating gains.

- Criterion 5 –development should retain and enhance features of biodiversity value in order to secure net gains
- Criterion 6 –Ramsar sites should be included in 6(a)

Developer/Site Promoters

A number of comments made reference to particular sites that they were promoting and how the policy approach could be met differently or questioned how other sites could not meet the requirements.

Specific comments on the policy included:

- the policy be amended to include the following at the end of criterion 4 “or using alternative land in the district if in control of the applicant and meets biodiversity objectives.”
- Criterion 4 is over prescriptive and should not include a specific net gain figure/percentage. Neither the NPPF nor PPG specify a percentage figure for biodiversity net gain and the implementation detail is yet to be agreed.
- Should be redrafted in a flexible manner so that the policy can respond to the latest national policy.
- should be amended by replacing the ending after “not practicable” with “*or desirable, to offset the delivery to the Nature Recovery Network, or another suitable biodiversity improvement programme, including those identified in a Whole Estate Plan, endorsed by the Local Planning Authority.*”
- It is unclear what the cost implications for a development could be. This should be considered and potentially set out in a Supplementary Planning Document (SPD).
- Criteria 2 and 4 are over prescriptive. Sometimes development will require the removal of trees and hedgerows which may have little value in terms of amenity or ecology. A balance is needed and also consideration to commuted payment for off-site replacement.
- Policy 31 be amended by the inclusion of the following at the end of criterion 4 – “or using alternative land in the district if in control of the applicant and meets biodiversity objectives”.

Policy 32

| Support – Policy 32 | |
|--|----|
| Number of Comments | 19 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>A number of groups and individuals expressed support but did not explain why.</p> <p>West Sussex Access Forum supported the requirement to enhance Local Green Space functions to include improvements to access and recreation.</p> <p>Comments of support included:</p> <ul style="list-style-type: none"> - Local green spaces within towns and villages and surrounding settlements are very important. - Green space should be protected and should not be used for any business / commercial or residential developments. - Principles contained within the policy are consistent with the NPPF. - Criterion 1.a is important for informal recreation and beneficial for non-motorised users. <p><u>Parish Councils</u></p> <p>Trafalgar Neighbourhood Council strongly agreed with the need to protect Local Green Space but objects to wording of criterion 2 (as outlined in summary of objections).</p> <p>Thakeham Parish Council supported the policy, but advised that unless Policies 8 and 9 are strengthened, there will be potential for tension between these policies. Rusper made a similar view, stating that though they supported the policy, it contradicts with other elements of the plan.</p> <p>Forest Neighbourhood Council welcomed the protection of green infrastructure, biodiversity and local green spaces.</p> <p><u>Statutory Consultees</u></p> <p>South Downs National Park Authority supported the criteria within the policy.</p> | |

| Observation – Policy 32 | |
|--|---|
| Number of Comments | 9 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>West Sussex Access Forum stated that clarification is required in relation to the wording of the policy citing that Criterion 1 was unclear and sub-paragraph b appears incomplete.</p> <p>Woodland Trust welcomed the principle of protection and urged adoption of following policy standards:</p> <ul style="list-style-type: none"> a) No person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size | |

- b) There should be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.

A number of observations were received in relation to the principles of this policy and the relationship with proposed strategic sites. In addition to these comments the following observation were received:

- Policy states designated areas will be identified on Policies Map, but how will this be the case if designated by a Neighbourhood Plan that is 'Made' after the adoption of Local Plan?
- Local Green Spaces should have the highest level of protection for the benefits of physical and mental health.
- Vital to protect all green spaces around Horsham Town.
- Encourage their use such as park runs, events, concerts etc
- Council should seek to provide additional green spaces
- New development should fund new local green space.
- Council will need to be able to demonstrate that any areas designated meets the tests outlined in NPPF and PPG.
- Criterion 2 should make clear that any designation through Neighbourhood Plans would have to demonstrate it meets the test set out in PPG.

Object – Policy 32

Number of Comments

10

Summary of Comments

Members of the Public and community groups

Horsham Society requested an additional criterion to read – “New developments will provide a minimum of 10% by area of new Green Space to increase carbon capture and biodiversity together with funded management plans.”

A number of objections have been received in relation to the principles of proposed development sites contradicting the objectives of this policy.

In addition to the points made above, the following reasons for objection were received from members of the public:

- Amend criterion 2 to read – “The removal of green space from communities must be tempered by the designation of publicly accessible green space – supported and allocated through Neighbourhood Plans,”
- There should not be a reason to remove local green space.
- Criterion 1.a is not consistent with the NPPF, para's 100 and 133.
- Remove the term 'publicly-accessible' from criterion 2 – this term is not used in NPPF and imposes a further restriction, refer to para's 99-100.
- There should be a presumption against all development on green space or green fields, with development having to be within existing settlement boundaries on brownfield sites.

Parish Councils

Trafalgar Neighbourhood Council requested criterion 2 be amended to read: “.... recreational value, tranquillity and ecological value. The Council will have a shared responsibility with Parish or Town Councils or Neighbourhood Forums to ensure that such green space does not conflict with

the strategic policies of this Local Plan. Where no Neighbourhood Plan is 'made', the Council will be responsible for the creation of new publicly-accessible green space (underlining indicates new text).

Policy 33

| Support – Policy 33 | |
|---|----|
| Number of Comments | 15 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Woodland Trust support the policy, in particular criterion 5 on retaining and enhancing green infrastructure. They also recommended guidance published by the Trust</p> <p>A number of representations of support did not include specific reasons. However, reasons for support included:</p> <ul style="list-style-type: none"> - Quality of new development is subjective. Policy reflects current thinking in an attempt to create good quality development taking into account viability which often determines how quality aspects can be achieved. <p><u>Parish Council</u></p> <p>Thakeham Parish Council generally supported the policy but proposed a caveat regarding lower densities with regards to criterion 4 – “lower densities can be justified where the impact of the maximal resident number for the site would otherwise create unacceptable impact on local infrastructure.”</p> <p><u>Statutory Bodies</u></p> <p>Crawley Borough Council supported and welcomes this policy but suggested that greater clarification and detail could be added which would outline specific and practical design parameters and approaches to guide the form of new development.</p> <p>Historic England expressed support for the requirements for good design and planning in new development that respects the defining characteristics of each part of the District.</p> | |

| Observation – Policy 33 | |
|--|----|
| Number of Comments | 12 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Comments included:</p> <ul style="list-style-type: none"> - Previous large scale developments in the area still look bland and characterless after many years. - Council should take an active role to design developments in a way that encourages all services and facilities to be located within walking distance as well as integrated cycle ways. - Houses need to be sustainable while also having some element of character to blend with existing properties. - Set a target for some larger houses to provide more balance to the community. - Criterion 6 refers to Design Statements. Such documents may have policies relating to the other criterion in the policy. | |

Parish Council

West Grinstead Parish Council commented that they would like to see HDC take a more proactive role in championing good design.

Rusper Parish Council stated that this is an area that could be more aligned with the environmental aspirations of the plan.

Denne Neighbourhood Council asked if the retention of existing landscape belts etc (criterion 5), only apply to field boundaries and whether any protection can be given to green corridors that are essential for wildlife movement?

Object – Policy 33

Number of Comments

12

Summary of Comments

Members of the Public and community groups

The Horsham Society propose two additional criteria:

- “Design and materials will be of the highest quality and not viability driven. These should be based on National and Local Design guides and also those of Civic Societies. This should not prevent or discourage modern innovative design.”
- “There will be a presumption against demolition of historic (nationally and locally listed) buildings unless the alternatives for reuse, repurposing or repair have been fully explored and that innovative replacements are proposed.”

In addition to the points made above, the following reasons for objection were received from members of the public:

- Plan needs to demand much more than the bare minimum from development.
- Amend criterion 5 to read – “.... character of the landscape should be retained while new wildflower habitats should be encouraged on some of the communal space to improve the biodiversity of the site.”
- Encourage use of local traditional materials such as flint.
- Design to help achieve zero carbon by 2050.
- Respond to para 15, 2nd bullet of ‘Planning for the Future’ publication (Ministry of Housing, Communities and Local Government).
- Developers should be responsible for the repair, improvement and enhancement of any length of road within 1mile of each development.
- Design features that prevent extensions to existing properties should be encouraged to preserve an adequate number of small homes and reflect the housing need for the area.

Statutory Consultees

The High Weald Joint Advisory Committee requested an additional criterion – “Within the High Weald AONB proposals for housing development should have regard to the High Weald Housing Design Guide.”

Policy 34

| Support – Policy 34 | |
|---|----|
| Number of Comments | 14 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>A number of representations of support did not include specific reasons or remit. However, reasons for support included:</p> <ul style="list-style-type: none"> - Support good design, quality and retention of local character. Designs for new build and alterations should be in line with locale. - Reflects good practice. <p>The Woodland Trust expressed support for the policy, particularly criterion 8 on retaining existing important landscape and natural features. Recommend reference to guidance.</p> <p><u>Parish Council</u></p> <p>Thakeham Parish Council generally support but propose strengthening criterion 9 to be a stronger presumption.</p> <p>Forest Neighbourhood Council agrees with the policy but comments that enforcement is the key.</p> <p><u>Statutory Bodies</u></p> <p>Crawley Borough Council supported the policy. However, they suggest greater clarification and detail could be included which would outline specific and practical design parameters and approaches to guide the form of new development.</p> <p>Historic England supported the requirements for good design and planning in new development that respects the defining characteristics of each part of the District.</p> <p><u>Other Consultees</u></p> <p>Gatwick Airport Limited supports this policy but considers that the supporting text, in relation to criterion 3, would benefit from explaining more about how matters such as noise, vibration and odour would be considered. For example, noise – GAL considers that it would be appropriate to refer to the Noise Policy Statement for England as well as Planning Practice Guidance on Planning & Noise for New Residential Development as the basis for making decisions.</p> | |

| Observation – Policy 34 | |
|--|----|
| Number of Comments | 12 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>The following observations were received:</p> <ul style="list-style-type: none"> - Wildlife habitats can be incorporated into buildings to compensate for habitats already lost such as Swift, Bat and Sparrow nests. | |

- Aim should be, as far as possible, to reduce resources by building thermally efficient housing, micro generation of electricity, use of heat pumps and local rain and waste water recycling.
- Housing needs to be sustainable while also having some element of character.
- Needs to be realistic parking provision available.
- Developments should propose sustainable building using more modern technology.

Parish Council

Rusper Parish Council observed that there could be much more alignment with the environmental aspirations of the plan.

Denne Neighbourhood Council asked if light pollution can be referred to within criterion 3.

Object – Policy 34

Number of Comments

12

Summary of Comments

Members of the Public and community groups

Horsham Society requested two additional criterion to read:

- “Design and materials will be of the highest quality and not viability driven. These should be based on National and Local Design guides and also those of Civic Societies. This should not prevent or discourage modern innovative design.”
- “There will be a presumption against demolition of historic (nationally and locally listed) building unless the alternatives for reuse, repurposing or repair have been fully explored and that innovative replacements are proposed.”

Horsham District Cycling Forum requested the principles of para 98 of NPPF are included within the policy and an amendment made to criterion 10 “... and the storage of bins/recycling facilities noting the guidance in Manual for Streets that cycle parking should be as convenient as car parking;”. In addition they felt that new criteria should be included:

- “Developments must incorporate a dense, connected cycle network composed of physically protected cycleways on main roads, low-speed, low-traffic streets and greenway-type paths away from motor traffic routes, all connected by junctions of an equivalent high standard.”
- “Upgrades of the existing road network should also meet the above standard.”
- “Where there is a genuine insufficient space to provide walking and cycling provision in parallel (for instance alongside main roads) a cycleway should be constructed (upon which people can walk) rather than a shared use footway.”

CPRE Sussex requested the following criteria to be included in the policy:

- “Maximise opportunities to mitigate, adapt and improve resilience to climate change;”
- “Maximise opportunities for cycling and walking, including multi user routes and, where possible, facilitate circular routes; cycle paths should not be designed in ways that create barriers to the movement of wildlife or that lead to the fragmentation of habitats;”
- “Support health and wellbeing and improve opportunities for understanding and enjoyment of the countryside, and of green spaces within built areas.”

The British Horse Society requested inclusion of a principle regarding the provision of safe recreational/utility access routes, public rights of way, providing connectivity within development and to the surrounding area.

In addition to the points made above, the following reasons for objection were received from members of the public:

- Criterion 1 is not consistent with NPPF. Object to the term 'prioritise' in relation to previously developed land.
- It may not be appropriate in all circumstances to follow the requirement of criterion 5.

Parish Councils

Billingshurst Parish Council stated that the policy should make reference to accommodating, where reasonable, people of older years and those with disability.

Statutory Bodies

Sport England requested the following wording to be inserted to criterion 10, "Providing pedestrian, cycle and public transport priority over the use of private cars;"

Policy 35

| | |
|--|-----------|
| Support – Policy 35 | |
| Number of Comments | 12 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>The majority of those commenting did not provide reasons for their support of the policy.</p> <p>Rudgwick Preservation Society agreed with policy, especially with regard to inclusion of designated and non-designated heritage assets. They supported reference to Horsham Stone in supporting text but questioned suitability in new build due to its weight.</p> | |
| <u>Statutory Bodies</u> | |
| <p>West Sussex County Council stated that the policy is well-written and does not suggest any amendments. The encouragement of the use of very distinctive Horsham Stone, for roofing, is welcomed.</p> <p>Crawley Borough Council welcomed this policy but in addition suggests that greater clarification and detail could be added which would outline specific and practical design parameters and approaches to guide the form of new development.</p> <p>Historic England identified broad support for the policy.</p> | |

| | |
|--|-----------|
| Observation – Policy 35 | |
| Number of Comments | 12 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>A number of observations were received in relation to the principles of this policy and the relationship with proposed strategic sites. In addition to these comments other views expressed included:</p> <ul style="list-style-type: none"> - Council should not permit developments that imitate old architectural styles. Good design can exist in 21st Century and there is a need to offer good examples of current design for future heritage. Good design should be recognised from all periods. - More Conservation Areas should be designated, to help maintain heritage and encourage tourism. | |
| <u>Parish Council</u> | |
| <p>Denne Neighbourhood Council asked when Conservation Area Appraisals would be completed and whether they would provide any additional protection.</p> | |

| | |
|----------------------------|-----------|
| Object – Policy 35 | |
| Number of Comments | 12 |
| Summary of Comments | |

Members of the Public and community groups

A number of objections were received in relation to the principles of proposed development sites and the relationship with the objectives of this policy.

Horsham Society proposed two additional criteria:

- “There will be a presumption against demolition of historic (nationally and locally listed) buildings unless the alternatives for reuse, repurposing or repair have been fully explored and that innovative replacements are proposed;”
- “Proposals to alter or extend Listed Buildings, including the curtilage of listed buildings, locally listed buildings, or within conservation areas, must be accompanied by a comprehensive Heritage Statement that includes alternatives for reuse, repurposing or repair;”

The Steyning Society proposed an amendment to the working of criterion 1 – “Make reference to the relevant Conservation Area Appraisal and Management Plan and show how it has been taking into account. In addition, it should explain and illustrate an understanding of the significance of the asset”

In addition to the points made above, the following reasons for objection were received from members of the public:

- Restore the broader and more positive wording currently used in the adopted HDPF Policy 34.
- For clarity and consistency with the NPPF the policy should also refer to different policy tests which should be applied to developments affecting non-designated heritage assets.
- Additional requirement for schemes to demonstrate that the substantial public benefits gained would outweigh the loss of the asset goes beyond the tests set out in national policy.
- As drafted, the policy just refers to ‘heritage assets’ which could lead to confusion and misinterpretation.
- Replace ‘preserve’ throughout policy with ‘conserve’.

Policy 36

| Support - Policy 36 Shop Fronts and Advertisements | |
|---|---|
| Number of Comments | 7 |
| <p>Summary of Comments</p> <p><u>Members of the Public</u> Some that commented indicated support with the policy.</p> <p><u>Parish/Neighbourhood Councils</u> Horsham Trafalgar Neighbourhood Council indicated support for draft policies in this section.</p> <p><u>Community Groups</u> The Steyning Society indicated support of the policies in this section, while Rudgwick Preservation Society also expressed support</p> <p><u>Statutory Consultees</u> Historic England endorsed the policy but stated that the policy should include a clause setting out the intention to address particular issues identified during the development of the evidence base, including heritage at risk, and the appropriate reuse of historic buildings that may be underused or vacant and therefore vulnerable to being at risk.</p> | |

| Observation - Policy 36 Shop Fronts and Advertisements | |
|--|---|
| Number of Comments | 3 |
| <p>Summary of Comments</p> <p><u>Members of the Public</u> One member of the public commented that the preservation of the character of the area may not be the correct objective. Traditional materials typically have a high carbon footprint. Remove traditional look provision.</p> <p>Another comment considered that HDC does not follow its own policies with its new illuminated sign in Steyning High Street advertising its own events. They referred to the new illuminated display board erected in the car park in the Conservation Area of Steyning High Street being against the policy and that it was detrimental to the appearance of the area by means of size, character, design and illumination. They questioned the confidence residents could have in HDC's ability to enforce its own policies if it flouts them itself?</p> <p><u>Parish/Neighbourhood Councils</u> Horsham Denne Neighbourhood Council Points 3 & 4 queried whether it was possible to include limitations on the use of "A" Boards or is this only under the control of WSCC Licensing?</p> | |

| Object – Policy 36 Shop Fronts and Advertisements | |
|---|---|
| Number of Comments | 3 |
| <p>Summary of Comments</p> <p><u>Members of the Public</u></p> | |

Comments made included suggestions that the following criteria should be added to the policy:

- There will be a presumption against opaque glazing which prevent shop front transparency.
- There will be a presumption against touch screens on shopfront or variable flashing advertising and images.

Parish Councils

Thakeham Parish Council objected to what they felt was the weakening of this policy with regard to protecting the setting of heritage assets. Although they felt it was improved in some ways, they objected to the new policy dropping the important previous commitment to retain and improve the setting of heritage assets, including views, public rights of way, trees and landscape features. They felt the protection of the setting of heritage assets, including Conservation Areas, remains vital.

Policy 37

| Support – Policy 37 Climate Change | |
|---|----|
| Number of Comments | 21 |
| <p>Summary of Comments</p> <p><u>Members of the Public</u> General support for the policy was mentioned albeit some felt that measures should go further.</p> <p><u>Parish/Neighbourhood Councils</u> Horsham Trafalgar Neighbourhood Council supported the policy in principle but would prefer the wording to be tighter and would like more ambition in what the Council seeks from developers.</p> <p><u>Statutory Consultees</u> The Environment Agency expressed support but recommended that specific mention is also made in this policy with regard to resilience to ensure that development through this Local Plan can be resilient to tomorrow's climate. They supported the requirements with regard to water efficiency, however, recommended that the plan is developed to consider the recommendations from the Gatwick Diamond Water Cycle Study.</p> <p>Crawley Borough Council supported the proposed 19% reduction for new build homes on major developments, although it is considered that this could be extended to all new build dwellings. However they suggested it would be sensible to acknowledge within the policy that the proposed local standards may be superseded by new national standards during the lifetime of the plan. They also explained that it would therefore be advisable to reword the carbon reduction section so that measures 1 to 5 are overarching objectives which sit alongside the 19% reduction target as not all are related to the 19% target.</p> <p><u>Other Consultees</u> The Woodland Trust supported the policy but proposed that wording be amended to recognise the key role of trees in carbon reduction and climate mitigation, citing work by the UK Committee on Climate Change that will require all major public bodies to play their part in identifying sites and supporting conservation of existing mature trees as well as new tree planting. The following suggestions were made:</p> <ul style="list-style-type: none"> - Under Carbon reduction, add new para 6) Increasing tree canopy cover <i>by retaining existing and planting new trees as an integral part of development sites;</i> - Under Climate change adaptation, add new wording to para 3) <i>Green infrastructure including trees and hedgerows and dual use Sustainable Urban Drainage Systems (SuDS).</i> | |

| Observation – Policy 37 Climate Change | |
|--|----|
| Number of Comments | 56 |
| <p>Summary of Comments</p> <p><u>Members of the Public</u> General observations on this policy state that it does not go far enough and that it should have more emphasis on the Paris Agreement. There is a general consensus that more emphasis should be placed on all new homes and extensions being zero carbon by 2050.</p> | |

There was also the recommendation that Para 9.1 be updated to identify that Horsham District Council will identify the district's pathway to net-zero carbon by 2050, with intermediate targets and milestones. All infrastructure and other proposals will be assessed to show how they contribute to meeting these.

One respondent expressed that they wanted to see Policy 37 amended to 'include a requirement that for major developments the Developer commissions a design study to demonstrate how the net increased surface water runoff from the proposed development will be prevented from discharging into existing watercourses. The surface water runoff mitigation measures proposed by the Developer should be fully described in the studies Report. The Report of the Developers' study to be assessed by HDC and approved'

Parish Councils

Rusper Parish Council and Billingshurst Parish Council both expressed that they would like to see this section of the plan moved to Chapter 3 to emphasise its importance and to set the reference point for all other sections of the plan. They commented that should the government have any chance of achieving the ambition of becoming net carbon zero by 2050, then such policies must form the basis of all other policies.

Site Promoter/Developer

A comment was received that the Council should increase its target to 31% in order to future proof the policy and make it in-line with current proposed 'Future Homes Standard' which is the proposed next step in Part L of Building Regulations and that this will be feasible for developers to implement through increasing the energy efficiency of the proposed buildings using a 'Fabric First' approach or the provision of on-site renewable and low-carbon technologies.

Other Consultees

The High Weald Advisory Committee make the recommended change to policy wording: '*add a criterion to Policy 37 or 39 "Development proposals should minimise disturbance to soil structure, compaction and avoid sterilising large amounts of it under hard surfacing and should have regard to the Defra publication 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites'*

Object – Policy 37 Climate Change

Number of Comments

42

Summary of Comments

Members of the Public

The majority of objections to this policy stated that the policy does not go far enough, with numerous reasons given, including:

- that 10% renewables is too low and that there should be higher energy efficiency standards on all new builds.
- the plan should be fabric first' with some going as far as saying that all new buildings included in the plan should be carbon neutral by 2050.
- the wording be changed to 'All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations' and that the word 'Major' be removed.
- the plan should include reference to PassivHaus standards and one suggested that the wording "whilst meeting the TER solely from energy efficiency measures as defined within the SAP calculation model' should be added.

One respondent would like to see all references to District hearing removed in favour of heat pumps which can be powered by renewable electricity

Parish Councils

Thakeham Parish Council expressed concern that the policy is not robust enough to meet UK legal commitments with regards to carbon emissions and would like to see policy strengthened further to deliver significant reductions in carbon emissions versus the 2019 baseline, as required by Paris Accord legal agreements. They mentioned that the policy:

- a) have wider scope than residential; all forms of development should be expected to contribute towards carbon reduction, and if that is difficult to require for some use classes, alternative offsetting mechanisms are needed;
- b) 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;
- c) use more directive and measurable language: it is not adequate to be merely “supportive of a range of measures...” to reduce carbon emissions;

Billingshurst Parish Council did not think the policy demonstrated that HDC has taken into account the UK’s legally binding requirements regarding the Paris Agreement and net zero carbon by 2050. They indicated that they would like to see Policy 37 strengthened in light of the recent Court of Appeal judgement on Heathrow's third runway - rather than be 'expected' to demonstrate how schemes will achieve any target they 'must' demonstrate this and the level of scrutiny must be of the highest order, thereby requiring HDC to have enough technical resource to assess proposals and the strength to refuse proposals that fail to meet the appropriate standard, which should be net zero carbon. In terms of Climate Change Adaptation, they suggest the policy must apply to all development and should retain a requirement for developers to explain why adaptation and mitigation measures could not be provided. This should be extended to stating applications will be refused where it is not agreed by HDC that measures could not be provided.

Ashington Parish Council considered that Strategic Policy 37 was not robust enough in its requirements for development to ensure that significant reductions in carbon emissions are achieved compared with the baseline of 2019.

Shipley Parish Council expressed disappointment that the draft Plan contains only modest and un-demanding obligations to climate change. They felt the policy fails to take into consideration:

- the UK’s obligations related to the Paris Agreement;
- the impact of the recent Heathrow Airport appeal on environmental grounds; and
- that strategies relating to environment, climate change and flooding fall short of exemplars in the county e.g. the SDNPA environmental strategies and thresholds could provide a useful comparison for HDC to draw on.

Statutory Consultees

Natural England stated that the Local Plan should identify the ecosystems most vulnerable to climate change within District and identify potential habitats that require water supply and improved water quality to facilitate climate change adaptation. In addition, they were of the view that the Local Plan should seek information to identify habitats that are suitable for climate change adaptation and assess the impacts of the growth on the water quality and supply to these adaptation priority habitats.

They explained that this information can be used to develop mitigation and adaptation policies in their local plans to help with climate change adaptation of water dependant ecosystems and raised the Arun Valley SAC as an example. The point was made that identification of measures to protect the upstream water supply and improve water quality, or at least not hinder its improvement, would aid the climate change adaptation for the Habitats and Species in the Arun Valley.

They advise that in the current climate emergency flooding, drinking water, climatic drying and water resources are of critical importance, we further advise that climate change is considered with reference to the Arun Valley. Identification of measures to protect the upstream water supply and improve water quality, or at least not hinder its improvement, would aid the climate change adaptation for the Habitats and Species in the Arun Valley.

Under the adaptation section and Green Infrastructure, they believe it should specifically cite the need to for an ecosystems services approach to Consider climate change adaptation for habitats and the potential for carbon sequestration through wetland creation. This has clear relevance to the Arun Valley international site and we advise that the importance potential for wetland sites to provide multifunctional purposes for flood storage, carbon sequestration and fore considerations of water quality should form a key component of strategic planning for climate change in Horsham. This has clear links also to strategic solutions to water quality impacts.

Other Consultees

Horsham Cycle Forum stated that more emphasis should be placed on car free developments and suggested the following amendments:

- re-write to bullet point 4 - second sentence to read: "Since transport is the largest sector for carbon emissions, in new developments people should not need to rely on the car for everyday journeys, including getting to workplaces, shops, schools and other facilities, open spaces or the natural environment".
- Re-write 9.7 to read (second sentence): "In addition to this policy, reference should be made to transport policies, reducing reliance on the private car as a main form of transport, minimise the need to travel, and contributing to the electric vehicle network."
- Include in point 9.2 reference to the Feb 2020 Court of Appeal judgement on the Heathrow third runway expansion, where the plans were deemed illegal as they breach the UK's commitments to reduce greenhouse gas emissions to tackle the climate crisis.
- Amend point 4 of carbon reduction section to read: "Using patterns of development which reduce both reliance on the private car as a main form of transport and the need to travel, enable walking and cycling through the design of dense, connected cycle networks and include good accessibility to public transport and other forms of sustainable transport;"

CPRE questioned whether 19% is consistent with government commitment to be zero carbon by 2050 and would like to see the target raised to 30%. They recommended the following amendments:

- Replacing "*Development* proposals are expected to include measures which contribute to achieving zero carbon" with "Development proposals must include measures, which contribute to achieving zero carbon"
- Replacing "Major development proposals will be expected to attain a 19% reduction of the Dwelling Emission Rate" be replaced with "Major development proposals must reduce the Dwelling Emission Rate by at least 19%"
- Replacing "Schemes will be expected to demonstrate how this target will be attained" with "Schemes must demonstrate how this target will be attained"

They also suggest adaption measure 3 be amended to read: “Green infrastructure and dual use Sustainable Urban Drainage Systems (SuDS), including permeable surfaces, to help absorb heat, reduce surface water runoff, provide flood storage capacity and assist habitat migration”

Sussex Wildlife Trust recommend a bulletpoint which includes a requirement for the developer to acknowledge habitats that are important for carbon sequestration and seek to avoid loss to those habitats as per 170(b) of the NPPF. They also suggest adding the following text to the third bullet point under Climate Change adaption ‘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 by creating a connected and functioning landscape*’ as per section 170(d) of the NPPF.

Policy 38

| Support – Policy 38 Appropriate Energy Use | |
|--|---|
| Number of Comments | 8 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>General support for the policy was provided albeit one commented included a request for a change of wording so that the emphasis is on minimising carbon emissions rather than just reducing them and a replacement of the word ‘required’ for ‘expected’.</p> <p><u>Parish/Neighbourhood Councils</u></p> <p>Horsham Trafalgar Neighbourhood Council identified that they agreed with the policy in principle.</p> <p>Crawley Borough Council supported the policy as in their view it correctly identified that district and community energy networks have been identified by the government as key to achieving carbon reduction targets in line with the 2050 net zero target. They also made the comment that:</p> <p>Part g. of the hierarchy appears to exclude the possibility of individual electric heating. It may be appropriate to qualify this provision. Although electric heat has historically been very carbon intensive, updated carbon factors to be incorporated into Building Regulations Part L are expected to reduce the modelled CO2 emissions associated with electric heating to a level comparable to gas, reflecting the increasing decarbonisation of the electricity grid (although electric heat will remain significantly more expensive for consumers). The government’s ‘Future Homes Standard’ consultation document (e.g. para. 2.9.) implies that electric heat is likely to continue to play some limited role – alongside heat pumps and heat networks. It may be preferable to allow electric heating subject to certain additional criteria – e.g. a proportion of electricity demand to be met by on-site generation.</p> | |

| Observation – Policy 38 Appropriate Energy Use | |
|--|----|
| Number of Comments | 14 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Comments were made that paragraph 9.12 was unambitious in the desire for only 10% of energy requirements in major development should be met by renewable and low carbon energy</p> <p><u>Developers/Site Promoters</u></p> <p>A number of comments received expressed that they understood the need to transition to low-carbon energy sources and that their respective development proposals would seek to address this.</p> | |

| Object – Policy 38 Appropriate Energy Use | |
|---|---|
| Number of Comments | 9 |

Summary of Comments

Members of the Public

A number of comments were made that the policy should include higher targets for both domestic and commercial properties.

Parish Councils

Billingshurst Parish Council would like to see the policy strengthened stating the 10% from renewables is too low and the wording should say 'must'.

Developers/Site Promoters

Rydon Homes would like to see more explanation on the concept of Heat Priority Areas and whether electric heating is acceptable.

Policy 39

| Support – Policy 39 Sustainable Design and Construction | |
|---|----|
| Number of Comments | 13 |
| <p>Summary of Comments</p> <p><u>Members of the Public and Community Groups</u></p> <p>The Steyning Society and Rudgwick Preservation Society expressed support.</p> <p><u>Parish Councils</u></p> <p>Horsham Trafalgar Neighbourhood Council support the policy in principle. However, request that the word “must” be amended to “should” throughout the policy text.</p> <p><u>Statutory Bodies</u></p> <p>Crawley Borough Council supported the policy, including the standards proposed. This includes the water efficiency requirement of 100 litres/person/day, which the Council consider to be justified by the water stress in the wider area. However, it is considered that the significant scale of the major strategic sites in the Plan should enable the policy requirements to go further and seek to meet 80lpd. Crawley Borough Council welcomed the support of Horsham District Council in continuing to promote the issues raised in the jointly commissioned Water Cycle Study.</p> <p>The Environment Agency states that it supports the sustainable design and construction requirements within this policy, in particular the specific requirements for non-domestic floorspace to incorporate water efficiency and for new dwellings to limit water use to 100 litres/person/day. It is a clear aspiration which builds on the tighter Building Regulations standard of 110 litres/person/day in areas at water stress, and mirrors the commitment set out by Southern Water in their “Target 100” objective. It is recommended that specific recommendations from the Gatwick Diamond Water Cycle Study are considered here as to whether more specific detail is required with consideration to set stronger requirements for larger scale development.</p> <p><u>Other Consultees</u></p> <p>Horsham Labour Party indicated broad support of the policy. However, the party also consider that all new development (where practical) should be subject to minimum standards for additional tree planting with suitable native species, both to serve as a CO₂ and to assist with ground water absorption. All new development should also, as far as practical, provide extensive water storage facilities to reduce surface run-off during periods of heavy rainfall and to supplement the mains supply during times of shortage.</p> <p>The Sussex Wildlife Trust stated that it was pleased to see a clear bullet point that recognises the need for development to incorporate measures that enhance biodiversity, as per section 174 of the NPPF.</p> | |

| Observation – Policy 39 Sustainable Design and Construction | |
|---|----|
| Number of Comments | 21 |

Summary of Comments

Members of the Public and Community Groups

A number of comments received related to the proposed strategic allocations being contradictory to this policy or querying whether the policy would apply to such schemes.

Other comments included:

- The policy should insist on environmental improvements in the fabric of new housing with particular materials, such as hemp cret mentioned.
- New developments should include solar panels rather than individual homeowners having to retrofit.
- Dwellings should be built with rain storage / recycling provision.
- BREEAM does not cover residential development. Propose that a condition should be included on decision notice of approved application making it a requirement that residential development must achieve a specified BRE Home Quality Mark (HQM) rating.
- For every hectare of green field lost, a calculation should be made to absorb rain water and grey water run-off.
- All new homes should be carbon neutral/ renewable energy sources included in new development.
- Ensure construction plans take account of best practice, including; water provision, grey water, PV electricity generation and water run-off.

The Horsham Society questioned whether EV chargers be powerful enough or whether there will be sufficient capacity for all cars being electric. The society also suggested that a change should be made under the historic buildings heading to read "Traditional and historic buildings (Nationally and Locally Listed) should be retrofitted to reduce emissions in a manner that fully respects the character of the building and does not obscure historic features. There will be support for approval when sensitive reuse or repurposing is proposed, that extend the life and preserve and respect the historical character and structure"

Parish Councils

Ashington Parish Council stated that the policy should be part of the strategic policy framework

Developers/Site Promoters

Comments included:

- Provision of high speed broadband is a matter for the relevant service provider and does not lie within the remit of developers. All a developer can do is facilitate the connection to new buildings as far as possible. Request that this is made clear in the wording of the policy.
- Cost implications of achieving BREEAM rating must be considered from a viability perspective.

Other Consultees

The High Weald Joint Advisory Committee recommended an additional criterion within "Development proposals should minimise disturbance to soil structure, compaction and avoid sterilising large amounts of it under hard surfacing and should have regard to the Defra publication 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites'."

| Object – Policy 39 Sustainable Design and Construction | |
|---|----|
| Number of Comments | 14 |
| Summary of Comments | |
| <p><u>Members of the Public</u></p> <p>Comments included:</p> <ul style="list-style-type: none"> - Ensure renewable energy initiatives are be built in; all buildings to have solar panels or a non-carbon energy source appropriate to technology at time of build, storage batteries to fully utilise the non-carbon energy source, no gas or carbon energy sources included, electric vehicle charging points to be provided for all dwellings and/or parking spaces. - Consider energy from all natural sources; wind, water and sun. - Ensure proposals are carbon neutral both in construction and in the life of any new development. - In order to meet statutory targets all existing housing stock will need to be retrofitted with energy improvements. - Insist on high speed cable broadband and fast 4G / 5G coverage in all sites. - Remove “where appropriate” from opening text. - Amend criterion e) to state “All development should have access to public transport, defined as a bus or train service that runs at least every 20 minutes during working hours with a service at least hourly during evenings and weekends. If this is not possible then for development of over 20 properties the developer must provide an electric car pool of adequate size;” - Amend criterion entitled ‘Historic Buildings’ to state that it must also comply with Energy Efficiency and Historic Buildings published by Historic England. <p><u>Parish Councils</u></p> <p>Billingshurst Parish Council request that omitted wording (as stated in the HDPF) ‘design measures to minimise vulnerability to flooding and heatwave events’ and ‘designed to encourage the use of natural lighting and ventilation’ be reinstated.</p> <p><u>Developers/Site Promoters</u></p> <p>Comments included:</p> <ul style="list-style-type: none"> - Amend criterion a) to enhance effectiveness of policy wording – “Development should minimise <u>energy used through construction</u>, <u>minimise embodied energy in materials chosen</u>, and <u>minimise construction</u> and demolition waste and utilise recycled and low-impact materials;” - Request flexibility in the policy so that it does not apply to non-residential construction within a residential development. If developers look to provide an element of flexible office/employment space through a community facility as part of their developments through initiatives such as community-owned co-working space, the BREEAM ‘Very Good’ criteria would cause issues as the residential and commercial elements would be required to operate as two separate sites with separate deliveries and waste arrangements. | |

Policy 40

| Support – Policy 40 Flooding | |
|---|----|
| Number of Comments | 10 |
| Summary of Comments <u>Members of the Public</u> Comments were received that agreed that this policy should be pivotal when deciding where future development is sited. A comment was received which supported the policy but expressed concern about its enforcement and use. <u>Community Groups</u> Rudgwick Preservation Society and the Steyning Society indicated support. <u>Developers/Site Promoters</u> Comments were received in support from those promoting sites highlighting how their proposed developments would accord with the draft approach. | |

| Observation – Policy 40 Flooding | |
|--|----|
| Number of Comments | 24 |
| Summary of Comments <u>Members of the Public</u> A number of comments requested proof or queried the effectiveness of current/proposed flood - mitigation. Other comments made included: <ul style="list-style-type: none"> - Whether SuDS was viable on Wealden clay. - Houses near/within flood risk areas remain unsold. - Further reassurance was needed that flooding had been or will be fully considered. - High river levels were recorded in various parts of the district. - Development needs to be prioritised in areas not at flood risk. - Surface water needs to be managed to avoid impacting upon roads. <u>Parish Councils</u> Horsham Denne Neighbourhood Council felt that the SFRA undertaken in support of the policy may be out of date as it was not able to consider flood events in the winter of 2019/20. | |

| Object – Policy 40 Flooding | |
|--|----|
| Number of Comments | 36 |
| Summary of Comments <u>Members of the Public and Community Groups</u> A number of comments were made regarding flooding on potential allocations or pointing to recent flood events. Some comments also made reference to development causing flooding both near to and further downstream from sites, due to loss of trees and coverage with impermeable | |

surfaces. A number of comments also pointed to the characteristics of the district meaning that flooding was a key issue, with soil type (clay) and watercourses (Adur, Arun) referenced.

Other comments received included:

- Indicative maps produced by the Environment Agency do not show the full extent of flooding
- Flooding risk will increase due to climate change and sea level rises and the Plan needs to account for this. No development should be placed in areas that will be at risk of flooding in the future.
- SuDS are not as successful in dealing with flooding than the natural environment.
- Flood mitigation is not maintained properly and/or properly integrated into development schemes.
- The government/local authorities need to strengthen flooding regulations.
- Reservoirs are needed to reduce flood risk in the district and manage drought.
- Flooding will impact existing residents.

Parish/Neighbourhood Councils

A number of Parish/Neighbourhood Councils, including Billingshurst, Shermanbury, Upper Beeding, Bramber and Forest expressed concern about the policy. Some of the responses were similar in nature and many covered issues described by members of the public and community groups. Comments included:

- The policy should be more robust by requiring Management Plans for SuDS to ensure that they are maintained after installation.
- The concerns about flooding is real and that flood events have occurred and/or are likely to occur with mitigation in their areas.
- Regard has not been had to flooding that occurred in winter 2019/20.
- Existing flood risk and catchment plans should be updated.

Statutory Consultees

Thames Water commented that:

- Flood risk sustainability objectives should accept that water and sewerage infrastructure development may be necessary in flood risk areas.
- Flood risk policies should make reference to 'sewer flooding'. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. TW request that the following paragraph should be included: *"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."*

Other Consultees

The Woodland Trust suggested an addition that supported the design and delivery of natural flood management schemes as part of the wider contribution towards environmental net gain. They explained the necessity for this as natural flood management techniques make an important contribution by helping slow and store water upstream, in order to reduce flooding downstream. In addition to flood protection, natural flood management provides multiple biodiversity enhancements and natural capital benefits. A positive example is the Sussex Flow Initiative in the river Ouse catchment.

Horsham Labour Party commented that an additional policy should require new developments, as far as practical, to provide extensive water storage facilities to reduce surface run-off during periods of heavy rainfall and to supplement the mains supply during times of shortage.

Policy 41

| Support – Policy 41 | |
|---|----|
| Number of Comments | 20 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Members of the Public made the comments in support of the policy or that supported the provision and maintenance of new infrastructure in general. A number commented expressing that existing infrastructure is currently inadequate and/or acknowledging that there are challenges to provide infrastructure.</p> <p>Horsham Labour Party expressed support for the policy, but stated that:</p> <ul style="list-style-type: none"> - Designers of new development should be required to demonstrate the potential of their projects to contribute surplus electrical energy back to the national grid - All sizeable developments (500+ dwellings) should have a local district centre providing a range of facilities, including convenience shops, health care, youth clubs, play spaces, pubs and other leisure facilities. - It should be recognised that some level of public subsidy, particularly in the early years, could be required to support the facilities - Sustainable development requires a properly funded, quality local bus service and Local Plans should include a commitment to reverse cuts to these services in recent years - Developments near to urban areas with good PTAL (Public Transport Accessibility Level) should be constructed as 'car-free' or 'car-reduced' - The Local Plan should comment further on Community Transport Services <p>Wimblehurst Road Residents Association also expressed support but felt that it needed to ensure statements are definitive and met, not just aspirational. The expressed that infrastructure delivery should be at the start of development, not the end, particularly as increased pressure on the District from housing increases the strain on roads, health facilities and educational facilities.</p> <p><u>Parish/Neighbourhood Councils</u></p> <p>Horsham Trafalgar Neighbourhood Council, Rudgwick Parish Council and Shermanbury Parish Councils expressed support for the policy, with some comments explaining the importance of infrastructure and that it is planned in advance of development. support the draft policies in Chapter 10: Infrastructure, Transport and Healthy Communities.</p> <p><u>Statutory Consultees</u></p> <p>Crawley Borough Council supported Policy 41 but believes that its effectiveness could be improved by making provision in relation to proposals for new infrastructure facilities and outlining what needs to be met, particularly for schemes that respond to the cumulative needs created by development that infrastructure providers may seek to promote. CBC also consider that this Policy should make reference to <i>"including infrastructure improvements beyond the District's boundaries, where these are required as a result of development within Horsham."</i></p> <p><u>Site Promoters</u></p> <p>A number of site promoters indicated support for the policy and identified how their proposals would meet policy requirements.</p> | |

| | |
|---|-----------|
| Observation – Policy 41 | |
| Number of Comments | 81 |
| Summary of Comments | |
| <u>Members of the Public and community groups</u> | |
| <p>Members of the public and community groups raised many concerns about the provision of services and facilities within the District, particularly (but not limited to) issues such as transport, education, healthcare including dental services and community and leisure facilities. A number of such comments are captured in respective summaries of specific types of infrastructure</p> <p>Comments were also made in relation to the impact that specific developments or potential allocations would have on nearby localities and existing residents and/or that proposed development should provide specified pieces of infrastructure in order for the district to accommodate development. Some comments suggested that punishments in the forms of fines or refusal of planning applications should be enforced to prevent developers failing to provide necessary infrastructure. A number of comments referenced the need to frontload infrastructure provision to reduce negative impacts.</p> <p>Comments were brought up with regards to enforcement/ensuring that developers provide promised infrastructure and/or ensure that they are properly maintained. A number of people commented on the current level of infrastructure provision and maintenance (for instance, bus services and pavements).</p> <p>There were comments stating that an infrastructure assessment/audit should be done by the Council to support the Local Plan with some suggesting that this should be done independently and funded by developers.</p> | |
| <u>Parish Councils</u> | |
| <p>Horsham Denne Neighbourhood Council highlighted the importance to the public that infrastructure promises are kept, citing that the Highwood bus service and Wickhurst Green health facilities were not delivered.</p> <p>Horsham Trafalgar Neighbourhood Council considered that the provision of infrastructure presents challenges, commented that new settlements offer the potential to deliver infrastructure without impacting existing provision, however they would need to deliver sufficient critical mass and scale to ensure self-sufficiency and sustainability.</p> | |
| <u>Statutory Consultees</u> | |
| <p>West Sussex County Council made specific comments regarding the introductory text to Chapter 10 on p.159, highlighting corrections and additions to SEND and Alternative Provision.</p> <p>Horsham & Mid Sussex Clinical Commissioning Group (CCG) acknowledged the requirements from Government to increase house building in the area to 2036. 15,000-19,000 new homes transcribes to 37,500-47,500 new patients which will need to be part of the CCG's forward planning model which will be challenging for the CCG. Particularly as some GP practices would require alterations to buildings to accommodate new patients. Therefore Horsham & Mid Sussex CCG would hope to work closely in partnership with HDC regarding CIL funding for healthcare capital infrastructure</p> | |

projects. In the CCG's experience, it is disappointing the level of time it takes to build up CIL funds for distribution and it seems a retrograde step.

Site Promoters

A number of site promoters indicated that site that they sought to develop were well located in relation to infrastructure. Other comments from site promoters included:

- The Council needs to properly plan for the infrastructure needs of the community and to plan and promote expansion and reinforcement
- Infrastructure can only be sought that is directly related to the development.
- Development should be prioritise where good infrastructure exists or there are opportunities for their improvement.

Other Stakeholders

The British Horse Society highlighted that new development brings opportunities to solve existing infrastructure problems in the Public Rights of Way network and wording should be added regarding the need to provide infrastructure to improve routes through the creation of links in the network.

The Department for Education made the following summarised comments:

- The DfE welcomes reference within the Plan to support the development of appropriate social and community infrastructure at the introduction to Chapter 10
- In accordance with the NPPF local planning authorities should ensure a sufficient choice of school places
- In accordance with Planning Practice Guidance and the Planning for Schools Development land should be safeguarded for future expansion of new schools.
- The DfE supports the approach set out in Policy 41 but would also suggest including reference to ensuring that the relevant evidence base is kept up-to-date to identify the infrastructure requirements and funding secured/outstanding.
- The next version of the Local Plan should seek to identify specific sites (existing or new) which can deliver the school places needed to support growth
- In accordance with the PPG, there should be an initial assumption that applicable developments will provide both land and funding for the construction of new schools
- The DfE recommends that in the next version of the Local Plan the requirements for developer contributions to existing schools and the provision of new schools for any particular site will be confirmed at application stage and the requirements to deliver schools on some sites could change in future
- The Council should set out education infrastructure requirements for the Plan period within an Infrastructure Funding Statement
- The revised CIL Regulations allow unlimited pooling of developer contributions, thereby increasing transparency for all stakeholders and increasing certainty that developer contributions will be used to fund the new school places that are needed.
- The DfE request a reference within the Local Plan's Policies or supporting text to explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects e.g. local authority's expansion of a secondary school to support development coming forward.

The South East Climate Alliance considered that a new criterion 4 should be added to Policy 41 that requires new infrastructure to take account of the UK Government's commitment to cut carbon emissions to net zero by 2050.

Object – Policy 41

Number of Comments

103

Summary of Comments

Members of the Public and community groups

As with comments referenced in the observations summary, members of the public and community groups raised a number of comments about existing or expected infrastructure issues caused entirely or in part by development. There was a mix between general concerns or specific concerns based on particular localities and/or related to specific sites. Issues covered in responses included (but were not limited to) healthcare capacity (particularly in relation to GP capacity and lack of local A&E services), education, transport and commuting, flood and drainage, parks and open spaces, policing, broadband and community facilities such as where groups can meet.

A number of comments explained why they felt that particular sites should not be allocated due to infrastructure concerns. This included both strategic sites as well as potential small site allocations. Some felt that sites should not be allocated if they did not have access to specific pieces of infrastructure – e.g. a railway station.

Very few comments referred to the policy though some comments expressed disappointment that authorities hadn't ensured the delivery of infrastructure in the past and/or the Local Plan/HDC should prevent this in the future. Some comments also discussed changing Government spending priorities (i.e. to level up the north) and that the Council were not responsible for infrastructure delivery or its funding.

Parish Councils

A large number of Parish Councils made comments on infrastructure issues and in particular, infrastructure problems in their respective localities. Issues relating to transport, education and healthcare were particularly common. A number of such comments were made in the context to explain why a potential strategic site would not be appropriate or why growth could not be demonstrated and these are reflected in relevant summaries.

Other comments included:

- The Local Plan/the policy is not adequately supported by infrastructure evidence.
- There is a lack of joined up thinking between infrastructure providers and the Local Plan.
- The policy does not set out how it will influence infrastructure providers.
- The Local Plan only considers smaller infrastructure types but not things such as major roads or hospitals.
- The development strategy should reflect infrastructure capacity.
- Infrastructure should be considered in the Local Plan rather than during an application – as suggested in paragraph 10.4.

Statutory Consultees

Natural England referenced paragraph 10.4 and highlights that it has provided information regarding ongoing assessment of the potential impact of water quality deterioration on the Arun Valley SAC, SPA and Ramsar. This information is provided in the accompanying HRA assessment and has potential implications on the timings of allocations coming forward should the International site fail its water quality objectives.

Southern Water stated that:

- They consider that Policy 41 is not sound as it is not effective or consistent with National Policy, although it supports, in principle, the intention to phase development in relation to the delivery of infrastructure.
- They support criterion 2 of the draft policy which is aimed at mitigating the risk of foul flooding. This is in line with paragraphs 157 and 109 of the NPPF.
- Paragraph 177 of the NPPF also outlines that it is important to ensure that planned infrastructure is delivered in a timely fashion.
- Over the life time of the Local Plan, Southern Water may need to deliver improvements to, or new, strategic infrastructure, and/or stricter water quality objectives. Therefore they look to Local Plan policies to support water companies' plans to deliver such infrastructure at a strategic level as well as support for phased delivery at a local level. Failure to do so could result in overloading of the Waste.
- They have limited powers to prevent connections to the sewerage network, therefore planning policies and conditions play an important role in ensuring that development is co-ordinated with the provision of necessary infrastructure
- Southern Water also highlights page 8 of the National Policy Statement for Wastewater and Paragraph 20 of the NPPF.
- Southern Water proposed the following additions to the policy;
 - o *"4. The capacity of the local sewerage treatment works will need to be considered in the master planning of strategic sites and may require phasing of development*
 - o *5. Proposals by service providers for the delivery of new or improved wastewater infrastructure will normally be permitted, subject to other policies in the development plan"*

Thames Water comments that it supports Policy 41 in principle, but considers that there should be specific mention in the Policy to wastewater/sewerage infrastructure suggesting the following wording *"The Local Planning Authority will seek to ensure that there is adequate water and wastewater/sewerage infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."*

Site Promoters/Developers

Comments included

- Within the policy or the supporting text, reference should be made to the test/regulations which must be met in relation to securing planning obligations (refer to paragraph 56 of the NPPF)
- HDC should help ensure the delivery and availability of a range of social infrastructure, including places of worship

- There is a pressing need for appropriate sites for independent primary and secondary schools
- There is a requirement for additional care homes plus suitable sites for use as burial grounds to serve the faith community

Other Stakeholders

NHS Property Services Ltd (NHSPS) advise that its role is to support CCGs and Sustainability and Transformation Plan (STP) groups to consider the ways the local health and public estate can be put to better use. NHSPS highlights that the NHS requires flexibility in its estate, in the face of financial pressures and that an essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing).

Sussex Wildlife Trust considers that the supportive text for Policy 41 fails to convey the importance of the natural environment as infrastructure and suggest that section 10.1 is amended to reflect this as follows *“10.1 Infrastructure is a wide term and is used to refer to a range of services **which can be both natural and manmade** such as roads, railways, public transport water supplies, electricity, education and healthcare facilities, and sport and recreation, **high quality accessible open space** and other community facilities. The delivery of this infrastructure is fundamental to developing great places to live that are self-sustaining communities.”*

Policy 42

| Support – Policy 42 Sustainable Transport | |
|---|----|
| Number of Comments | 16 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>General support for the policy and for Chapter 10 were expressed albeit some commentators said that changes are needed – including to consider the needs of certain walkers like the elderly, young children and those with animals. There was specific support for the inclusion of horse riders (bullet point 1) and public rights of way (bullet point 3).</p> <p>The West Sussex Access Forum supported the policy but suggested that all routes should be available to all Non-Motorised Users (MNUs) (walkers, cyclists, equestrians and the disabled). They explained that NMU use for leisure is the “gateway” to utility use (which reduces car use). Integration and connectivity with the wider network of routes, including public rights of way is essential and strongly supported.</p> <p>Sport England expressed support for the policy.</p> <p><u>Parish/Neighbourhood Councils</u></p> <p>Shermanbury PC and Horsham Trafalgar Neighbourhood Council expressed support.</p> | |

| Observation – Policy 42 Sustainable Transport | |
|--|----|
| Number of Comments | 94 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>There were a number of comments made which raised concerns on the general impact of the amount of development across the district on transport infrastructure, as well as concerns over the impact of development in certain settlements, including lack of sustainable choices (e.g. station is a long way away, lack of village/nearby services, etc.), and requests for more measures and investment to enable and facilitate public transport. These concerns have also been raised against settlement specific policies and site allocations, and are not repeated in detail here.</p> <p>There were a number of other comments which references to particular transport proposals – that faster trains/buses are needed, particular bypasses are required, particular cycle paths are needed, improvements for pedestrians and horses are needed, slower speed limits should be applied, and that new railway stations are required.</p> <p>Other comments included:</p> <ul style="list-style-type: none"> - The policy is too woolly - Non-car travel is impractical / unrealistic in rural areas of the District - Reference should be made to the West Sussex Cycling Strategy – need dense, connected cycle network - Cycle parking should be as convenient as car parking as set out in the Manual for Streets - The policy should refer to the benefits and advantages of cycling. - Should include acknowledgement of the benefits of a connected multi-use network of PRowS | |

- Smaller scale development will struggle to meet all of the policy criteria
- Queries about whether public transport had been approved
- Policy must ensure that it does not discriminate against women
- Roll out of electric vehicles is impractical due to lack of nationwide charging points
- There is a lack of assessment of cumulative impact of development together with neighbouring authorities
- A reference to the Local Cycling and Walking Infrastructure Plan (LCWIP) should be included.

The British Horse Society suggested that para 10.10 include reference to the fact that walking and cycling strategies are inclusive of the needs of a variety of users and so differing needs of users will be recognised in the design of routes.

Parish Councils

Pulborough Parish Council highlighted pinch points and issues on the roads running through the village and concern over impact of increases in traffic.

Statutory Consultees

South Downs National Park Authority explained that where development may increase travel through the SDNP, reference should be made to the document 'Roads in the South Downs'. They encourage improvement of PRow links into the SDNP.

Sports England were of the view that there should be policy criteria to give priority to pedestrians & cyclists in design, and encourage using patterns of development that reduce the need to travel and prioritise walking, cycling and public transport.

Historic England expressed that they would like to know how new roads and transport infrastructure would be delivered in a manner which conserves the historic environment. They suggest sustainable transport initiatives could provide related opportunities for heritage through improving street/ traffic management and public realm enhancement.

Object – Policy 42 Sustainable Transport

Number of Comments

86

Summary of Comments

Members of the Public

General consensus that there needs to be a greater focus on reducing private car use and more emphasis on devising a walking / cycle network and/ or integrated travel plan with WSCC. There was also agreement on a need to address the lack of amenities and poor transport connections – particularly with regards to the new settlements. A number of comments suggested that particular development proposals should not be pursued on transport grounds.

A few comments suggested that greater weight and focus should be given to the public rights of way network. There were also comments requesting a railway link between London and Chichester to reduce pressure on the roads.

Four specific requests were made for the document to link to the LCWIP (Local Cycle and Walking Infrastructure Plan) – explaining how developments will contribute to further improving the routes set out in the LCWIP.

There was an observation that there is no reference to ‘commuting’ in the transport section even though the document begins with the acknowledgement that 40% of the population commute externally on a daily basis.

Sussex Wildlife Trust proposed an amendment to point 9 of the policy in order to ensure new residence pursue a modal shift straight away: *‘9. Ensures that sustainable modes of transport required for the delivery of the development are in place and operational prior to first occupation’.*

Horsham District Cycling Forum would like to see the focus of the policy changed to highlight sustainable travel benefits. They felt that there was too much emphasis on car dependency within the supporting text and that paragraphs on the benefits of cycling should be added – including reference to the Local Cycle and Walking Infrastructure Plan (LCWIP) and that a paragraph was needed explaining the principles needed to provide an adequate cycle network. They felt that strategic developments should be required to develop a cycling strategy in consultation with local stakeholders.

They identified two statements needing correction, explaining:

- Only 11.8% of the district's households (NOT residents) didn't own a car
- There are eight stations in Horsham District. Warnham station has been left out.

Parish Councils

A number of objections were made by Parish/ Neighbourhood Councils. They often referred to transport infrastructure deficits in the district as a whole or in areas that they represent. Some commented that poor public transport meant that growth or strategic development should not occur in particular locations and/or that development should be located where there was modal choice. Some referred to examples of recent schemes (for example, Kilnwood Vale), which they felt were insufficient in relation to sustainable transport modes.

Some comments felt that the policy needed to be stronger and identify particular transport projects that were planned to ensure the policy was more effective and proactive. A comment was made that the transport infrastructure should be appropriate in scale to existing transport infrastructure and comments received felt the policy should more strongly refer to the need for transport infrastructure to be part of an integrated network to make public transport more attractive.

Policy 43

| Support – Policy 43 Parking | |
|--|---|
| Number of Comments | 8 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u> There was some support for the policy, though it was commented that the timing of parking provision was important.</p> <p><u>Parish Councils</u> Horsham Trafalgar Neighbourhood Council expressed support.</p> <p><u>Developers/Site Promoters</u> Some developers commented that their proposals would accord with the draft policy.</p> <p><u>Other Organisations</u> Gatwick Airport Ltd expressed support for the policy and explain there is no foreseeable need for new off airport parking to be provided in Horsham, pointing to a parking strategy and plans to meet forecast increases in parking demand on airport. They explain that wording could be strengthened further such that the policy on off airport parking is set out in more unequivocal terms as follows: <i>“Proposals for additional or replacement airport related parking, including long and short term parking for passenger vehicles, will not be permitted.”</i></p> | |

| Observation – Policy 43 Parking | |
|---|----|
| Number of Comments | 14 |
| <p>Summary of Comments</p> <p><u>Members of the Public</u> A number of comments referred to parking difficulties in different parts of the district, particularly in areas where car ownership and use is high and issues around permits. Others commented that parking provision needs to be realistic rather than designed to encourage other transport modes. Improvements to town centre parking and increases to park and ride facilities were also mentioned.</p> <p><u>Community Groups</u> Horsham District Cycling Forum commented that cycle parking should be covered in this policy and made the following points:</p> <ul style="list-style-type: none"> - This policy should be renamed ‘Car and cycle parking’. - Surveys have shown that cycle parking delivers five times the retail spend per square meter than the same area of car parking. - Paragraph 10.17: add ‘sufficient car and cycle parking’ in second sentence; amend fourth sentence to read ‘The number of car and cycle parking spaces’ - Add new paragraph as follows: “It is also important that sensible access to cycle parking is provided so that bikes can be ridden right up to the cycle parking.” <p>Horsham Society commented that adequate cycle and vehicle parking should be seen as a core principle, not an afterthought NPPF requires “priority first”. They proposed a rewriting to 43.2 to read:</p> | |

- *“Consideration should be given as priority to the needs of cycle parking, motorcycle parking, and vehicles for the mobility impaired. Adequate parking and facilities must be provided within developments to meet the needs of anticipated users”*

Parish/Neighbourhood Councils

Forest Neighbourhood Council opined that HDC should review its town centre car parking policies to encourage casual access to shops.

Developers

A comment was made that it was not clear that the Council had adopted WSCC parking standards.

Object – Policy 43 Parking

Number of Comments

16

Summary of Comments

Members of the Public

A number of comments were made. A number felt that parking provision was too low in new developments, although alternative views – that car free development should be sought or that parking encouraged car use – was also made. A number of comments were made relating to parking around railway stations, schools, retail, employment, etc. was necessary and that the policy did not refer to particular provision that would be provided or increased.

Comments were expressed that lobbying of Government/County Council was needed to address parking issues and that the policy should be amended so that every parking space has plug in charging facilities.

Community Groups

Greening Steyning: This section on Parking has some good elements (e.g. on electric car charging) but seems stuck in the present. This section needs recasting to reflect the big changes coming in how people get around in response to emissions targets. It needs to be radical and forward looking, not incremental.

Parish/ Neighbourhood Councils

Slaugham Parish Council commented that when there's too few parking spaces it causes unrest between neighbours within recent housing developments. They noted that residents cannot park close to their homes; emergency vehicles and the bin men cannot always get through the narrow roadways. They continued by explaining that vehicles park on the pavements and pedestrians have to walk on the road and opined that separate communal car parking areas don't work because car owners are afraid of vandalism. They asked whether it will be possible to provide an adequate number of charging points for cars? The explained that discrimination against vans parking on the new estates should not happen when their owners/drivers may need vans for work.

Forest Neighbourhood Council pointed to parking issues at railway stations and were also of the view that HDC needs to revise its approach to car parking in Horsham Town Centre if the retail economy is to be supported. Short term parking should be free to encourage shoppers.

Ashington Parish Council also commented on parking limitations at nearby railway stations.

Developer/Site Promoter

An objection was submitted that objected to wording of criteria 5 on airport parking. They were of the view that the policy must include criteria against which future applications for airport parking can be measured and that no definition is provided as to what would constitute an appropriate or realistic alternative.

Other Consultees

Horsham Labour Party commented that to minimise car-borne commuting and peak hours congestion, parking provision for places of employment should be subject to maximum standards that relate to public transport accessibility levels (PTAL). Car free/car reduced housing should be encouraged in areas with good public transport accessibility levels, through the application of maximum residential parking standards, supported as necessary by appropriate on-street controls. (A legal agreement to withdraw CPZ permit entitlement to incoming residents may be necessary to mitigate the impact of new parking pressures on the incumbent community.) The policy should also be amended to include the provision of plug-in charging facilities for all new residential parking spaces.

Policy 44

| Support – Policy 44 Gatwick Airport Safeguarded Land | |
|--|---|
| Number of Comments | 8 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Comments made in support of the policy, or in support of Gatwick Airport in general mentioned that airport needs to expand or the area will stagnate.</p> <p><u>Parish Council</u></p> <p>Horsham Trafalgar Neighbourhood Council expressed support</p> <p><u>Other Consultees</u></p> <p>Gatwick Airport Ltd supported the inclusion of this policy but also suggests that:</p> <ul style="list-style-type: none"> - The wording “<i>Where appropriate, planning permission may be granted on a temporary basis.</i>” should be deleted from criterion 2. - Given experiences with Crawley Borough’s GAT2 policy that allows for temporary development, developers have sought to exploit this provision proposing sizeable temporary developments - Large-scale temporary development would give rise to an unsustainable use of resources and development that potentially adds to the complexity of bringing forward airport development (e.g. access issues, risk to the acquisition of the land (incurring time and costs) and potential additional costs and lengthier timeframe in dealing with the state of the land (with a vacated temporary use) <p>They also commented that Gatwick Airport Ltd (GAL) considers that a policy on aerodrome safeguarding should be included in the Local Plan, particularly in view of the importance of aerodrome safeguarding and the extent of Horsham District affected by aerodrome safeguarding for the airport. GAL has proposed specific policy wording, which has also been recommended to Crawley and Mole Valley local authorities as part of their local plan reviews.</p> <p>Horsham Labour Party expressed support.</p> | |

| Observation – Policy 44 Gatwick Airport Safeguarded Land | |
|---|---|
| Number of Comments | 5 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Ifield Society considered that in all scenarios, housing developments should not be built near airports. Ifield Society also suggested that uncertainty surrounding the possibility of a second runway at Gatwick may impact on the deliverability or routing of the proposed Western Relief Road.</p> <p><u>Statutory Consultees</u></p> | |

Crawley Borough Council stated that they understood why the Council has continued to safeguard the small area of land in Horsham and recognise the request in the recent representation on CBC's Regulation 19 that this is referenced to ensure a consistent approach between the AAP and the safeguarding policy going forward. This will need further discussion should CBC choose to progress with an AAP and should it be determined that land is no longer required for airport expansion south of the airport, it would be pointless to safeguard land in Horsham District.

Other Consultees

Greening Steyning/South East Climate Alliance considered that the recent High Court judgment regarding Heathrow Expansion and the uncertainty of the airline industry should be reflected in the supporting text and it shouldn't be taken for granted that continued expansion will be acceptable.

Woodland Trust considers that the policy should ensure that no areas of ancient woods and trees are including in the land safeguarded for future airport development.

Object – Policy 44 Gatwick Airport Safeguarded Land

Number of Comments

6

Summary of Comments

Members of the Public and community groups

A number of individuals raised the following concerns regarding Policy 44:

- Given the recent Heathrow decision and concerns regarding the environment, there should be no expansion of Gatwick Airport in any form
- There should be more focus on renewable and green industries, not solely focusing economic growth on Gatwick Airport
- The safeguarding should be removed and housing built in this location which has good transport links, rather than in Southwater and Horsham, which have poor transport links and limited employment prospects

Developers/Site Promoters

Homes England, as site promoter for the West of Crawley site, recommends that the wording of Policy 44 is updated to directly reference Crawley Borough Council's Regulation 19 Local Plan Strategic Policy SD3: North Crawley Area Action Plan, which acknowledges there is no robust evidence that justifies continued safeguarding of the land. As part of the Duty to Co-operate the Council should ensure that the land is appropriately considered to ensure the draft Local Plan is positively prepared.

Other Consultees

Sussex Wildlife Trust expressed surprise of the inclusion of the Policy, given that it appears to be in contradiction to the policy approach in the proposed submission Crawley Local Plan (Regulation 19). Sussex Wildlife Trust would hope that the two local planning authorities are working together to address the future of the area and the cross boundary issues.

Policy 45

| Support – Policy 45 | |
|--|---|
| Number of Comments | 8 |
| Summary of Comments <u>Members of the Public and community groups</u> <p>There were very comments that made specific comments on the policy.</p> <p>Horsham District Scouts expressed support for the provision of new community facilities and Horsham Labour Party broadly supported the policy.</p> <p><u>Parish Councils</u></p> <p>Horsham Trafalgar Neighbourhood Council expressed support.</p> <p><u>Developers/Site Promoters</u></p> <p>A number of comments indicated support for the policy and those promoting sites identified how their proposal accorded with the requirements.</p> | |

| Observations – Policy 45 | |
|--|----|
| Number of Comments | 14 |
| Summary of Comments <u>Members of the Public and community groups</u> <p>Individual comments referred to the following:</p> <ul style="list-style-type: none"> - The need for healthcare facilities (particularly an easily accessible hospital) in order to meet the needs of the area's ageing population - The need for school provision to meet the needs of younger people - The potential for the plan to have significant cumulative, negative impacts on the health and wellbeing of residents <p>Ifield Golf Club commented on the relationship of the policy with the potential West of Crawley strategic site allocation. They noted the potential loss of a facilities targeted at over 65s in relation to the policy, and more generally on the conflict between point 7 of the policy, pointing out that strategic development may impact community facilities.</p> <p>Horsham District Cycling Forum suggested the addition of specific references to cycling infrastructure and its positive impact on health and inclusivity.</p> <p>The British Horse Society and Sussex Area Ramblers both stressed the importance of informal, easy access to the countryside with regards to mental and physical health and wellbeing.</p> <p><u>Parish Councils</u></p> <p>Pulborough Parish Council commented that although there are references to healthy communities in the plan there is insufficient acknowledgement of this in all parts of the document.</p> | |

Statutory Consultees

West Sussex County Council highlighted the following:

- Extra care housing (C3) should be prioritised over Care Homes (C2) in order to promote independence into later life
- The need for housing for those with Lifelong disabilities which should be accommodated within larger strategic sites
- The requirement for local authorities to improve and protect health and wellbeing under the Health and Social Care Act 2012

They recommended that the policy make reference to the West Sussex Joint Health and Wellbeing Strategy and Sustainability Transformation Plans, as well as the Horsham Local Authority Health Profile. WSCC also suggested the addition of a policy requirement for a formal HIA to be submitted with planning applications.

Horsham and Mid Sussex CCG note the potential for between 15,000 and 19,000 new patients within the Horsham areas and the need for close working between HDC and the CCG to ensure funding for required improvement projects to meet the increased need. They highlight the increased demand to be placed on existing healthcare facilities and the need for HDC and the CCG to work together to secure appropriate funding through S106.

Object – Policy 45

Number of Comments

10

Summary of Comments

Members of the Public and community groups

Comments from individuals focused on the following:

- Inadequate focus on increasing healthcare facilities, particularly local hospital/A&E provision – Local Plan policies should explicitly require a new hospital
- The fact that strategic development in the district may be at the detriment of inclusive, healthy communities, particularly which do not sufficiently address the needs of an ageing population or those with disabilities
- The need for a more focused review of how development in the district impacts on health and wellbeing (i.e. through impact on AQMAs, noise impacts from Gatwick Airport).

The Horsham Society have questioned what the specific requirements of the policy are, and how they will be upheld.

Parish Councils

Billingshurst Parish Council felt the reference to development promoting good health and wellbeing should be strengthened.

Statutory Consultees

Sport England suggested that Active Design Principles should be referenced within the policy.

Policy 46

| Support – Policy 46 Community Facilities, Leisure and Recreation | |
|---|----|
| Number of Comments | 14 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>A number of individuals and community groups either supported or showed some support for Policy 46. They indicated support for the following reasons:</p> <ul style="list-style-type: none"> - Support / agree generally with all the policies in Chapter 10 - Agree, particularly facilities for young people - Green space should have the highest protection and should have presumption against development because it benefits physical and mental health. - Green spaces should be prioritised and should positively further the Districts portfolio of greens space. - Criterion 1.d. is important as must have safe access to facilities. Should introduce 'quiet lanes' or give pedestrians / cyclists priority over vehicles <p>West Sussex Local Access Forum welcomed the recognition given to the 'overall rights of way network contribute to the health and well-being of communities'. They also believed the policy wording should include a reference to 'informal' leisure and recreation, and the PRow network.</p> <p><u>Parish Council</u></p> <p>Rudgwick Parish Council expressed support.</p> <p><u>Site Promoter</u></p> <p>A comment received from a site promoter indicated support for the policy and that their proposal would accord with the requirements.</p> | |

| Observations – Policy 46 Community Facilities, Leisure and Recreation | |
|---|----|
| Number of Comments | 19 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>A number of general comments regarding community facilities were made. Some mentioned specific places and issues, such as the potential decommissioning of Drill Hall in Horsham town, while others referred to a more general need for community facilities to be provided. Comments were made that replacement facilities should be provided near to original locations rather than elsewhere. A number of comments highlighted the importance of particular activities (youth clubs, walking, riding, etc.) and that they needed to have facilities to support them.</p> <p>A number of comments raised the impact of general growth or specific development proposals and that residential development needed to bring forward facilities to accommodate a population increase. A number of comments identified the importance of developers keeping their promises.</p> <p>Some comments were received that highlighted the importance of green spaces, however small, and that they need to be introduced and protected from development.</p> | |

Horsham District Scouts advise that support for Scouting would be strengthened if the spaces and indoor facilities were better defined and set out facilities that they needed.

Object – Policy 46 Community Facilities, Leisure and Recreation

Number of Comments

23

Summary of Comments

Members of the Public and community groups

A number of comments were raised. Some expressed that a lack of/loss of community provision meant that specific sites should not come forward. A number of comments related to development causing the loss of Rookwood and/or Ifield Golf Club and these are detailed in summaries on respective sites.

Other comments included:

- A robust metric for golf should be included in the standards table. Bowls is included yet has fewer participants than golf.
- The Policy is inconsistent with para 97 of the NPPF. The policy should be re-written to give greater protection to sports & recreation facilities. Potentially the current wording facilitates the selling of sports facilities by the council such as the Stadium at Broadbridge Heath, it also encourages providers to run them down to an unviable position to secure redevelopment.
- A large centrally located parkland area should be created as a general district amenity and to increase the ratio of parkland per resident. Each new housing development reduces the ratio of publicly accessible parkland available per resident and this should be reversed.
- The Council should actively promote partnerships with community groups such as churches and sports groups who can own, lease and/or develop facilities for the broad use by new communities. This directly links to the objective for Horsham to be a great place to live and one where there is a strong, safe and healthy community.
- Add indoor tennis courts to the list of minimum requirements for community spaces. HDC did not follow Sport England's recommendations when planning The Bridge new leisure centre at Broadbridge Heath and this omission should be dealt with in this Local Plan.
- The standards should address requirements for faith groups and should refer to Places of Worship or, at least refer to Local Halls.
- Criterion 1a in the policy currently conflicts with Policy 9 and should be amended to allow community uses outside of settlement boundaries, on existing brownfield sites or through conversions of rural buildings, which would be in line with Policy 9.

CPRE Sussex stated that the policy should be amended to include “The health, well-being and social benefits of nature within built areas and near surroundings” to the requirements that Development should address. Quoting from research in the ‘The Health and Social Benefits of Nature and Biodiversity Protection’. [The Institute of European Environmental Policy (IEEP) (2016)], they particularly highlight the following text “*Benefits can be gained when making active use of nature, but also from the physical presence of nature in the near surroundings (direct health benefits). In the latter case, the distance from and amount of green space plays an important role in how large the health benefits are.*”

Christ’s Hospital Foundation stated that the policy was too restrictive and suggested it be clarified that criterion 3.a. and 3.b. only apply to ‘publicly accessible’ community facilities. Christ’s Hospital’s facilities are private and for use of pupils only, it has no impact upon the wider

population whether private facilities and services within the school are retained. There should be an additional policy to establish the principle of educational development within school sites and would allow Christ's Hospital and other schools within the District to plan to improve and upgrade their existing educational facilities with more certainty than the current policy context allows. This would enable the District's educational offer to be enhanced and would be consistent with para 94 of the NPPF.

Horsham Gymnastics Center advised there is insufficient sport and leisure provisions included within the proposed plans and that further work needs to be invested in the development of a credible sport and leisure infrastructure to be able to support the planned expansion of Horsham and surrounding district. Sports facilities should be planned and in place before housing development. They say the demand for indoor sporting activities exceeds the current provision and that the new Bridge Leisure facility is only just meeting current needs and will not meet the needs of future development. Given the planned expansion of Horsham they say HDC should consider and develop a credible and strategic plan to develop a sports park or sport village, similar to Guildford. This could cater for the needs of a variety of clubs, enhance wellbeing and generate new local jobs.

Horsham Society request the policy be amended as follows:

- 46.1.c Omit "seek not to cause significant harm" replace with "must not cause harm to species and habitats"
- 46.1 Change "The provision of new or improved community facilities or services..." to replace with "The provision of new or improved or existing community facilities, community centres or services..."
- What is the obligation on providing allotments to meet this criterion?
- 46.3 omit phrase "it has been demonstrated that one of the following applies" Both conditions must apply.
- 46.3.a Replace "or" at end of 46.3.a with "and" This must not be an "or" situation, but both criteria must be met. To ensure that an alternative is available and that the old premises is not viable. Otherwise this gives an easy way to remove the facility.

The British Horse Society stated that the policy itself should include a reference to the protection and improvement of the multi-use public rights of way network.

Woodland Trust suggest the standards should be amended to include access to natural environment and woodland for informal recreation. They recommend that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.

Parish/Neighbourhood Councils

A number of Parish Councils commented on the general need for community facilities, with some describing the many activities undertaken in their respective communities and that facilities are under pressure and that this will be exacerbated by further development. Funding issues were noted, particularly in respect of activities provided by charities or voluntary organisations.

Specific comments on the policy were few, but included:

- Criterion 3(a) should be amended to state that the old facility cannot be closed until the new facilities or services of equivalent or better quality are available and open for use.
- There is no specific reference to junior/intermediate sporting facilities.

- While acknowledging 10.29 states that the list is not exhaustive, playgrounds should be added.
- There are no examples or specific pieces of infrastructure identified.
- Parking for such facilities should be provided on site.

Statutory Consultees

NHS Property Service Ltd (NHSPS) note the policy seeks to safeguard community facilities and requests flexibility in its estate due to financial pressures. The disposal of unneeded or unsuitable sites and properties for best value is an important component in financing new or improved services and facilities. Surplus and vacant NHS sites must not be strategically constrained by planning policy particularly for providing alternative uses, such as, housing. Request the following wording be included in the policy:

“or, 3.c. the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.”

Sport England while we would generally support this policy it is not considered that criterion 3.b. reflects paragraph 97 of the NPPF and therefore is not appropriate for any proposal for the loss of existing open space, including playing fields and land and buildings in sport and recreational use. Request that criterion 3.b. be amended or additional criteria included as follows:

c) in the case of existing open space, sports and recreational buildings and land, including playing fields;

i) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

ii) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

iii) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

In addition to this planning policies and decisions should protect and enhance public rights of way. The Council's Built Sports Facilities Strategy identifies a current / future undersupply of swimming pools, which should be identified within this policy and the table.

Glossary

| Glossary | |
|--|----|
| Number of Comments | 10 |
| <p>Summary of Comments</p> <p><u>Members of the Public and community groups</u></p> <p>Comments included:</p> <ul style="list-style-type: none"> - The term greenfield should be changed to include woodland. - Biodiversity net gain needs to be included in glossary with explanation of how it is calculated. Environmental net gain needs to also be defined. - Ecosystem services, nature recovery programme and high quality rural character should be defined. - Bridleways should be added to green infrastructure <p><u>Parish Council</u></p> <p>Denne Neighbourhood Council sought the following additional terms to be added to the glossary:</p> <ul style="list-style-type: none"> - Employment categories - ICT infrastructure - D1 and D2 - 'A' uses - SEND <p><u>Statutory Consultees</u></p> <p>WSCC state that an explanation of the term 'Archaeological Assessment' needs to be updated to reflect Horsham District Council's current Development Management archaeological advice arrangements. It reads that assessment reports will be examined "by the West Sussex County Council Archaeologist". This should be amended to read "the District's archaeological adviser".</p> <p>Historic England state that definitions for 'Historic Environment', 'Heritage Assets' and specific asset types would be useful. Conservation Order should be amended to Conservation Area.</p> | |