



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 9: Sites Allocated for Development in the
Plan

Issue 1

November 2024

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Issue 1: Whether the strategic sites allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?

1. Horsham District Council considers Strategic Policies HA1 to HA4 to be sound. In summary:
 - Positively Prepared: The suite of policies form part of a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, and is consistent with achieving sustainable development. The policies allocate strategic sites that will assist with achieving housing requirements as identified by Strategic Policy 37 of the **Plan (SD01)**.
 - Justified: The policies help in the delivery of an appropriate strategy. All strategic allocations are supported by the findings of the **Site Assessment Report (H11)**, **Sustainability Appraisal (SD03)**, **Housing Delivery Study (H02)** and **Housing Delivery Study Update (H03)**. Topic Paper 1: The Spatial Strategy (HDC02) provides an overview of the development strategy of the Plan (SD01). The level of development identified for the settlements of Southwater and Billingshurst is considered appropriate as informed by the settlement hierarchy in Strategic Policy 2 and **Settlement Sustainability Review (EN07)** and also the **Habitats Regulations Assessment (SD07)**.
 - Effective: The policy is deliverable over the plan period as evidenced by the **Housing Delivery Study (H02)** and **Housing Delivery Study Update (H03)**.
 - Consistent with National Policy: The policies allocate housing along with employment and the necessary community facilities and services as part of sustainable urban or village extensions to Crawley, Southwater and Billingshurst and will enable the delivery of sustainable development in accordance with the **NPPF**, such as **paragraphs 68 and 73** as well as **paragraphs 8, 11, 15, 16 and 20**.

Question 1: Is Strategic Policy HA1: Strategic Site Development Principles sound? The justification refers to “Strategic Scale allocations” and “smaller housing allocations” and the policy refers to land allocated for “strategic scale development”. Is it clear which sites this policy applies to?

2. The policy is considered to be sound. The purpose of the policy is to sets out key principles applicable across all strategic sites, thereby setting a clear and positive framework for decision-making. The policy is therefore considered to be **positively prepared**. The policy responds positively to **NPPF** expectations, in particular as set out in **paragraphs 126 to 130** with regards achieving well-designed places. It is therefore considered to be consistent with national policy. The policy reflects the objectives of the plan, taking account of the evidence base (as set out in responses to other Matters Issues and Questions. This policy will also help secure high quality place making over the course of the plan period, and is therefore considered to be **justified** and **effective**.
3. The Council believes it is clear which sites the policy applies to. The reference to “smaller site allocations” is made in paragraph 10.79 of the Plan. Paragraphs 10.79 and 10.80 form the introduction for the whole section which is titled “Housing Allocations” and applies to all of Policies HA1 to HA21, i.e. applies to both strategic and smaller sites. On the other hand, paragraphs 10.81 and 10.82 are under the title “Strategic Policy HA1: Strategic Site Development Principles” and therefore refer solely to strategic sites.

Question 2: Paragraph 10.125 of the Plan says the total number of homes for each site allocated is expected to be within 10% of the figure quoted, is this justified and effective? The policies also refer to a number of homes to be delivered within the plan period in different ways e.g. ‘at least’, ‘approximately’? Is this effective?

4. The supporting text referred to seeks to provide clarity of interpretation of the policy. It allows some flexibility given the site yields quoted are estimates based on site assessments that have been undertaken ahead of any planning application being submitted, and in many cases ahead of any scheme design having been submitted by site promoters. In the Council’s experience, detailed scheme designs undertaken for a planning application, and with the benefit of detailed site assessments, can produce a site yield that diverges by some modest amount from the estimated capacity quoted in an allocation policy.
5. The Council acknowledges there is an internal conflict in the Plan comparing paragraph 10.125 (which allows a 10% divergence either side of the quoted number) and the wording of the settlement site allocations using ‘at least’. A modification (**SM55 in Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**) is therefore proposed to be made to **Policies HA5 to HA21 inclusive**, so that references to “...at least xx homes” are changed respectively to “approximately xx homes”. This will ensure internal consistency and reasonable flexibility, whilst achieving an effective policy as the degree of divergence permissible is modest.

Question 3: Are the allocation policies all consistent with the wording in the NPPF and legislation with regard to heritage assets? e.g. preserve or enhance the character or appearance of a Conservation Area?

6. The use of ‘preserve and enhance’ as a policy test is consistent with the wording in the NPPF. For example, **NPPF paragraph 20(d)** refers to the “*conservation and enhancement of the natural, built and historic environment*” (HDC emphasis). In the **NPPF Glossary**, the definition of ‘Conservation (for heritage policy)’ is “*The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance*” (HDC emphasis added). **NPPF paragraph 206**, which is concerned with new development in conservation areas and within the settings of heritage assets, states: “*Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.*” (HDC emphasis)
7. Turning to **Planning Practice Guidance**, a definition of a conservation area is set out in **Ref ID: 18a-023-20190723** which is: “*an area which has been designated because of its special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.*”
8. It is noted that the **Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)** sets out in **Section 72 (General duty as respects conservation areas in exercise of planning functions) part (2)**: “*In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*” Therefore legislation refers to ‘preserve’ rather than ‘conserve’ (to which the allocations policies align), but also uses the word ‘or’ rather than ‘and’. In the latter respect, there is an apparent inconsistency between legislation and the NPPF which, in advising that development should ‘sustain and, where appropriate, enhance’ heritage assets, effectively sets a higher bar than certain interpretations of legislation.
9. On balance the Council’s view is that the NPPF provides the primary guidance on such matters. The term ‘preserve and enhance’ is considered to align with the wording of the NPPF when taken as a whole.

Question 4: Are Figures 7-9 consistent with the submission Policies Map, particularly the site allocation boundaries? What is the purpose of including Figures 7-9 in the Plan, are they effective? Do they reflect the proposed level of development within the Plan period? Should they be referred to as illustrative masterplans unless approved as part of a planning application?

10. Figures 7, 8 and 9 are considered to be consistent with the submission Policies Map, subject to a correcting a minor drafting error on the western boundary (see **SM59** in **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**). Nevertheless, if any factual errors or inconsistencies are identified and evidenced in the course of the examination, the Council is happy to work with the Inspector and relevant participants to rectify these.
11. Masterplans perform a different function to the Policies Map. Masterplans present a vision and some guiding spatial parameters (i.e. provide a spatial representation of strategic policies). The Policies Map indicates specific and largely prescriptive land use designations. This follows the guidance in the **NPPF, paragraph 23** of which states:

“Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.”
12. Inclusion of Figures 7, 8 and 9 is effective. The purpose of the illustrative masterplans is to provide the spatial dimension to Strategic Policy HA2, and in doing so to provide a degree of certainty to both applicants and the public as to how the vision for these sites will become a reality. The masterplans respectively show the interrelationships that must be achieved between movement networks (especially for active travel) and the land uses and wider networks they connect to. They give assurance as to the extent and location of community infrastructure such as outdoor and indoor sports facilities, open space for informal recreation and biodiversity enhancement, new neighbourhood centres/community hub, and schools. They also give clarity as to which areas will be developed as built uses, and areas to remain undeveloped. Figure 8 (North West of Southwater) also shows where planning permission has been granted for earlier phases of the village extension, which is important context for understanding how future development will work.
13. The masterplans reflect the total development at the point of completion. In the case of West of Ifield (Figure 7) and North West of Southwater (Figure 8) this extends beyond the end of the Plan period. This approach purposefully looks ahead beyond 2040 to reflect **NPPF paragraph 22** which states:

“...Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”
14. The Council agrees that the masterplans included in the Plan should be seen as illustrative, as it is not the intention to pre-empt the planning application stage and comprehensive masterplan provided at that stage. Whilst proposals on the strategic sites will be expected to broadly comply with the illustrative masterplans, it is accepted that these sites will have long build-out periods to come forward in phases, and some circumstances may change. Therefore detailed considerations and evidence at planning application stages may necessitate some flexibility being applied. The Council has therefore suggested modifications (**SM51**, **SM53** and **SM54** in **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**) to insert the word ‘illustrative’ in front of references to the masterplans at relevant places in the Plan (as in the example given in the Council’s response to Question 5 below), to ensure that this point is clarified.

Question 5: Should Policies HA2-HA4 explicitly state whether or not a masterplan will be required as part of any planning application and whether such masterplans should include details of the phasing of development based on the development constraints and infrastructure provision?

15. Strategic Policies HA2, HA3 and HA4 all make reference to development being in accordance with a comprehensive masterplan which clearly shows the key elements of development. Therefore explicit

reference is made. The policies also refer to submission of a clear phasing plan being submitted alongside this. However, the Council considers the policy could be strengthened to make sure that infrastructure comes forward in a timely way, and that development is sustainable at all phases. This can be dealt with through the modifications process with wording added to existing policies setting out the appropriate requirements.

16. The Council recognises there may be a degree of ambiguity insofar as the policies refer to a comprehensive masterplan, whereas the supporting text in each case refers to the illustrative masterplans in Figure 7 of the Plan but describes them as ‘comprehensive’ (paragraphs 10.94, 10.108, paragraph after 10.119). To clarify, and reflecting the Council’s response to question 4 above, what will be expected from the applicant at application stage is a comprehensive masterplan which is based closely on the illustrative masterplans in Figures 7, 8 and 9 (albeit with scope for some variance to reflect the detailed evidence provided at the application stage).
17. Therefore, modifications (**SM51**, **SM53** and **SM54** in **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**) are suggested at relevant junctures in the supporting text for each of HA2, HA3 and HA4 to make this clearer, to state “An comprehensive illustrative masterplan has been developed...”.

Question 6: Are the employment requirements detailed in Strategic Policies HA2-HA4 consistent with other policies in the Plan? Should the requirements be specified in terms of both employment land and employment floorspace? Are the employment requirements specified within each allocation expected to be delivered within the Plan period?

Consistency with other policies

18. The employment requirements detailed in these policies are consistent with other policies in the Plan. Strategic Policy 29 (Table 6) identifies that 6.5 hectares of employment land is allocated in the strategic site allocations. Within Strategic Policies HA2-HA4 respectively, the following are specified:
- HA2 part 2(d) (West of Ifield): “Around 2.0 hectares of employment floorspace...”
 - HA3 part 2(c) (North West of Southwater): “Subject to suitable access being demonstrated, around 4 hectares of employment floorspace shall be provided...”
 - HA4 part 2(c) (East of Billingshurst): “Around 0.5 ha employment floorspace shall be provided...”
19. In each of HA2 to HA4 respectively, the relevant parts list the uses: non-retail and restaurant E class employment (offices, research, professional services and light industrial), B2/B8 uses (general industry and warehouse/distribution) and flexible desk space. This is consistent with Strategic Policy 29 which, in the policy box pre-amble, refers to meeting the needs of existing and future businesses requiring office, industrial, storage and distribution floorspace which fall within B2, B8 and E(g) Use Classes, together with other employment generating uses as appropriate. This policy in part 8 also refers to supporting proposals for business, manufacturing, storage and distribution uses (B2, B8 and part E(g) use classes). Hence there is consistency of what is sought across these policies.

Employment land (hectarage) and employment floorspace (square meterage)

20. Strategic Policies HA2 to HA4 specify employment land budgets within the wider site (as detailed above in paragraph 18). Whilst assumptions may be made as to what this translates to in square meters of built floorspace, the Council does not consider it would be appropriate to do so for the strategic sites.
21. This is because the allocations seek to achieve sustainable new neighbourhoods, with different uses coming forward over an extended time period, and engagement with new and growing communities will need to input into how the employment comes forward. Also, as explained in the **Council’s Hearing Statement for Matter 7, Issue 1**, the market for different types of employment space is difficult to predict even in the medium term. Therefore each strategic site will need to reflect a vision for employment and skills, and have a flexible plan for developing employment over time to reflect a

changing workforce and work culture. As such, overly prescriptive requirements expressed in terms of floorspace would not be appropriate for inclusion.

Will employment requirements be delivered in the plan period?

22. Yes, this is the expectation. The Employment Trajectory shown in Appendix 2 of the **Council's Hearing Statement for Matter 7, Issue 1** shows Land East of Billingshurst employment as developable within years 1 to 10 of the Plan period from adoption (2025 to 2035), whilst Land West of Southwater and Land North West of Billingshurst are shown as deliverable from 2036 to 2040.

Question 7: Where do the neighbourhood centres sit in terms of the retail hierarchy set out in Strategic Policy 35 of the Plan? Will proposals for new neighbourhood centres need to be supported by retail impact assessment? If so, should this be specified in the relevant policies?

23. The approach to new neighbourhood centres or community hubs are different for the three strategic sites. It is therefore necessary to address each one individually. However a response common to all three is that it would be premature to precisely define where these centres sit in a retail hierarchy until they have been built and occupied. The Council's view is that it would be very premature to determine this before a full or reserved matters planning application has been determined positively.

HA2: West of Ifield

24. HA2 part 2(b) provides for *"a new Neighbourhood Centre to provide a community, employment and transport hub to include a library, community centre, and potentially café and/or public house and indoor sports facilities*. The guiding principle has been to create an offer which is broadly equivalent to Crawley's well-defined neighbourhood centres, which form a key principle used to design the new town of Crawley. However its nearest equivalence in the context of Horsham's Plan (Table 8 of Strategic Policy 35 – Town Centre Hierarchy) is likely to be between a secondary centre and a local centre.
25. Given the close relationship of the development and proposed new neighbourhood centre with Crawley, it is considered appropriate to include in the policy a requirement for a retail impact assessment to form part of a planning application. This has been proposed in the **HDC Schedule of Suggested Modifications to the Regulation 19 Local Plan (SD14) (HM064)** which formed part of the Plan submission package, such that the following words are added to HA2 part 2(b): *"...subject to a retail impact assessment with account taken of existing Crawley retail centres."*

HA3: North West of Southwater

26. HA3 part 2(b) sets out the requirements for the new neighbourhood centre. (The Council has proposed a modification (**HM074 of SD14: Schedule of Suggested Modifications to the Regulation 19 Local Plan**). Paragraph 10.107 of the supporting text notes community concerns around potential conflict with the existing village centre, Lintot Square, and states that *"any new retail or community facilities that are delivered will therefore be required to demonstrate that Lintot Square will be retained as the primary centre for Southwater, in accordance with community aspirations."*
27. The Council's view is that the wording of paragraph 10.107 is sufficient to ensure due evidence is submitted with a planning application to demonstrate no harm is done to the existing village centre. Other retail offers that are relatively close to the site are not considered to be at risk. For example, Horsham town centre is the main commercial centre for the whole district, therefore additional community scale neighbourhood centres are unlikely to pose any real element of competition.

HA4: East of Billingshurst

28. HA4 part 2(b) sets out requirements for a new community hub. Paragraph 10.118 of the supporting text clarifies that new community facilities should identify *"opportunities for enhanced community benefit in order to provide 'fit for purpose' facilities for both the new and existing community to help secure community integration and inclusion."* This signals that the community hub should be of an appropriate scale and nature to complement the nearby existing village centre serving Billingshurst (which is classed

as a secondary centre). It follows that it would likely fall into the lower rung of the settlement hierarchy in Strategic Policy 35 (a 'local centre') or even outside of any formal categorisation due to the modest size envisaged.

29. As the policy requirement is for a community hub which focuses on community facilities, and only 'a shop' (i.e. singular) to encourage community cohesion, a formal retail impact assessment is unlikely to be necessary.

Question 8: Do Strategic Policies HA2-HA4 have sufficient monitoring and review mechanisms?

30. Yes. The approach taken for monitoring the policies of the Horsham District Local Plan is to publish an annual Authority Monitoring Report (AMR). This records the progress made on building out already-allocated strategic sites among other policy indicators. In addition, a Monitoring Framework has been prepared that sets out further detail as to how the policies in the Plan will be monitored. This covers all policies in the Plan (see Appendix 1 of the hearing statement prepared in response to Matter 10).

31. It is proposed to continue using the AMR as the means of monitoring and review. The progress made on permissions granted and building out housing on the three strategic sites as part of the overall housing supply will allow the Council to review periodically whether there are blockages on development coming forward. Further details are set out in the response to Matter 10.

Question 9: Is Strategic Policy HA2: Land West of Ifield sound?

[a\) What is the justification for the proposed number of dwellings and employment in total and over the plan period?](#)

[Justification for proposed number of dwellings](#)

32. HA2 allocates Land West of Ifield as a comprehensive new neighbourhood which will deliver approximately 3,000 homes. The policy also states that it is anticipated at least 1,600 of these will be delivered in the period to 2040.

33. The overall site capacity has been informed by the site assessment (see **Site Assessment Report (H11) Part B, page 90 onwards**), having regard to a number of site constraints and land budget requirements for supporting infrastructure and also significant land take for a new secondary school. It has also considered discussions with the promoter, Homes England, whose representation on HA2 (**response ref: #1193327**¹) supports the figure of approximately 3,000 homes in total (see **paragraph 3.1 of Homes England's representation**).

34. However in applying due diligence, the Council has recognised that a strategic site of this nature is unlikely to have planning permissions in place, or a fast enough pace of delivery, to deliver the full 3,000 homes within the Plan period. The **Housing Delivery Study (H02)** and **Housing Delivery Study Update (H03)** address build-out rates in light of past build-out rates, direct engagement with the site promoters, and the Council's evidence on viability and infrastructure delivery. Their findings are reported in the Housing Delivery Study Update paragraphs 4.20 to 4.43 and concluded that 2,560 homes could be completed by the end of the Plan period. However the Council's view is that the assumption in this study of annual build-out rates of 300 homes across a number of years is unrealistic. Long term monitoring of housing completions on strategic sites in the district has evidenced that such a level of completions has rarely been consistently achieved on a strategic site within the district. The nearest strategic allocation in this location averages approximately 120 homes per year. The Council further notes that **paragraph 4.32** of this report assumes sufficient access to the local authority-led water use offsetting scheme (SNOWS) to support later phases of development, and acknowledges that "*the*

¹https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/showUserAnswers?qid=9331459&voteID=1193327

calculations behind this strategy, and its practical deliverability, is yet to be tested and has been questioned by the Council.”

35. Given the above, the Council has concluded that delivery will in reality not meet the level suggested in the Housing Delivery Study Update. Whilst recent updates to the housing trajectory predict that a higher number than 1,600 will be achieved by 2040, it is considered on balance that a policy target of **at least 1,600** is appropriate and provides due flexibility. The Council’s overall approach to calculating future housing supply (the ‘housing trajectory’) is explained in **Topic Paper 2: Housing Supply (HDC03)**, with the detailed figures shown on page 3 of **Appendix 1** to HDC03.
36. The Council notes that **Homes England’s representation states in paragraph 3.5**: *“Whilst there is a realistic prospect that the site allocation can be delivered in full over the Local Plan period, the identified delivery of a minimum of 1,600 homes at the site will be effective and sound.”* This would seem to support the Council’s approach, given that the 1,600 figure is definitively a floor, allowing opportunity for more to be delivered should favourable circumstances prevail.

Proposed employment

37. HA2 part 2(d) expects the site masterplan to allocate land for around 2 hectares of employment floorspace, to incorporate an enterprise and innovation centre, to include offices, research, professional services, light industrial, general industrial and warehouse/distribution uses. The policy also expects provision for improved home working facilities and desk-space units within the development (note that a suggested modification SM52 is proposed for this part of HA2 – see paragraph 78 below). The **Site Assessment Report (H11)** records that the 2 hectares land budget was put forward by the site promoters, and also clarifies that this would equate to some 22,000 square metres of employment floorspace.
38. The illustrative masterplan shown in Figure 7 of the Plan indicates as blue hatched the parcel of land thought suitable for employment uses. This parcel would be to the north of the proposed multi-modal corridor forming the main movement artery into the site, and therefore provide some separation from most residential areas and provide good access for goods vehicles. Further non-retail/hospitality employment would be provided by the proposed innovation centre which is proposed to be positioned close to the neighbourhood centre.
39. The amount of employment stipulated in the policy has thus been led by the evolution of the masterplan, but also informed by the principle set out in the Strategic Policy HA1 which seeks one job to be provided per new home built. The land budget proposed for employment, taken with jobs arising from the schools, retail and community infrastructure and home workers, has been calculated to amount to approximately 2,900 new jobs.

b) Does this allocation accord with the Plan’s vision and objectives?

40. Yes. The Plan’s vision is set out at paragraph 3.13 in the Plan: *“A place where people from all backgrounds can choose to live and work, in a high-quality natural environment and low carbon economy with access to high-quality jobs, services and facilities and green spaces that are close to home.”* The site is located adjacent to Crawley which as a high-order settlement provides great opportunities for high-quality jobs, services and facilities. The site policy and illustrative masterplan also demonstrate how the development itself will provide multiple benefits that align closely with the vision. The ethos behind the proposals that have emerged is provision of a range of types and tenures of homes, and the design is based on the concept of a ‘15 minute neighbourhood’ whereby all day-to-day services and facilities are within a 15 minute walk or cycle ride for all residents.
41. Table 1 in the Plan sets out ten spatial objectives for Horsham District, which, broadly speaking, cover key sustainability considerations: thriving communities, sense of place, a low-carbon future, preserving character, achieving net biodiversity gain, timely provision of infrastructure, accessibility for all including to open spaces, meeting employment needs, and providing a range of housing types to meet the range of needs arising for people and families. The Council has carefully considered the site, and proposals put forward against a number of sustainability tests which, whilst based on the NPPF, also align well

with the Plan's objectives. The outcome is in the **Site Assessment Report (H11) from page 90 onwards.**

[c\) What is the latest position with regard to the Development Consent Order for the Gatwick Northern Runway Project and are main modifications needed to this policy, other policies of the Plan or the Plan's evidence base to reflect this?](#)

42. The Council notes that this question was also asked under **Matter 6, Issue 1 as Question 4(b)**. Part of the answer given in that statement was with regard to Plan Policy 26: Gatwick Airport Safeguarding, however the response on the latest position is common to both the Council's Matter 6 statement and this one and is therefore not repeated here.
43. **The Council's Matter 6 statement** also considered the question in relation to site allocation policies, and specifically to HA2: Land West of Ifield. For the benefit of participants in Matter 9, the same answer is repeated in the following two paragraphs:
44. The West of Ifield site allocation policy (HA2) has been drafted in knowledge that there is likely to be expansion at the airport, in some form, during the Plan period. The West of Ifield masterplan has taken account of noise contours, with no residential or other noise sensitive uses permitted where aircraft noise will exceed 60dB LAeq 16hr (or 57dB for Gypsy and Traveller accommodation). The policy also stipulates that any application must include assessment of aircraft noise.
45. The Council fed into GAL's preparatory work on the Cumulative Effects Assessment (CEA) which was submitted into the NRP DCO examination² (APP-045 in the NRP DCO Examination Library), and this ensured that the West of Ifield site was included in the CEA as a Tier 2 development, allowing the possible interaction of airport expansion and the development to have been considered as far as is feasible with the level of information available.

[d\) Is the allocation consistent with paragraph 99 of the NPPF, particularly with regard to the loss of Ifield Golf Course?](#)

46. The Council has had very careful regard to the requirements of **NPPF paragraph 99** from the time it became clear that Ifield Golf Course formed part of the wider site being promoted for development by Homes England. The Council has always been clear that a high evidential bar is necessary when the loss of a large leisure facility such as the Golf Course is at stake.
47. In summary, NPPF paragraph 99 states that open space and sports land should not be built on unless one (or more) of three tests is met: (a) there is evidence that it is surplus to requirements; or (b) the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or (c) the development is for alternative sports or recreational provision the benefits of which clearly outweigh the loss of the current use.
48. With that in mind, the Council has undertaken two key studies on a District-wide basis. The first of these was the **Golf Supply and Demand Assessment (I02)**. In summary this found that Horsham District currently has sufficient golfing provision. However, this does not necessarily constitute an oversupply of provision. Its key recommendation was that in a situation where golf facilities are to be lost, proposals will need to demonstrate that the provision is not required, or that appropriate provision will be retained and/or re-provided within a suitable catchment area; this should take into account affordability and justify why the existing user base will still be provided for.
49. The second study was commissioned to update on previous findings following changes to the Local Plan strategy and recognising the impact of the Covid-19 pandemic. This is the **Golf Supply and Demand Assessment Update (I03)**. The updated conclusions provided some more granular recommendations. In particular it noted that whilst supply is currently deemed to be sufficient to meet demand, it is also clear that each facility is meeting a need due to current membership and usage levels, and potential future demand provides further evidence that each existing facility is required. Therefore it is unlikely that any loss of provision could be supported without appropriate mitigation being secured due to capacity pressures that would be created. It then reiterated that if existing development proposals

and/or the potential loss of any golf provision are to be pursued, separate site-specific needs assessment studies are needed to fully determine requirements, with a full and specific focus on the site/s in question and concentration on a more closely defined and more relevant catchment area (a 20-minute drive time from the site/s). Furthermore, for a proposal to go ahead, any such needs assessment will need to evidence that the provision is surplus to requirements or set out a mitigation proposal that replaces the supply to an equivalent or better quantity and quality in a suitable location, as per the NPPF's requirements.

50. The **NPPF (paragraph 31)** provides steer on preparing and reviewing plans: with regards evidence, NPPF states that *“this should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”* The evidence contained in the Golf Demand and Supply studies (**I02** and **I03**) was considered an adequate and proportionate basis on which to progress the Plan to submission.
51. Nevertheless, it was important to have reasonable assurance that there was a strong prospect of NPPF paragraph 99 being met, and KKP's recommendations being fulfilled. The Council therefore requested Homes England to produce further evidence to support their emerging scheme. In the lead-up to the Regulation 19 Plan being prepared, Homes England informed the Council that a West of Ifield Golf Needs Assessment was in preparation. Homes England issued an interim position statement in November 2023 which confirmed advancement of this study, and gave a justified explanation as to why there was a reasonable prospect that the paragraph 99 tests would be satisfied subject to the final findings of the study.
52. The Council notes that the Golf Needs Assessment, prepared by Sports Planning Consultants, was published in draft by Homes England in July 2024, in advance of the Plan submission.² The high-level conclusions can be summarised as follows:
- The loss of Ifield Golf Course would have an impact on course availability but any displaced golfers could travel to other courses, with reasonable levels of provision remaining, and to be both accessible and available. It was found that five alternative courses have availability and are looking to increase membership and usage.
 - Within a 20-minute catchment of the golf course, there is and would remain a gap in the leisure, recreation and golfer market, which provides the stepping stones into more regular golf participation and transition to golf on standard courses. There would however remain a good, universal offer catering for more established golfers.
 - The loss of IGC would not therefore have a significant impact on the mix of facilities or limit opportunities for newer golfers looking to take their first steps into the game.
 - In terms of future growth in demand for golf facilities, the trends at both national level and at Ifield Golf Club itself would suggest that overall growth is unlikely to be significant. All clubs consulted reported either static or declining membership and usage. Any increases via population growth are therefore likely to be negated by downward trends and attrition.
53. Overall, the report authors found that there will be impacts of the potential closure of the course, but in planning terms concluded that there is a relatively balanced position in terms of current supply and demand, with capacity existing to absorb displacement. They did not deem the course clearly surplus to requirements, however concluded that the position is marginal and given the market characteristics, it does not require replacement on a like for like basis. The deficiency in the 20-minute core catchment is considered marginal so a full replacement 18 hole golf course is not proportionate, instead alternative golf enhancements to provide a more varied offer, whilst protecting the needs of established members, would more appropriately mitigate for the loss of this course.

² <https://westofifield.commonplace.is/en-GB/news/west-of-ifield-draft-golf-needs-assessment>

54. Having established that the golf course is not conclusively surplus to requirements, the Council has noted the suggested ways in which compensatory provision could be achieved, in relation to both test (b) and test (c) of NPPF paragraph 99. In particular the Council notes that Homes England has published on their website³ a 'Draft NPPF Para 103 Assessment' (Para 103 references the renumbered paragraph 99 in the version of the NPPF published December 2023).
55. With regard given to that evidence together with ongoing discussions with Homes England, the Council sees merit in the development of a Homes England-led Golf Mitigation Strategy, which could include the following potential mitigation options:
- Targeted investment in municipal courses within the IGC catchment. This would be secured through Section 106 Agreement.
 - Enable / accelerate qualitative investment in traditional golfing facilities. This would increase the quality and overall capacity for traditional gold formats, increasing the attractiveness of alternatives for displaced Ifield Golf Club members.
 - Enable / accelerate quantitative improvements in new / alternative golf facilities. This would target new entrants to golf and / or provide alternative facilities such as Adventure Golf, enhanced practice facilities, golf simulators or shorter game formats, in order to broaden the golf offer and encourage new entrants into the game.
56. The Council also gives regard to part (c) of NPPF paragraph 99, and highlights that the Land West of Ifield Illustrative Masterplan (Figure 7) includes significant new sport and recreational facilities. The Council notes in this context that in their 'Draft NPPF Para 103 Assessment', Homes England has published as Table 3 in that document a comparison of baseline (minimum) masterplan provision with what can additionally be provided over and above the baseline. Whilst these details are subject to consideration at the planning application stage, should they be confirmed and be shown to be clearly deliverable this would also be material in considering the weight ultimately given to paragraph 99.
57. In conclusion, the Council has concluded that, for the purposes of plan-making, paragraph 99 is satisfied. This reflects that the issue of whether the Golf Course is surplus to requirements is marginal, and that there is very good prospect of providing compensatory measures that have wider public benefit and outweigh the loss of Ifield Golf Club as a sports facility.

[e\) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?](#)

58. Yes. There is a clear evidence base to provide high-level assurance that the transport impacts of the development have been assessed and the mitigation (which in line with **DfT Circular 01/2022 – Strategic Road Network and the Delivery of Sustainable Development**⁴ is primarily based on sustainable travel interventions) is sufficient.
59. The **NPPF sets out in paragraph 110** the expectations when allocating sites in development plans, or for specific applications for development. The criteria focus on opportunities for sustainable transport modes, safe access for all users, street and parking design, and cost-effective mitigation of impacts on the transport network. **Paragraph 111** states: *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”* It is further noted that DfT Circular 01/2022 – Strategic Road Network and the Delivery of Sustainable Development heavily encourages sustainable travel interventions over 'predict and provide'.

³ <https://westofifield.commonplace.is/en-GB/news/west-of-ifield-draft-golf-needs-assessment>

⁴ <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development>

60. The Council's statement for **Matter 6 Issue 1 (in particular Question 2)** summarises the work undertaken by the Council to strategically assess the impacts of the Plan on transport, including consideration of the Crawley Western Multi-Modal Corridor. That statement confirms the significant involvement of both West Sussex County Council as the local transport authority, and National Highways. Both have signed Statements of Common Ground (**DC11** and **DC15** respectively) indicating support for the Council's approach and agreeing that the mitigation proposed is sufficient.
61. The Council highlights that the allocation policy is predicated on achieving a degree of self-containment, with many day-to-day journeys being made early. Nevertheless, the policy will ensure that high-quality bus, cycle and pedestrian links to key destinations outside the site are achieved in early stages of the development build-out. Part 8 of the policy requires submission of a comprehensive transport strategy focused on active travel, and the extension of Crawley's Fastway bus network which will provide frequent and fast connections into Crawley destinations. Such measures will be reinforced through a comprehensive travel plan and construction travel plan.
62. The **Horsham Transport Study (106)** used strategic modelling to compare traffic flows and junction delays in 2039 using a 'reference case' versus a 'with Local Plan' scenario. The reference case represents a do-nothing approach whereby only background traffic growth is modelled and there are no new site allocations. The '2039 Local Plan Scenario' looks at cumulative impacts across the study area (which goes slightly beyond the District boundaries). Chapter 5 of the Study examines the modelling results, and includes **Tables 5-1, 5-2, 5-4 and 5-5** showing what happens at the road junctions across the District where there are capacity issues or where the local plan has a significant impact on the capacity at the junction. **Paragraphs 5.2.22 onwards** identifies the junctions that see a greater than 1.5% 'worsening' of congestion (based on volume to capacity ratio) and then identifies where mitigation is required. It should be noted that the analysis considers the impact of all development over the Plan period, and does not individually analyse the impact from specific sites.
63. Table 1 below lists junctions in the wider vicinity of the site which see a more significant increase in delay. Commentary taken from the study to explain the recommended mitigation is given.

Table 1: Junctions in Horsham District close to West of Ifield site (see Horsham Transport Study (106) Figures 5.1 and 5.2 for locations)

| Junction (location ref) | Impact and proposed mitigation (from paragraphs 5.2.23 to 5.2.39) |
|--|--|
| Harwood Rd/Forest Rd/ Crawley Rd Junction (location 22) | There is scope to optimise the signals to mitigate the local plan impact. |
| A281 East Street / Park Way Junction, Horsham (location 27) | Signal optimisation would be sufficient to alleviate the slight impact caused at the junction from the local plan. |
| A264 West-bound approach at Moorhead Roundabout, Horsham (location 33) | Signal optimisation makes the junction operate within capacity with the local plan developments. |

64. **Tables 5-3 and 5-6** of the Horsham Transport Study show there are also a number of junctions in Crawley Borough that see a greater increase in congestion than would be the case without the Plan being implemented. **Paragraphs 6.5.1 to 6.5.4** of the study considers this further. Whilst no specific mitigation has been put forward, the report states that sustainable transport mitigation on the Ifield Avenue route may reduce the need for highway mitigation at the level of development at the West of Ifield Site included within the model. Furthermore, junctions within Crawley identified as requiring mitigation are likely to be impacted on with the proposed Crawley Western Multi-modal Corridor, with a

resultant reduction of traffic and congestion along the A2220 Horsham Road, the A23 Crawley Avenue and Ifield Avenue.

65. The Council considers that mitigation of West of Ifield impacts on the road network in Crawley are best considered at the planning application stage, jointly with Crawley Borough Council, West Sussex County Council and the applicant, given the impacts principally affect the local network. The Council and Crawley Borough Council are engaged in pre-application discussions with Homes England under the auspices of a Planning Performance Agreement. The Council confirms that measures to mitigate these local impacts are under active consideration as part of a package of measures focused on optimising necessary journeys being made through active travel or public transport which will make the most of the site's sustainable location next to Crawley.

f) Have the air quality impacts been adequately assessed and is the mitigation proposed sufficient?

66. Strategic Policy HA2 identifies that there may be impacts on the Hazelwick Air Quality Management Area in Crawley Borough. Specifically, Part 5 of the policy requires that an Air Quality Impact Assessment and comprehensive Air Quality Strategy is submitted to and agreed by the Council to demonstrate that any impacts on the Hazelwick Air Quality Management Area, and any impacts elsewhere, have been assessed and mitigated.
67. The Council is engaged in a Planning Performance Agreement with Homes England, as site promoter, and with Crawley Borough Council, which includes consideration of air quality impacts. The policy provides a safeguard that air quality will be properly considered, however given the strong focus on high levels of active and sustainable travel choices, there is good prospect that air any quality impacts can be fully mitigated. The details for this will be included in a future planning application.

g) Have water and flooding impacts been adequately assessed and is the mitigation proposed sufficient?

68. Yes. In terms of water supply, the Council can advise that the development will have access to water credits generated under the local authority-led SNOWS scheme, to aid in the achievement of water neutrality. It is understood that Homes England as the site promoter and landowner will be able to demonstrate other forms of offsetting associated with saving water currently used for irrigating the Ifield Golf Course.
69. In terms of flooding, the Council is conscious that the **Sequential and Exception Flood Risk Tests** report (**CC04b**) identifies Land West of Ifield as requiring further assessment as greater than 1% of the site area is within Flood Zones 1 or 2 and there is risk of future fluvial or tidal flooding. The report explains in paragraph 4.24 that whilst reasonable alternatives have been considered in the context of the sequential test, none have been assessed as being more suitable. The Council has had regard to **NPPF paragraph 163** which states: *"if it is not possible for development to be located in areas with lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied."*
70. An exceptions test has been undertaken to ensure compliance with nationally prescribed guidance, which is set out in Appendix 3 of the report **CC04b**). The exceptions test has shown it is appropriate to allocate the site given wider considerations. It is stated that the scale of the site means that the emerging masterplan can respond to sources of flood risk and not include development on any area of land classified as flood zone 2 or 3. However it is highlighted that development should be supported by hydraulic modelling of the Upper River Mole, and a Flood Risk Assessment undertaken for the site which should be informed by the **SFRA Update (CC04)**. The exceptions test for the site concludes that given that the emerging masterplan limits development to Flood Zone 1, and on the basis of good prospect of a comprehensive sustainable drainage strategy being implemented, it is concluded that the development can be considered for allocation.

[h\) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation sufficient?](#)

71. Yes. The issues of heritage, biodiversity and landscape have all been assessed as part of the **Site Assessments Report (SAR) (H11)**. The council stresses however that there is a distinction between a strategic-level assessment of landscape impact and mitigation, and the more detailed evidence to be required at planning application stage.
72. Firstly, the SAR summarises the outcome of the **Landscape Capacity Study (EN08)** and also notes that evidence has been submitted by the site promoter to inform an emerging masterplan. The assessment notes there is potential for mitigation of landscape impacts, and opportunity for landscape enhancement where the landscape is already compromised. The overall impact is assessed as 'unfavourable', but the Council notes that this is in the context of most greenfield sites across the district, of all scales, having been similarly assessed as 'unfavourable' or 'very negative'. The Council can confirm that in-depth pre-application discussions have been undertaken to ensure that robust evidence of landscape impact and mitigation is developed and agreed in advance of a formal planning application being submitted. In short, development of the masterplan has been fundamentally landscape-led.
73. Secondly, the SAR reports on biodiversity impact, mitigation and enhancement. The report notes that there are a number of sensitive biodiversity assets around and on the site. It is particularly noted that Ifield Brook Meadows Local Wildlife Site is habitat-rich, and that there is known to be a number of roosts hosting protected Bechstein bats close to proposed areas of development. The report further notes that the masterplan leaves around 50% of the site as undeveloped, and will provide suitable buffers and strong commuting features to support the Bechstein population. Due to these sensitivities, the overall impact is assessed as 'unfavourable'.
74. As with landscape, in-depth pre-application discussions have been undertaken which has considered professionally prepared evidence of both impacts, and the effectiveness of mitigation, with respect to habitat protection and diversity. Natural England has been directly engaged with on the matter of mitigating potential impacts on the Bechstein bat population, and the comprehensive masterplan in preparation accompanying a planning application will be required to reflect their advice. The **Natural England Statement of Common Ground (DC14)** paragraphs 4.4 to 4.7 reflect this.
75. In terms of policy protections, part 4 of the policy sets out the requirement for a comprehensive Ecology and Green Infrastructure Strategy, incorporating a Biodiversity Net Gain plan to demonstrate how a minimum 12% net biodiversity gain will be achieved. The criteria (a) to (g) provide a fine-grained framework to ensure that developers take all necessary actions to protect and enhance a number of natural environment assets.
76. Thirdly, the SAR considers impacts on cultural heritage. This recognises that the Ifield Conservation Area, which includes the Grade I Listed St Margaret's Church, is a significant constraint. There are further Grade II Listed buildings adjoining or close to the site, and the Ifield Court site is a Scheduled Ancient Monument. The masterplan has evolved to reflect these constraints, ensuring that appropriate buffers are incorporated and historic viewpoints to St Margarets Church and the Conservation Area are maintained. In terms of policy levers, part 3 of the policy makes clear that all designated and non-designated heritage assets and their settings are preserved and enhanced, and flags particular character features that development proposals must take account of.

[i\) Do homeworking facilities form part of the 2.0ha of employment floorspace?](#)

77. Part d of the policy refers to around 2.0 ha of employment floorspace, to include "*iii. provision for improved home working facilities and desk space units within the development*". This is intended to reinforce that homes will provide as standard space and utilities for home working, but also that flexible desk space units (sometimes referred to as 'co-working' spaces) will also form part of the employment mix within the 2.0 ha land budget. These are two different elements of the development, but complement one another closely as workers (supported by their employers) can potentially choose to work either at home or in a dedicated work space that is easily accessible to their home address.

78. It is recognised that the wording for this particular criterion may be ambiguous. It is therefore proposed to make a modification (**SM52 of Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**) to clarify this point, such that criterion 2(d)iii reads: “...*provision for ~~improved home working facilities and flexible desk space units within the development.~~*”

[j\) Have the impacts on Crawley been adequately assessed and mitigated?](#)

79. The Council particularly draws attention to the very positive impact that will come from the delivery of a new 8-form entry secondary school (expandable to 10-form entry) as part of the promoter’s proposals. This will address the very pressing need for a new secondary school to meet new and existing needs from Crawley Borough’s expanding population, in the context of there being no suitable site for the school within Crawley Borough. This need is identified in the **Infrastructure Delivery Plan (SP04)** (page 123) and identified as a cross-boundary development need in paragraph 9.1 of the **Crawley Statement of Common Ground (DC04)**.

80. With regards other impacts, the Council is aware of concerns regarding impacts on Crawley’s transport networks, schools, health care and sports/leisure facilities. With regards transport, reference should be made to paragraphs 64 and 65 of this statement. Also as stated in paragraph 61 the policy requirements, and emerging proposals, include significant expansion of Crawley’s Fastway bus network which will add capacity to the movement network.

81. Beyond transport, attention is drawn to the extensive provision of education and community infrastructure as part of the development. As well as the new secondary school, provision will be made for at least one new 2-3 form entry primary school, extensive outdoor and indoor sports facilities largely exceeding minimum standards, and a new health centre. The **West Sussex County Council Statement of Common Ground (DC11)** confirms that, subject to suggested modifications being agreed, appropriate provision is made in the District, including at this site, to meet infrastructure needs arising from local plan developments. Therefore no undue pressure is expected on Crawley’s infrastructure arising from the Plan. The Council also draws attention to suggested **modification (HM064)** requiring a retail impact assessment for the proposed neighbourhood centre, as discussed in paragraph 25 of this statement.

[k\) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?](#)

82. As mentioned in paragraph 81 above, the **West Sussex County Council Statement of Common Ground (DC11)** confirms that the Plan (as suggested to be modified) and **Infrastructure Delivery Plan (SP04)** provide sufficiently for education, transport, flood risk, libraries and fire and rescue services. For all types of infrastructure, the Infrastructure Delivery Plan is considered comprehensive. The evidence supporting the identification of infrastructure needs is set out in various documents contained within the examination library. In terms of effectiveness of delivery, the **Horsham Local Plan Viability Assessment (H12)** includes a chapter on each of the strategic sites which considers the costs of infrastructure to support the site’s development. **Paragraphs 8.119 to 8.122** indicate that the development proposed is deliverable.

Question 10: Is Strategic Policy HA3: Land North West of Southwater sound?

[a\) What is the justification for the proposed number of dwellings and employment in total and over the Plan period?](#)

83. HA3 allocates Land North West of Southwater for mixed-use strategic development and associated infrastructure for 1,000 homes, of which it is anticipated that 835 will be delivered in the Plan period. This figure comprises 450 homes allocated in the made Southwater Neighbourhood Plan, together with an additional 385 dwellings.

84. The **Site Assessment Report (H11) Part B, pages 64-69** has been used to inform the site capacity, having regard to a number of site constraints and land budget requirements for supporting infrastructure and also the significant land take for a new secondary school to be provided by the Department of Education. It has also considered discussions with the promoter, Berkeley Homes, whose

representation on HA3 (**response ref: #198968**⁵) supports the figure of approximately 1,000 homes in total.

85. However in applying due diligence, the Council has recognised that a strategic site of this nature is unlikely to have planning permissions in place, or a fast enough pace of delivery, to deliver the full 1,000 homes within the Plan period. The **Housing Delivery Study (H02)** and **Housing Delivery Study Update (H03)** address build-out rates in light of past build-out rates, direct engagement with the site promoters, and the Council's evidence on viability and infrastructure delivery. Their findings are reported in the **Housing Delivery Study Update (H03) paragraphs 4.44 to 4.57** and concluded that 840 homes could be completed by the end of the Plan period.
86. The Council's overall approach to calculating future housing supply (the 'housing trajectory') is explained in **Topic Paper 2: Housing Supply (HDC03)**, with the detailed figures shown on page 3 of **Appendix 1** to HDC03. The Council has noted changes proposed by the site promoter, Berkeley Homes to Land West of Southwater (the permitted Broadacres development in Southwater) which reduce the number of dwellings on Phase 4 from 214 to 199 and increase the numbers on phase 5 from 80 to 95 (planning application DC/24/1138/REMCON). This means that there is a good chance that completions on Land North West of Southwater will not start until 2030/31. This could, however, also lead to slightly higher build out rates between 2030 and 2040, with completions expected to start on Land North West of Southwater in 2030, given the pent-up demand for housing. In addition, it is expected that the site at Highwood, Horsham (which is also developed by Berkeley Homes) will finish completions by 2030/31 and Berkeley Homes could transfer the staff from this site once it is finished to Land North West of Southwater. As set out in Topic Paper 2, it is therefore expected that a higher number than 735 will be achieved by 2040. However it is not considered necessary to update the policy, as, consistent with Strategic Policy HA2: West of Ifield, the figure in the policy is considered a 'floor' and provides due flexibility should delivery not come forward as quickly as expected.
87. In terms of employment, Policy HA3 part 2(c) in the Plan states that subject to suitable access being provided, it is expected that around 4.0 hectares of employment floorspace shall be provided (office, including flexible desk space, industrial, storage, and / or distribution) within one or both of the employment area identified to the north of the development site, and the neighbourhood centre. The **Site Assessment Report (H11)** records that the site promoter is seeking to provide an employment hub in the north of the site for approximately 3 hectares of employment space.

[b\) Is this allocation consistent with the Southwater Neighbourhood Plan \(2021\) allocation for around 450 homes or more?](#)

88. Yes, it is considered that the allocation of 1,000 dwellings at Land North West of Southwater is consistent with the Southwater Neighbourhood Plan allocation of 450 dwellings. The Southwater Neighbourhood Plan runs between 2019 and 2031 and allocates approximately 450 dwellings for Southwater. The Plan period runs to 2040 and needs to provide homes up to 2039/40. The allocation of 1,000 homes includes the 450 from the Neighbourhood Plan plus an additional 550 dwellings. This is not considered unreasonable for a 9 year period in Southwater, which is one of the largest and most sustainable settlements in the District.

[c\) Is the secondary school critical to the delivery of the development allocated? What progress has been made to date? Are there any barriers to delivery?](#)

89. The Council considers that the secondary school is critical to the delivery of the development. The Plan's vision is contained on page 16 and it is "a place where people from all backgrounds can choose to live and work, in a high-quality natural environment and low carbon economy with access to high-quality jobs, services and facilities and green spaces that are close to home". It is therefore vital that services and facilities are provided, so that the vision for the District can be fulfilled and this includes the provision of school places. There is considerable pressure on school places in the District, which is due

⁵https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/showUserAnswers?qid=9331459&voteID=1198968

in part to substantial recent housing completions between 2013/14 - 2021/22, averaging 950 dwellings per year. This has led to residents in Southwater in recent years being potentially displaced by way of being offered only school places in neighbouring Mid Sussex schools, due to the lack of school places in Horsham District. To accept the 'status quo' would be to work against the Plan's Objective 5 (concerned with necessary and timely infrastructure, providing accessible community services and prioritising access to services by walking, cycling and public transport).

90. The Council is aware that the site promoter has been engaged in positive dialogue with West Sussex County Council about the delivery of the school for several years and continues to speak to them about the school specifications and possible delivery timescales. It is currently envisaged that the school will be delivered in the first phase of development.
91. There are several potential barriers to the delivery of the schools on this site. At a strategic level, child yield figures in the District are regularly changing and West Sussex County Council must plan to the best of their abilities to ensure that adequate provision is made for the District's school children in terms of school places. At a site level, agreement must be reached between the Council, West Sussex County Council and the developer on exactly where on site the schools will be located. Development will be in accordance with a comprehensive masterplan to be agreed with the council. In addition, appropriate developer contributions/ land provision will need to be agreed through a legal agreement between Berkeley, West Sussex County Council and the Council to ensure the successful delivery of the schools.
92. Nevertheless, these issues are not unique to this site nor indeed the District. The Council is confident that there is a strong collaborative relationship between the developer, the local education authority and the Council focused on the timely delivery of the school, such that any risk of delay or non-delivery is minimised.

[d\) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?](#)

93. Yes, there is a clear evidence base to provide high-level assurance that the transport impacts of the development have been assessed and the mitigation (which in line with **DfT Circular 01/2022 – Strategic Road Network and the Delivery of Sustainable Development** is primarily based on sustainable travel interventions) is sufficient.
94. The **NPPF sets out in paragraph 110** the expectations when allocating sites in development plans, or for specific applications for development. The criteria focus on opportunities for sustainable transport modes, safe access for all users, street and parking design, and cost-effective mitigation of impacts on the transport network. **Paragraph 111** states: "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*" It is further noted that DfT Circular 01/2022 – Strategic Road Network and the Delivery of Sustainable Development heavily encourages sustainable travel interventions over 'predict and provide'.
95. The **Council's statement for Matter 6 Issue 1** (in particular **Question 2**) summarises the work undertaken by the Council to strategically assess the impacts of the Plan on transport. That statement confirms the significant involvement of both West Sussex County Council as the local transport authority, and National Highways. Both have signed Statements of Common Ground (**DC11** and **DC15** respectively) indicating support for the Council's approach, and agreeing that the mitigation proposed is sufficient.
96. The **Horsham Transport Study (I06)** used strategic modelling to compare traffic flows and junction delays in 2039 using a 'reference case' versus a 'with Local Plan' scenario. The reference case represents a do-nothing approach whereby only background traffic growth is modelled and there are no new site allocations. The '2039 Local Plan Scenario' looks at cumulative impacts across the study area (which goes slightly beyond the District boundaries). **Chapter 5** of the Study examines the modelling results, and includes **Tables 5-1, 5-2, 5-4 and 5-5** showing what happens at the road junctions across the District where there are capacity issues or where the local plan has a significant impact on the

capacity at the junction. **Paragraphs 5.2.22 onwards** identifies the junctions that see a greater than 1.5% ‘worsening’ of congestion (based on volume to capacity ratio) and then identifies where mitigation is required. It should be noted that the analysis considers the impact of all development over the Plan period, and does not individually analyse the impact from specific sites.

97. Table 2 below lists junctions in the wider vicinity of the site which see a more significant increase in delay. Commentary taken from the study to explain the recommended mitigation is given.

Table 2: Junctions in Horsham District close to Land North West of Southwater site (see Horsham Transport Study (106) Figures 5.1 and 5.2 for locations)

| Junction (location ref) | Impact and proposed mitigation (from paragraphs 5.2.23 to 5.2.39) |
|-----------------------------------|---|
| Hop Oast Roundabout (location 19) | The junction is above capacity and worse than the Reference Case within the preferred scenario. The main congestion hotspots stem from the large traffic volume approaching the junction along the A24, causing limited gap time for vehicles to exit onto the roundabout from Worthing Road. A solution for mitigation would be to signalise the roundabout, therefore managing traffic flow and providing greater capacity for these movements. T |
| A24 / A272 Buck Barn (Location 2) | The junction is over capacity within all approaches, with limited scope for further signal optimisation improvements. Potential further dedicated left and right turn lane filtering and bypassing the interchange would improve the capacity and performance of the junction. |

98. The Council considers that mitigation of Land North West of Southwater impacts on the road network are best considered at the planning application stage, jointly with West Sussex County Council and the applicant. Whilst there are known to be impacts on the Hop Oast roundabout and the Buck Barn junction, future capacity issues also relate to wider growth and will need to be considered in the context of strategic-level as well as potentially scheme-specific funding. The Council confirms that measures to mitigate the local impacts are under active consideration as part of a package of measures focused on optimising necessary journeys being made through active travel or public transport which will make the most of the site’s sustainable location next to the A24.

[e\) Have the air quality impacts been adequately assessed and is the mitigation proposed sufficient?](#)

99. The **Site Assessment Report (H11)** assesses the air quality impacts and confirms the site is not located in an Air Quality Management Area, and that overall, the rating given to “Environmental Quality” (Soil/ Air /Water) is neutral. It is also noted that Berkeley Homes published an Air Quality Statement (September 2022), as part of the evidence base for the planning application DC/22/1916/OUT for a mixed-use strategic development for 1,500 dwellings, plus significant associated infrastructure, for this site in October 2022.

100. There are no air quality management areas in the immediate vicinity, the nearest being Cowfold (9.7km drive distance via the A272) and Storrington (19.2km drive distance via the A283). Neither are on the main A24 route onto which development traffic will discharge.

101. The justification text in the Plan states that a comprehensive masterplan has been developed to ensure that issues such as: biodiversity net gain, heritage, carbon neutrality, air quality, and noise impact and water neutrality are comprehensively addressed ahead of any development taking place.

[f\) Have water and flooding impacts been adequately assessed and is the mitigation proposed sufficient?](#)

102. It is considered that water and flooding impacts have been adequately assessed and the mitigation proposed is considered sufficient. The **Site Assessment Report (H11)** considers the issue of water neutrality and states that any allocation would need to be in conformity with the wider strategic offsetting scheme which has established the potential to deliver a level of offsetting over the Plan period. Development would also need to be in accordance with the relevant Local Plan policies on water neutrality. The annual water consumption for the residential part of the proposed development is 85 litres/person/day. This is in line with the Council's water neutrality strategy. For water demand that cannot be offset on-site, the Council can advise that the development will have access to water credits generated under the local authority-led SNOWS scheme, to aid in the achievement of water neutrality.
103. The site is located in Flood Zone 1, with a low risk of tidal and fluvial flooding and has passed the sequential test (see the **Sequential and Exception Flood Risk Tests** report, **CC04b**). There are no main rivers in proximity to the site. The site is not located within a Groundwater Source Protection Zone. In terms of surface water flooding, the Environment Agency's surface water flood risk mapping also shows the majority of the site as having very low or low surface water flood risk.
104. Nevertheless, development would be required to comply with Strategic Policy 10: Flooding. This requires that criteria are observed which safeguard against future flooding issues, and requires submission of a flood risk assessment and demonstrate appropriate provision of surface water mitigation (such as SuDs).
105. It is noted that Berkeley Homes published a Water Resources, Flood Risk and Drainage Statement (September 2022) as part of the evidence base for the (now withdrawn) planning application for this site in October 2022.

[g\) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation proposed sufficient?](#)

106. Yes, it is considered that heritage, biodiversity and landscape impacts have been adequately assessed and that the mitigation proposed is sufficient. These matters have been considered as part of the **Site Assessments Report (SAR) (H11)**.
107. There are 24 listed buildings within a 500m study radius of the site, one of which is Grade II* (Great House Farmhouse) and 23 are Grade II. There are also two Grade II* listed buildings located just outside of the study area to the northwest at Christ's Hospital School. There are 10 Parish Heritage Assets within Southwater Parish, which have been identified via the Southwater Neighbourhood Plan and are treated as non-designated heritage assets. Three inter-connected barns at Great House Farm, located within the site, are additionally regarded as non-designated heritage assets.
108. The **Site Assessment Report (SAR) (H11)** sets out some details on how the site promoter has sought to mitigate the heritage impacts, and the masterplan has evolved to reflect the constraints and opportunities associated with the site, in particular ensuring that Great House Farm will be provided with a proportionate size of private grounds for it to retain its original character.
109. With regards biodiversity, the SAR assesses that there is a reasonable prospect of negative impacts being mitigated and the rating of "neutral" is given. The site contains a number of biodiversity assets, such as areas of ancient woodland (Courtland Wood, Two Mile Ash Gill and Smith's Copse), which are located on the western and eastern edges of the site. These would be retained as part of the proposals for green infrastructure on the site. There are known to be protected species present. However part 4 of the policy sets out the requirement for a comprehensive Ecology and Green Infrastructure Strategy, incorporating a Biodiversity Net Gain plan to demonstrate how a minimum 12% net biodiversity gain will be achieved. The criteria (a) to (d) provide a fine-grained framework to ensure that developers take all necessary actions to protect and enhance a number of natural environment assets.
110. Turning to landscape, the main landscape constraints on the site relate to the three areas of Ancient Woodland within the site (Courtland Wood, Two Mile Ash Gill and Smith's Copse) and the Public Rights

of Way network within the central and southern part of the site, including the Downs Link Way. The westernmost section of the site is particularly rural in character and there are currently very limited urban influences in this area. The **Landscape Capacity Study (EN08)** assesses the area within which the site falls as having either moderate or low/no capacity for large scale development, however the SAR notes earlier changes to the masterplan prior to Regulation 19 stage, including a reduction in scale from 1,500 to 1,000 homes, which have been considered as being effective in mitigating impacts and concludes a 'neutral' rating for landscape.

[h\) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?](#)

111. Yes, it is considered that the infrastructure requirements identified are reflective of the latest evidence and are justified and effective. In terms of being justified, the **West Sussex County Council Statement of Common Ground (DC11)** confirms that the Plan (as suggested to be modified) and **Infrastructure Delivery Plan (SP04)** provide sufficiently for education, transport, flood risk, libraries and fire and rescue services. For all types of infrastructure, the Infrastructure Delivery Plan is considered comprehensive. The evidence supporting the identification of infrastructure needs is set out in various documents contained within the examination library. In terms of being effective, the **Horsham Local Plan Viability Assessment (H12)** includes a chapter on each of the strategic sites. **Paragraph 8.106** concludes there "are no confirmed infrastructure constraints that prevent the site from being delivered".

Question 11: Is Strategic Policy HA4: Land East of Billingshurst sound?

[a\) What is the justification for the proposed number of dwellings and employment in total and over the Plan period?](#)

112. Strategic Policy HA4 allocates Land East of Billingshurst as a comprehensive new neighbourhood which will deliver approximately 650 homes within the Plan period. Outside of Horsham Town, Billingshurst is one of the largest settlements within the District, with a train station providing a rail service to Horsham and London and good road access via the A29 and the A272.

113. The overall site capacity has been informed by the site's assessment (see **Site Assessment Report (H11) Part B, page 40 to 51**), having regard to a number of site constraints and land budget requirements for supporting infrastructure and also land take for a new primary school to be provided by the Department of Education. It has also considered discussions with the promoters, Bellway Homes and Crest Nicholson, whose representation on HA2 (**response ref: #1194442**)⁶ supports the provision of 650 dwellings. It should be noted that in response to **Matter 9, Issue 1, Question 2** the Council has suggested a in **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024 (SM55)** which would lead to an amend to **criterion 2(a) of the policy** and would replace 'at least 650 residential units' with 'approximately 650 residential units' for internal consistency with **paragraph 10.125** of the Plan which expects provision to be within 10% of the figure quoted in policy.

114. The **Housing Delivery Study (H02)** and **Housing Delivery Study Update (H03)** address build-out rates in light of past build-out rates, direct engagement with the site promoters, and the Council's evidence on viability and infrastructure delivery. Their findings are reported in the **Housing Delivery Study Update (H03) paragraphs 4.58 to 4.69 and Table 6.1**, and concluded, taking into account **paragraphs 4.104 and 5.33** and reflecting build out in 7-10 years, that 650 homes could be completed by the end of the Plan period.

115. The Council's overall approach to calculating future housing supply (the 'housing trajectory') is explained in **Topic Paper 2: Housing Supply (HDC03)**, with the detailed figures shown on page 3 of **Appendix 1 to HDC03**. It is considered, as noted by the promoters in paragraph 1.6 of their main

⁶https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/showUserAnswers?qid=9331459&voteID=1194442&nextURL=%2FRegulation%5F19%5FLocal%5FPlan%2FquestionnaireVotes%3Fqid%3D9331459%26status%3Dcomplete%26sort%3Drespondent%5F%5FcommonName%26dir%3Dasc%26showNum%3D10%26startRow%3D1%26search%3DBellway

Regulation 19 Representation Statement (**response ref: #1194442**), that the promoters are ready to progress a planning application following constructive pre-application discussions. There is therefore a good chance that completions on Land East of Billingshurst will start 2026/27 with full build out complete 2032/34.

116. In terms of employment, HA4 part 2(c) states that around 0.5 hectares of employment floorspace shall be provided (office, including flexible desk space, industrial, storage, and / or distribution) within one or both of the following locations i) the community hub; ii) land adjacent and to the east of Rosier Business Park. This is supported by the promoters on page 35 of their main Regulation 19 Representation (**response ref: #1194442**). **Page 48 of the Site Assessment Report (H11)** records that the site promoter is seeking to provide an expansion of the existing Rosier Business Park with uses that complement the existing mix of employment uses, and also a community hub including flexible commercial units. Delivery of the employment is to be phased as appropriate with housing and delivered within the Plan period.

[b\) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?](#)

117. Yes. There is a clear evidence base to provide high-level assurance that the transport impacts of the development have been assessed and the mitigation (which in line with **DfT Circular 01/2022 – Strategic Road Network and the Delivery of Sustainable Development** is primarily based on sustainable travel interventions⁴) is sufficient.

118. The **NPPF sets out in paragraph 110** the expectations when allocating sites in development plans, or for specific applications for development. The criteria focus on opportunities for sustainable transport modes, safe access for all users, street and parking design, and cost-effective mitigation of impacts on the transport network. **Paragraph 111** states: “*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*” It is further noted that DfT Circular 01/2022 – Strategic Road Network and the Delivery of Sustainable Development heavily encourages sustainable travel interventions over ‘predict and provide’.

119. The **Council’s statement for Matter 6 Issue 1 (in particular Question 2)** summarises the work undertaken by the Council to strategically assess the impacts of the Plan on transport. That statement confirms the significant involvement of both West Sussex County Council as the local transport authority, and National Highways. Both have signed Statements of Common Ground (**DC11** and **DC15** respectively) indicating support for the Council’s approach, and agreeing that the mitigation proposed is sufficient.

120. Part 8 of the policy requires submission of a comprehensive transport strategy focused on sustainable and active travel. Such measures will be reinforced through a comprehensive travel plan and construction travel plan.

121. The **Horsham Transport Study (I06)** used strategic modelling to compare traffic flows and junction delays in 2039 using a ‘reference case’ versus a ‘with Local Plan’ scenario. The reference case represents a do-nothing approach whereby only background traffic growth is modelled and there are no new site allocations. The ‘2039 Local Plan Scenario’ looks at cumulative impacts across the study area (which goes slightly beyond the District boundaries). **Chapter 5** of the Study examines the modelling results, and includes **Tables 5-1, 5-2, 5-4 and 5-5** showing what happens at the road junctions across the District where there are capacity issues or where the local plan has a significant impact on the capacity at the junction. **Paragraphs 5.2.22** onwards identifies the junctions that see a greater than 1.5% ‘worsening’ of congestion (based on volume to capacity ratio) and then identifies where mitigation is required. It should be noted that the analysis considers the impact of all development over the Plan period, and does not individually analyse the impact from specific sites.

122. The **Horsham Transport Study (I06)** identifies two junction congestion hotspot that require highway mitigation that could be affected by the HA4 Land East of Billingshurst Site. There is another junction near the site, which is seen to be only just over the threshold that could be dealt with through measures

to reduce car trips, such as, the prioritisation of active modes, where specifically feasible to reduce localised car trips further, and the general projection of virtual mobility (i.e. increased opportunity to work from home, due to technological advances reducing need to commute and reduce face to face meetings). Table 3 below lists these respective junctions in the wider vicinity of the site which see an increase in delay. Commentary taken from the study to explain the recommended mitigation is given.

Table 3: Junctions in Horsham District close to Land East of Billingshurst site [see Horsham Transport Study (106) Figure 8.1 for locations]

| Junction (location ref) | Impact and proposed mitigation (from paragraphs 5.2.23 to 5.2.39 and paragraphs 8.3.1 to 8.3.7) |
|---|--|
| A24 / A272 Buck Barn (Location 2) | <p>The junction is over capacity within all approaches, with limited scope for further signal optimisation improvements. Potential further dedicated left and right turn lane filtering and bypassing the interchange would improve the capacity and performance of the junction.</p> |
| A29/ A264 Five Oaks Roundabout (Sustainable Measures) (Location 5) | <p>Northbound approach showing an increase of traffic from the East of Billingshurst site.</p> <p>Roundabout has limited scope for improvements due to physical constraints. Due to the constraints of delivering physical mitigation, viable options of mitigating the impacts of the Local Plan, in the main coming from trips produced by the East of Billingshurst development, would require significant increases in sustainable transport measures for Billingshurst. It would be expected that these would be provided through the transport strategy promoted by the East of Billingshurst developers, in particular providing improved public transport services from East of Billingshurst to Horsham which would potentially reduce private vehicle demand through the junction.</p> |
| A283 /A29 Roundabouts, Pulborough (Sustainable Measures) (Location 6) | <p>The junction is seen to be only just over the threshold based on the preferred strategy.</p> <p>Mitigation could include a metering scheme whereby traffic lights are put on the A283 east and west approaches to the double roundabout junction (but not the A29 approaches) to allow A29 traffic to be prioritised when necessary. The SATURN model is not suitable for modelling this type of mitigation accurately and would require modelling in a microsimulation modelling tool such as VISSIM or Paramics.</p> <p>Alternatively, sustainable transport mitigation would be required, linking Public Transport to/through Pulborough. Due to the semi-rural locality of the site and the low frequency of bus services, solutions brought forward should include demand</p> |

responsive measures linked to the Pulborough station.

Furthermore, The Arundel Bypass, currently being progressed by National Highways could provide relief along the A27 at Arundel, which will make the A27/A24 route from Chichester and further west towards Horsham, Crawley and Gatwick Airport a more attractive route, which could result in some traffic being removed from Pulborough and provide relief at the junctions.

123. The Council considers that mitigation of Land East of Billingshurst impacts on the road network are best considered at the planning application stage, jointly with West Sussex County Council and the applicant, given most of the improvements required are relatively low-cost interventions. The exception is the Buck Barn junction, however future capacity issues here also relate to wider growth and will need to be considered in the context of strategic level funding. The Council confirms that measures to mitigate impacts are under active consideration as part of a package of measures focused on optimising necessary journeys being made through active travel or public transport which will make the most of the site's sustainable location next to the A272 and near the A29, with a train station linking Billingshurst sustainably to other locations including Horsham and London. In respect of the latter, **criterion 6(a) of the policy and paragraph 10.114 of the Plan** seek to facilitate the increased use of rail travel through a requirement to provide a new station car park within the site which would provide wider opportunities for sustainable travel choices.

124. It is also noted the site promoters have submitted as part of their Regulation 19 representation (**#1194442**)⁷ a Technical Note dated March 2024 which summarises key constraints of the site and how it has been proposed to overcome them. It covers Transport, Flood Risk and Drainage, Noise and Air Quality. This shows they are exploring these matters and looking to resolve any issues as appropriate to the delivery of the development.

125. The policy when read with Strategic Policies 24 and HA1 of the Plan and all other relevant policies of the Development Plan will ensure any future development has regard to all necessary evidence, and appropriately assesses its impacts and provides all necessary mitigation.

c) Have the air quality impacts been adequately assessed and is the mitigation proposed sufficient?

126. Yes, the air quality impacts have been adequately assessed. **Paragraphs 2.6 and 2.7** of the **Habitats Regulations Assessment Air Quality Addendum (SD09)** makes clear that no adverse effects on the integrity of The Mens SAC is expected from the Plan alone. However, **paragraph 2.8 and 3.2** of the **Habitats Regulations Assessment Air Quality Addendum (SD09)** makes clear that the 'in combination' ammonia (NH₃) will exceed 1% of the critical level for sites supporting lichens and bryophytes, in this case The Mens Special Area of Conservation (SAC), by 2032-2035 without mitigation taking place. This effect on integrity applies to approximately 2% of The Mens SAC / within 20m from roadside of the A272. This arises due to the increase in combustion engine vehicle traffic flow, primarily petrol particularly those with catalytic converters, on the A272 past The Mens SAC.

127. **Paragraphs 2.3 and 3.5** of the **Habitats Regulations Assessment Air Quality Addendum (SD09)** and **paragraph 1.6** of the **Habitats Regulations Assessment Air Quality Mitigation Strategy (SD10)** highlight that half of the traffic flow increase is attributable to **the Plan (SD01)** and that approximately a

⁷https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/showUserAnswers?qid=9331459&voteID=1194442&nextURL=%2FRegulation%5F19%5FLocal%5FPlan%2FquestionnaireVotes%3Fqid%3D9331459%26status%3Dcomplete%26sort%3Drespondent%5F%5FcommonName%26dir%3Dasc%26showNum%3D10%26startRow%3D1%26search%3DBellway

third, 32%, of the increase attributable to the Plan stems from Strategic Policy HA4 Land East of Billingshurst strategic site (which equates to a sixth overall).

128. **Paragraphs 2.4, 2.5, 2.7, 2.18 and Table 1** of the **Habitats Regulations Assessment Air Quality Mitigation Strategy (SD10)** highlight the importance of the provision of mitigation measures by/within development at Land East of Billingshurst in order to incentivise the uptake of ultra-low emission vehicles (ULEVs) to help provide the necessary shift as detailed above. The **Glossary** and **Appendix A, paragraph 3.1** of the **Habitats Regulations Assessment Air Quality Mitigation Strategy (SD10)** highlight the main focus needs to be a shift from petrol vehicles to ULEVs because petrol vehicles (particularly those with catalytic converters) emit more ammonia than diesel.
129. **Strategic Policy HA4 Land East of Billingshurst** makes clear, in its supporting text paragraph 10.116 of the Plan, the importance of a comprehensive Travel Plan as required by criterion 6(g) of the policy. In addition to this, in respect of this paragraph, the Council has also suggested **modification HM087** within the **HDC Schedule of Suggested Modifications to the Regulation 19 Local Plan (SD14)** to highlight, and to help ensure suitable mitigation for, the latest findings of the **Habitats Regulations Assessment Air Quality Addendum (SD09)** and the **Habitats Regulations Assessment Air Quality Mitigation Strategy (SD10)**.
130. The Council therefore considers that Strategic Policy HA4 Land East of Billingshurst ensures development of the site will provide appropriate mitigation for the air quality impacts it generates. Supporting **paragraph 10.116** and **Criterion 6 of the policy** requires a comprehensive transport strategy, a Travel Plan and Construction Travel Plan, and the provision of electric vehicle charging points for all car parking spaces to help mitigate air quality impacts on The Mens.
131. In summary, the Air Quality Addendum identifies a strategic solution which will involve monitoring vehicle types (in particular petrol versus electric vehicles) to jointly implement with Chichester District Council (see **paragraph 3.2, as well as paragraphs 2.5, 2.7, 2.9, 2.19 and 2.20 of the Addendum, SD09**).
132. It is also noted the site promoters have submitted as part of their Regulation 19 representation (**#1194442**) a Technical Note dated March 2024 which summarises key constraints of the site and how it has been proposed to overcome them. It covers Transport, Flood Risk and Drainage, Noise and Air Quality. This shows they are exploring these matters and looking to resolve any issues as appropriate to the delivery of the development.
133. The policy when read with Strategic Policies 12, 24, 25 and HA1 of the Plan and all other relevant policies of the Development Plan will ensure any future development has regard to all necessary evidence, and appropriately assesses its impacts and provides all necessary mitigation.
134. The **Council's response to Matter 1, Issue 2, Questions 6 and 7** provides further information on the wider impacts of the Plan on air quality at The Mens SAC and any mitigation that may be necessary.

[d\) Have water and flooding impacts been adequately assessed and is the mitigation proposed sufficient?](#)

135. Yes, water and flooding impacts have been adequately assessed and the mitigation proposed is considered sufficient. **Part B, pages 43 and 44** of the **Site Assessment Report (H11)** provides an overview of the consideration of this issue.
136. In terms of water supply, the Council can advise that the development will have access to water credits generated under the local authority-led SNOWS scheme, to aid in the achievement of water neutrality. Development would also need to be in accordance with Strategic Policy 9: Water Neutrality. The annual water consumption for the residential part of the proposed development is 85 litres/person/day. This is in line with the Council's water neutrality strategy. Further information in respect of water neutrality is provided in the **Council's response to Matter 3, Issue 1**.
137. In terms of flooding, as reflected on **pages 43 and 44** of the **Site Assessment Report (H11)** the site is located in Flood Zone 1, with a low risk of flooding, and is not located within a Groundwater Source

Protection Zone. This is evidenced in the **Strategic Flood Risk Assessment Update (CC04)**, particularly Appendix A Figures A6-C, A7-C, A8, A9-C, A10-C, A11, A12-C and Appendix B map B4. The **Strategic Flood Risk Assessment Update Sequential and Exception Flood Risk Tests (CC04b)** shows the site passes the sequential test.

138. It is also noted the site promoters highlight in their main Regulation 19 Representation Statement (**#1194442**), **paragraph 4.11** regarding SA12 Flooding, that a small proportion of the site is susceptible to surface water flooding, however in accordance with **Strategic Policy 10: Flooding**, surface water management will utilise the SuDS approach to balance surface water flows and provide further, water quality, amenity and biodiversity benefits. The site promoters also submitted as part of their Regulation 19 representation a Technical Note which summarises key constraints of the site and how it has been proposed to overcome them. It covers Transport, Flood Risk and Drainage, Noise and Air Quality. This shows they are exploring these matters and looking to resolve any issues as appropriate to the delivery of the development.
139. The policy when read with Strategic Policies 9, 10, HA1 of the Plan and all other relevant policies of the Development Plan will ensure any future development has regard to all necessary evidence, and appropriately assesses its impacts and provides all necessary mitigation.

[e\) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation proposed sufficient?](#)

140. Yes. The issues of heritage, biodiversity and landscape have all been assessed and an overview is provided in the **Site Assessments Report (SAR) (H11) (Part A, and Part B, pages 41 to 43, 49 and 50)**. Landscape is assessed as having 'neutral impacts' and biodiversity and heritage are both assessed as having 'unfavourable impacts (where there is potential for mitigation)'.
141. Regard has been given to the **Landscape Character Assessment and Maps, 2003 (EN05)** (the site lies in character area G3, of particular relevance are **pages 83 to 85, 195 to 197**, including **Figures 7.15 and 7.16**), the **Landscape Capacity Study, 2021 (EN08)** (the site lies in local landscape character area 48 as shown on Maps 1, 2, Zone 4a and Zone 4b, which is covered in the main report **pages 57 and 68**), the **Horsham Biodiversity Net Gain Assessment (EN06)** (particularly **Tables 1, 3 and 4 and paragraph 5.2**, and the **Cultural Heritage Assessment, 2024 (EN09) (Part E, pages 25 to 32)**, and any application will be expected to take into account their findings as appropriate.
142. The Council's illustrative masterplan for the site, **Figure 9** of the Plan depicts a landscape-led approach and takes into account biodiversity and heritage. The policy when read with Strategic Policies 11, 13, 17 and HA1 and Policy 21 of the Plan will ensure any future development has regard to all necessary evidence, and appropriately assesses its impacts and provides all necessary mitigation.

[f\) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?](#)

143. Yes, the infrastructure requirements identified based on the latest evidence are considered justified and effective. The **West Sussex County Council Statement of Common Ground (DC11)** confirms that the Plan (as suggested to be modified) and **Infrastructure Delivery Plan (SP04)** provide sufficiently for education, transport, flood risk, libraries and fire and rescue services. For all types of infrastructure, the **Infrastructure Delivery Plan (SP04)** is considered comprehensive. The evidence supporting the identification of infrastructure needs is set out in various documents contained within the examination library.
144. The development of the site would be expected to meet all relevant policies of the Plan, including the open space standards set out in Table 4 of Policy 28: Community Facilities and Uses. Regard will also be given to the **Open Space, Sport and Recreation Review (I04)**, including Appendix One, particularly **pages 112 and 113** which set out the generated requirements for the site in respect of open space, playing pitch and built sports facilities (based on Sport England calculators).
145. In terms of effectiveness of delivery, the **Horsham Local Plan Viability Assessment (H12)** includes a chapter on each of the strategic sites which considers the costs of infrastructure to support the site's

development. **Paragraphs 8.16 to 8.32** indicate that the development proposed is deliverable. Paragraph 8.32 concludes that “*Assuming there are no contractual minimum payments (i.e. as stated in their July 2021 submission), then we are satisfied there are no significant delivery concerns*”.

146. The Council’s illustrative masterplan for the site, **Figure 9** of the Plan depicts the broad locations for the uses and infrastructure to be provided on site. This reflects discussions with West Sussex County Council and the site promoters in respect of the relocation of the primary school which is currently secured on land in the north of the site by virtue of the Ambleside Green development to the north/northwest of the site. The masterplan therefore makes clear the provision of a primary school, with land that meets at least the minimum recommended standards, is a requirement, and if relocated the land currently secured for the school could be developed for housing with appropriate open space, landscape and active travel links.