



Horsham  
District  
Council

# Horsham District Local Plan

Regulation 19 Summary of Representations

Appendix 1

July 2024



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## Chapter 1: Introduction

<b>Object – Chapter 1</b>	
<b>Number of Comments</b>	<b>8</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> Horsham District Scouts did not consider the Plan strategy has been developed to reflect the needs of young people.	
Others commented that they did not agree with the way various evidence base documents have been considered, and the weight they were given, in the development of the strategy.	
<u>Developers and Agents</u> A comment received objected to the restriction of the scale of housing growth below the objectively assessed need.	

<b>Observation – Chapter 1</b>	
<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> Save West of Southwater and the Stammerham Amenity Association noted the overall requirement outlined in Chapter 1 that the plan must demonstrate water neutrality.	
<u>Parish Council</u> Ashington Parish Council made reference to paragraph 1.12 stating that it is not possible to respond with a simplistic support or object to the Plan as a whole. They felt it more pertinent that parishes either support or raise objections to their own parish issues, as well as providing general feedback.	
<u>Statutory Consultees</u> Crawley Borough Council commented that reference in paragraph 1.7 appears to assume knowledge of what the Position Statement means and provided detail about the background to the Position Statement and the reason behind why water neutrality is needed. Further, CBC noted reference to the plan period in paragraph 1.2 and consideration of a 30 year context for strategic scale development. They identified concern that the plan says very little about the longer strategic context and infrastructure needs relating to potential development at West of Crawley and that they would prefer there to be greater certainty in relation to this.	

<b>Support – Chapter 1</b>	
<b>Number of Comments</b>	<b>2</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> A comment registered their support for the strategy.	
<u>Statutory Consultees</u>	

Mid Sussex District Council supported the approach to assessing housing need through the joint working of the North West Sussex Housing Market Area, and the use of the evidence base documents to support the proposed strategy.

## Chapter 2: Planning Context

<b>Object – Chapter 2</b>	
<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Save Rural Southwater and the Stammerham Amenity Association objected to the plan’s approach to achieving water neutrality, stating the approach is based on aspirations and theoretical assumptions. They also object to the definition of water neutrality included in paragraph 2.9 which they state implies water for non-drinking is not subject to restriction. They propose this should be amended to make clear water neutrality covers all water drawn from the mains water supply, whatever the end use.	
<u>Developers and Agents</u>	
A comment was made objecting to the approach taken to meet Duty to Cooperate requirements (highlighted in para 2.5). They stated:	
<ul style="list-style-type: none"> <li>- Authorities within the North West Sussex Housing Market Area (NWSHMA) are not working to establish a need with the HMA and how this can be met, instead establishing what cannot be provided</li> <li>- Water neutrality is not justification for not accounting for, or planning for, the assessed need</li> <li>- The shortfall across the HMA of dwellings being planned for will have socioeconomic consequences, impacting the housing shortage</li> <li>- There is engagement between affected authorities stating they cannot meet others’ unmet need because of water neutrality and this has been used as a basis for the water neutrality mitigation strategy and results in an artificially low number of homes being used as a basis for water neutrality mitigation</li> <li>- More work is required between authorities to find solutions to meet an increasing need.</li> </ul>	
<u>Statutory Consultees</u>	
The South Downs National Park Authority pointed out that wording in paragraph 2.12, and in other sections of the Plan, should be updated to reflect amendments to legislative requirements made through the Levelling Up and Regeneration Act (LURA) 2023 in relation to National Parks and relevant bodies such as HDC.	

<b>Observation – Chapter 2</b>	
<b>Number of Comments</b>	<b>4</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
The Sussex Ornithological Society support the approach to water neutrality taken by the plan providing there is remedial action taken if water consumption targets cannot be met in reality.	

Comments were made in relation to the status of Neighbourhood Plans in relation to the Local Plan, and the need for a timetable for the review of Neighbourhood Plans which no longer align to local or national planning policy.

Parish Councils

Ashington Parish Council made reference to two paragraphs:

- 2.4 – They commented that they have a ‘Made’ Neighbourhood Plan and were fortunate to be afforded some level of “security” in terms of proposed development. They continued by explaining that for those who do not have a ‘Made’ Plan, the Council must give weight to existing consultations and work carried out to ensure the integrity of the process. The possibility of unsustainable development places additional pressure on Ashington.
- 2.6 - They have concerns over the validity of some of the research undertaken and found it disappointing to see new documents added to the evidence base after the consultation period had started, such as the HDLP Regulation 18 Consultation Report (Jan 24). The evidence base was out of date in some areas, creating conflicting data such as the housing number proposed for Ashington.

West Chiltington Parish Council also commented that draft Neighbourhood Plans that have not been made, due to reasons beyond the control of Parish Councils, should be given significant weight.

Statutory Consultees

Natural England provided advice in relation to the “duty of regard” which places a duty on local authorities making planning decision which will affect National Landscapes (AONBs). They state the government guidance is anticipated, but point out that:

- The duty to “seek to further” the statutory purpose of the area is active, not passive
- The duty goes beyond mitigating harm, or providing like for like replacement, and focuses on avoiding harm and to further the conservation and enhancement of protected landscapes, and
- Any proposed measures to further the purpose of the area should be aligned with the aims and objectives of the designated landscape’s statutory management plan, with consultation with the relevant body.

**Support – Chapter 2**

<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Statutory Consultee</u>	
Surrey County Council welcomed reference to the supply of minerals in paragraph 2.10.	

**Chapter 3: Spatial Vision and Objectives**

**Object/Observation/Support – Chapter 3**

<b>Number of Comments</b>	<b>20</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Save Rural Southwater and the Stammerham Amenity Association objected on the following grounds:	

- The Local Plan does not allow Southwater residents a say in how the community evolves through Neighbourhood Plans, contrary to para 3.29
- The allocation at Land Northwest of Southwater conflicts with Objectives 1, 3, 4 and 10 of the Local Plan

These points were mirrored by a number of individual respondents.

The Campaign to Protect Rural England requested an acknowledgement of the link between nature and biodiversity and health and wellbeing.

Other comments included:

- Support recognition of hybrid working arrangements, and further focus is required to establish how the needs of rural home-based workers can be met
- Support for environment and biodiversity
- The Plan fails to address the impact that development will have on the environment

Sussex Ornithological Society made a comment of support for the declarations of climate and biodiversity emergencies made, and the recognition that this brings about challenges associated with development.

#### Parish Council

Ashington Parish Council objected to paragraph 3.2, commenting that it is unclear how the Plan will address wider infrastructure investment. Their view was that an additional 300 homes in Ashington would add pressure to already busy roads, with no proposed additional infrastructure upgrade.

Cowfold Parish Council objected to the spatial strategy, and the settlement classification of Cowfold, which they state does not place adequate weight on the designated Cowfold Air Quality Management Area (AQMA). In addition, they do not feel enough consideration has been given to the impact that rural development will have on car usage and vehicle movements passing through the AQMA.

North Horsham Parish Council made the following comments:

- That North Horsham should be considered as distinct from Horsham town with its own character and requirements
- There should be a definition of “affordable housing” in the chapter
- Objective 9 does not acknowledge the need for neighbourhood services and facilities outside of town / village centres, which help enable more sustainable communities.

Shermanbury Parish Council commented that there is currently no mention of the Low Weald and the Adur River, suggesting that this should be referred to in the chapter. They commented that the Mock Bridge and further south Bines Bridge have already been closed due to increased flow and high tides and that building on the Low Weald could result in many roads being closed for an increased number of days.

Thakeham Parish Council indicated support for the Local Plan’s objectives and felt that they aligned with their plans.

West Chiltington Parish Council made the comment that the Local Plan recognises that there is an existing infrastructure deficit but doesn’t have policies to address this issue. They continued by explaining that their view is that a deficit in transport infrastructure is particularly marked in small and medium sized villages.

#### Developers and Agents



Comments were made in support of the overarching vision and spatial objectives outlined in the chapter, but questioned the extent to which the policies in the Plan facilitate these being achieved. Another set of comments supported the section of the plan but thought that the objectives would not be met by not planning to meet needs in Horsham or in neighbouring authorities.

A comment was made supporting the objective to grow employment uses in Horsham District to prevent becoming a dormitory but that further land should be allocated to meet this objective.

Statutory Consultees

Network Rail supported the vision and objectives, in particular the vision of a low carbon economy and non-car based transport, with improvements active and public transport.

Natural England supported the vision for the environment outlined in paragraph 3.1, but considered references to the following should be added or strengthened:

- nature based solutions for climate change adaptation,
- conserving the landscape as well as ecological resources,
- green infrastructure network and a local nature recovery strategy

## Strategic Policy 1: Sustainable Development

<b>Object – Strategic Policy 1</b>	
<b>Number of Comments</b>	<b>16</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Comments were made on a range of issues linking through to other policies in the Plan reflecting the introduction to Chapter 4. Comments summarised here do not include those made on other Plan policies. The points raised against this policy in particular are:	
<ul style="list-style-type: none"> <li>- Policy requires an additional criterion to clarify that proposals not meeting the first two criteria are refused.</li> <li>- When the relevant policies are out of date they should be considered as still remaining active until that policy is superseded by a replacing new policy.</li> <li>- Policy should specify that improving social needs/conditions should include young people.</li> <li>- There should be insistence that neighbourhood plans are reviewed within the life of the Plan.</li> <li>- Policy should not limit development only to that supported in the Local Plan or a neighbourhood plan; to do so will hinder suitable, sustainable development.</li> <li>- Concern that the magnitude of the ‘significant unmet needs’ of neighbouring authorities is not disclosed, given statements in paragraphs 4.9 and 4.20 regarding future lifting of water neutrality constraint.</li> <li>- Regarding paragraph 4.21, Plan should give an undertaking that work to determine potential principle and location of a new settlement/strategic development should begin sooner/within 2 years.</li> </ul>	
<u>Parish Council</u>	
Ashington Parish Council commented on the second paragraph of SP1, advising that this statement is concerning, and that clarity is required. Their view was that the planning process must not be unduly weighted to approval as this undermines the integrity of the whole system. They opined that housing numbers must not be prioritised over careful scrutiny of all planning applications.	

North Horsham Parish Council raised concern on issues they also covered in more detail elsewhere in the Plan.

West Chilmington Parish Council took issue with the reference to ‘without delay’ and felt this should be reconsidered or properly defined, commenting that scrutiny is important for fairness of all stakeholders and without delay may leave no time for material considerations to be uncovered and recognised.

#### Developers and Agents

Some developers argued that sustainable development can only/best be achieved by allocating sufficient sites to meet objectively assessed need for housing. Some also said the Plan should be meeting unmet needs from neighbouring areas. Particular reasons for objecting included:

- More sites/homes should be located in the southern part of the District for sustainable development to be achieved.
- Wording of paragraph 4.8 is misleading as there is no consideration of the Coastal West Sussex area forming part of a functional economic area. Evidence base is similarly flawed.

#### Statutory Consultees

National Highways requested that the policy should be made stronger through positive responses to the expectations of Circular 01/22. They were of the view that this should include references to reducing the need to travel (particularly by private car) as being pivotal to the definition of “sustainability”.

### **Support – Strategic Policy 1**

<b>Number of Comments</b>	<b>2</b>
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#### **Summary of Comments**

#### Developers and Agents

Two comments were made in support of the policy and suggesting that sustainable development should be enabled in a timely fashion.

## **Strategic Policy 2: Development Hierarchy**

### **Object – Strategic Policy 2**

<b>Number of Comments</b>	<b>39</b>
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#### **Summary of Comments**

#### Members of the Public and community groups

Comments were made in relation to the following:

- Para 4.30 – while agreeing with the sentiment, would like consideration to be given to other means of sustainable transport such as cycling, public transport and electric vehicles.
- Para 4.32, 4.33 and 4.34 – Secondary Settlements should also have defined BUAB to enable these settlements to support their communities and meet local needs in the lifetime of the Local Plan.
- Add new criterion – “2.c) not within a designated conservation area.”
- Strategic Allocation North West of Southwater contradicts supporting text and policy.

#### Parish Council

North Horsham Parish Council objected that North Horsham has not been listed as a settlement in its own right within Table 3.

Colgate Parish Council objected to the current categorisation of Kilnwood Vale as a 'Small Town / Larger Village'. The Parish Council understands that the development will in time provide additional services and facilities, but this will not be for at least 5+ years. At present there is only a primary school and limited bus service, therefore the categorisation of 'Smaller Village' would be more appropriate.

#### Developers and Agents

A comment stated that it is not clear as to what the future status of strategic site allocations, and their associated centres, will be categorised in the development hierarchy and assessed against. They requested 'Land West of Ifield' be added to the Table 3 for clarity and effectiveness.

The majority of objections were received from developers/promoters with the following wide-ranging comments:

- Para 4.14 states that more organic growth is needed to meet local need. Policy 2 should be more flexible in allowing some growth outside of settlements if it meets a specific local need or would contribute to organic growth of smalling groupings of dwellings located in the countryside as this would help support the rural economy and encourage more services.
- Settlement boundaries are a blunt instrument when considering whether development is sustainable or not. Being on the 'wrong' side of a defined BUAB does not make a site any less sustainable or spatially problematic, especially where sites adjoin a boundary.
- Development which is located within the District, but which is located on the edge of Crawley should be addressed within this policy.
- Para 4.31 states that "medium and smaller towns and villages have the potential to address identified local needs. Limited development to meet these needs and support rural services and infrastructure will be supported ...."
- Policy is too restrictive. Allocated sites, sites with permission and sites where the principle of development has been established should be included within a BUAB.
- Add new criterion between 1 and 2 to allow policy to allow development at sustainable sites outside BUABs should water capacity be available.
- Thakeham should be categorised as a 'Medium Village' in line with the recommendation of the Settlement Sustainability Assessment.
- Policy fails all four tests of soundness. The approach to housing allocations, and therefore the development hierarchy, must be reassessed to ensure it is an appropriate strategy informed by agreements with other authorities, so that neighbouring unmet need is accommodated where appropriate to do so.
- Para 4.31 – mid-tier settlements should not be restricted to limited development where it can be demonstrated that appropriate housing needs of the wider District, and potentially beyond, can be met.
- Question as to whether the specific reference to settlements only being those within defined BUABs is consistent with case law. Revise policy to include reference along the lines of 'or it can be demonstrated that the site should be considered part of the settlement as experienced on the ground.'
- Policy 2 and Policy 3 lack cohesion and are therefore ineffective.
- Policy 2 only allows for infill and very limited in scale development. Alongside Policy 14 prevents opportunities for suitably located sites that have a water neutrality solution.
- The Council should allocate more suitable sites, irrespective of water neutrality issue or a more permissive approach to development allowing proposals that adjoin higher tier settlement boundaries, that can demonstrate a water neutrality solution.

A number of comments challenged elements of the evidence base in relation to the BUAB and whether they were accurate or whether the evidence / methodology used was sufficient to justify them. Specific comments included:

#### **BUAB Review**

- A wider assessment must be made regarding the distance of a site from key services and facilities and its landscape value rather than being dictated by a subjectively and tightly drawn line focussing on a central area.
- A number of specific amendments to the BUABs were suggested as follows:
  - Amend Storrington BUAB to include Land South of Sandgate Lane.
  - Amend Storrington BUAB to include the parcels of land to the East and West of Thakeham Tiles
  - Remove proposed BUAB amendment RW1, (Rudgwick). The suitability of the evidence to support this amendment was questioned.
  - Include site SA683 Land East of Highcroft Drive (Rudgwick) within BUAB.
  - Amend Broadbridge Heath BUAB to include Land at Wellcross, Five Oaks Road (SA622).
  - Include Millfields Farm within the Ruser BUAB
  - Amend West Chiltington Common BUAB to include full curtilage of Southmill House
  - Former Thakeham Mushroom site should be included within the Thakeham BUAB.
  - Amend Lower Beeding BUAB to include Land at Sandygate Lane (DC/22/0708)
  - Amend Southwater BUAB to include The Vicarage, two village halls and Southwater Glebe.
  - Include all allocated sites within a defined BUAB.
- Concern was raised that the proposed Southwater BUAB conflicts with that of 'Made' Neighbourhood Plan.

#### **Secondary Settlement Review**

- Object to proposed boundary of Coolham. At Regulation 18, land East of William Penn School, known as 'Land at Home Farm' was included within the proposed boundary. This site has been removed at Regulation 19. Boundary has been drawn too tightly, giving no meaningful contribution to housing delivery in this settlement.

#### Parish Councils

Colgate Parish Council objected to the current categorisation of Kilnwood Vale as a 'Small Town / Large Village'. Though understanding the intention for development to provide additional services and facilities, at present the settlement has minimal available other than a school. Kilnwood Vale is unlikely to have full provision for at least 5+ years. The Parish therefore question if categorisation of 'Small Village' would be more appropriate.

Thakeham Parish Council supported categorisation in settlement hierarchy of Thakeham as a 'Smaller Village'. They explained access to larger settlements for residents of Thakeham is reliant almost entirely upon car journeys.

### **Observation – Strategic Policy 2**

<b>Number of Comments</b>	<b>41</b>
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#### **Summary of Comments**

#### Members of the Public and community groups

Save Rural Southwater and Stammerham Amenity Association commented that:

- Para 4.31 states that "limited development" will be supported to meet local needs and support rural services in medium and smaller towns and the policy categorises

Southwater as a 'Small Town'. They were not of the view that the allocation at Southwater was limited.

- Para 4.33 states that "future growth takes place in a manner that protects, retains and enhances the rural landscape character" and "the expansion of existing settlements must be carefully managed." They were of the view that the proposed expansion conflicts with this policy.

These observations were also reflected by the majority of representations from members of the public. Many also considered that a particular allocation would conflict with the policy by increasing the size of a settlement.

#### Parish Council

North Horsham Parish Council acknowledged wording of para 4.29 in terms of there being a number of health centres and a small hospital located in Horsham, however, concern is raised as to whether this is sufficient and also accessible.

#### Developers and Agents

Representations from agent/developers often acknowledged where a settlement, to which they had interest, had placed in the hierarchy.

#### Statutory Consultees

Network Rail agreed with the settlement hierarchy in terms of Horsham being the main Town. Network Rail also note that the status of Southwater, Billingshurst and Kilnwood Vale may need to be reviewed at future Local Plans due to the proposed developments which will see each of them significantly expand.

### **Support – Strategic Policy 2**

#### **Number of Comments**

17

#### **Summary of Comments**

##### Members of the Public and community groups

Rudgwick Preservation Society were in agreement with the Policy, and Warnham Park supported the categorisation of Warnham as a 'Medium Village'.

Other comments indicated support and advised that priority must be to develop brownfield sites rather than encroaching on the decreasing number of green fields.

##### Developers and Agents

It was common for site promoters to support the categorisation of the settlement to which they had interest. Other comments included:

- Agreement that Horsham is the most sustainable settlement within the District and placing of Southwater in the hierarchy.
- Agreed with development being directed towards various settlements throughout the District to meet growth objectives.
- Support for introduction of new categorisation of 'Secondary Settlements' to deliver appropriate sites for housing in suitable locations.
- Support a settlement hierarchy which ensures a consistent approach (- notwithstanding some concern on the overreliance of large strategic sites).

## Strategic Policy 3: Settlement Expansion

<b>Object – Policy 3</b>	
<b>Number of Comments</b>	<b>41</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Horsham District Scouts did not believe that the policy was specific enough in respect of facilities for young people and requested strengthened wording to facilitate this. Others sought additional Criteria to specifically prevent the coalescence of settlements.	
Another comment felt that para 4.36 contradicted Strategic Policy 2: Development Hierarchy and the principle that development outside of a defined BUAB will be more strictly controlled.	
<u>Developers and Agents</u>	
Comments received were numerous and included:	
<ul style="list-style-type: none"><li>- Lacks cohesion and is not effective – due to lack of consistency with the NPPF or considered that the supporting text was contradictory.</li><li>- Conflicts with SP2 – policy should make direct reference to relevance and application of SP2.</li><li>- Not all development outside of settlement boundaries will be unsustainable - more flexible approach should be adopted to deliver housing, which allows sites to come forward in appropriate edge of settlement locations, in accordance with the development hierarchy, not just within allocations.</li><li>- Policy should identify where settlements can provide further growth, with a range of size and type (reserve sites), including minimum housing figures for local areas irrespective of whether they intend to produce a Neighbourhood Plan.</li></ul>	
Specific comments on individual clauses were made and numerous amendments were suggested, including:	
<ul style="list-style-type: none"><li>- Various amendments were proposed to Criterion 1 to enable a greater variety / number / circumstances where housing would be considered acceptable:<ul style="list-style-type: none"><li>• Amendment to windfall development and set out the circumstances where development outside of an existing settlement will be considered.</li><li>• enable development close to the existing settlement edge (not just directly adjoining).</li><li>• Enable development to come forward if there is no specific allocation, if monitoring identifies a shortfall and there is sufficient water offsetting and the site adjoins the settlement edge.</li></ul></li><li>- Criterion 1 precludes affordable-led residential development on part-brownfield land that can demonstrate water neutrality. Policy is not positively prepared.</li><li>- Policy 3 highlights flaw in the overall strategy by focussing growth on a few locations and ignoring the growth of smaller settlements, despite acknowledging the contribution sites outside of settlement boundaries can deliver.</li><li>- Objections were received to criterion 5 and the use of the word ‘defensible boundary’ Some suggested this could come through a masterplan or development proposal, others suggested the use of ‘justified’ boundaries. Others considered this could be set out in the development principles policy. It was also queried if the phrase conflicts with allocations.</li><li>- Criterion 6 is unnecessary duplication of policy requirements.</li></ul>	
Another comment was made that the wording of the policy should be updated to make it clear that newly formed boundaries would also be accepted.	

#### Statutory Consultees

National Highways stated that the policy should actively identify the ability of additional settlement expansion proposals to facilitate reductions in the need to travel and the enhancement of active and sustainable modes of travel, including for those residents in adjoining existing areas, as a necessary criterion for relevant proposals to be supported under this policy.

Natural England broadly supported the policy but suggested that an additional criterion should be included to ensure that developments conserve and enhance the natural environment.

#### **Support – Policy 3**

<b>Number of Comments</b>	<b>3</b>
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#### **Summary of Comments**

##### Developers and Agents

Comments were made indicating support. Support was given as the policy recognises the need for development to be located across the District as a whole.

## Strategic Policy 4: Horsham Town

#### **Object – Strategic Policy 4**

<b>Number of Comments</b>	<b>3</b>
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#### **Summary of Comments**

##### Members of the Public and community groups

Horsham District Scouts objected to the policy on the grounds that it concentrates community services and facilities in the Town centre to the detriment of the new housing developments.

##### Parish Council

North Horsham Parish Council objected on the grounds that the policy is too Horsham town centre focussed and needed to give consideration to the needs of the north of the Town.

##### Developers and Agents

A representation was submitted objecting to policy because it restricted development to within built-up area boundaries (BUAB's). The representation suggested that the plan be amended to allocate a sustainable extension of Horsham Town to deliver circa 120 dwellings.

#### **Observation – Strategic Policy 4**

<b>Number of Comments</b>	<b>1</b>
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#### **Summary of Comments**

##### Developers and Agents

It was observed that additional development at Mowbray would align with the development hierarchy of the emerging Local Plan, providing a sustainable location for further growth and strengthening the role of Horsham town as the primary centre in the area.

<b>Support – Strategic Policy 4</b>	
<b>Number of Comments</b>	<b>2</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Forest Neighbourhood Council supported the policy as it aims to support Horsham’s role as the primary economic and cultural centre in the District.	
<u>Statutory Consultees</u>	
Network Rail supported the policy due to its promotion of high-quality transport infrastructure but requested additional reference to the scope for further improvements to Horsham station.	

## Strategic Policy 5: Broadbridge Heath Quadrant

<b>Objection – Strategic Policy 5</b>	
<b>Number of Comments</b>	<b>6</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
The Rudgwick Preservation Society highlighted the need to preserve the gap between Rudgwick and Broadbridge Heath, and to consider and mitigation the potential for increased flood risk downstream which may result from further development. The representation also suggests the policy should explicitly mention resilience to climate change and flooding.	
The Horsham Society raised concerns about the impact of the Policy on the primacy of Horsham town centre, in conflict with Policy 35. They also stated the policy threshold for a retail impact assessment should be reduced to 500sqm.	
<u>Parish Council</u>	
Denne Neighbourhood Council objected to the policy on the basis that:	
<ul style="list-style-type: none"> <li>- Adjoining parish councils should be consulted given the interaction the development will have with communities outside Broadbridge Heath Parish</li> <li>- The policy does not mention climate change mitigation or the role that landscaping and green space could play in linking the site to the wider countryside</li> <li>- The threshold of 1000sqm conflicts with the 500sqm threshold set for in-town development in Policy 35, and would undermine the town centre. Horsham Blueprint Neighbourhood Forum made similar points.</li> </ul>	
<u>Statutory Consultees</u>	
Natural England consider the policy wording relating to conserving and enhancing the natural environment, and contribution to the green infrastructure network, should be strengthened.	
Crawley Borough Council requested that impact testing on Crawley Town Centre should also be taken into account when applying criterion 5.	



<b>Observation – Strategic Policy 5</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Parish Council</u>	
Broadbridge Heath Parish Council thought that any development taking place in the Broadbridge Heath quadrant must strictly meet the requirements of the draft Plan.	

No comments were recorded in support of the policy.

## Strategic Policy 6: Climate Change

<b>Object - Strategic Policy 6</b>	
<b>Number of Comments</b>	<b>22</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
The Horsham Society recommended para 2.d be expanded to include a requirement on developers to produce a robust, effective and funded maintenance plan for green walls and roofs, tree planting or other nature-based solutions and landscaping, covering at least ten years.	
CPRE were of the view that all new-build houses should be fitted with roof and/or wall mounted solar voltaic panels.	
Other comments received included:	
<ul style="list-style-type: none"> <li>- Policy 6 refers to sustainable transport so why is “private car” being used in other parts of the Local Plan?</li> <li>- Incorporate avoidance of needless demolition into policy 6 to comply with government reports.</li> </ul>	
<u>Parish Councils</u>	
Ashington Parish Council commented that they consider the criteria of the policy to be admirable and desirable regarding net zero carbon emissions. However, due to the complexity of new technology, the cost to the developer and planning analysis required, this wording conflicts with that of SP1.	
West Chiltington Parish Council felt that the policy would be strengthened by requiring sustainability statements on all applications.	
<u>Developers and Agents</u>	
A number of site promoters were of the view that the policy was unclear and instead should be omitted and reliance placed on the Building Regulations and Future Homes Standards.	
Another comment suggested the wording should be changed to add that, <u>where possible</u> new buildings should be orientated to maximise the opportunities. Another commented that setting a percentage reduction beyond building regulations across a site would provide clarity.	

<b>Support - Strategic Policy 6</b>	
<b>Number of Comments</b>	<b>9</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Rudgwick Preservation Society commented that development should meet all clauses of the policy.	
The Woodland Trust welcomed the inclusion of nature-based solutions, including tree planting, in points 2c and 2d. They noted that wording that had been strengthened since the Regulation 18 consultation.	
<u>Parish Council</u>	
North Horsham Parish Council indicated support for clause 1e, the importance of sustainable transport infrastructure and encouragement of walking, cycling, etc.	
<u>Developers and Agents</u>	
Support was provided from some site promoters.	
<u>Statutory Consultees</u>	
The Environment Agency were generally supportive of this policy.	

## Strategic Policy 7: Appropriate Energy Use

<b>Object - Strategic Policy 7</b>	
<b>Number of Comments</b>	<b>23</b>
<b>Summary of Comments</b>	
<u>Parish Council</u>	
North Horsham Parish Council stated concern that restrictions on gas boiler installation is effectively in place immediately.	
Shermanbury Parish Council requested that wind farm energy schemes should be mentioned, including appropriate locations which will minimise the impact on residents. In addition, they stated that lithium-ion sites are of particular concern due to safety issues and that reference to this must be included.	
<u>Developers and Agents</u>	
A number of site promoters were of the view that the policy was cumbersome and overly prescriptive. Some suggested elements of the policy was unclear or that it was not clear how applicants would be expected to demonstrate meeting requirements. A number were also of the view that standards should not be set over and above building regulations. Other comments included:	
<ul style="list-style-type: none"> <li>- The introduction of a hierarchy of Zero and Low Carbon heating is inappropriate and could impact the viability of schemes</li> <li>- The requirement for an energy statement as an inclusion within the Local Plan is unnecessary.</li> <li>- It is inappropriate for specific technologies to be referenced as they continue to involve and/or the aim is to reduce emissions rather than how they are reduced.</li> <li>- Unreasonable to expect renewable energy generation on site.</li> </ul>	

Another comment was made that setting a percentage reduction beyond building regulations across a site would be clearer. It was also suggested that HDC should consider net zero carbon ready / future homes standard on at least strategic sites / significant site or target a 50% reduction across the site.

**Support - Strategic Policy 7**

<b>Number of Comments</b>	<b>4</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> Rudwick Preservation Society endorsed the aims and objectives wholeheartedly.	
<u>Developers and Agents</u> Support was provided from some site promoters.	

**Strategic Policy 8: Sustainable Design and Construction**

<b>Object - Strategic Policy 8 Sustainable design and construction</b>	
<b>Number of Comments</b>	<b>18</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> Horsham Society & Horsham Blueprint Neighbourhood Forum considered that the final clause of Paragraph 1.b "unless it can be demonstrated that this would make the scheme unviable" is unsound as it fatally undermines the policy. They were of the view that no unsustainable development should be considered acceptable.	
<u>Developers and Agents</u> A number of comments were made from site promoters. It was common for views to be expressed that it was not for the planning system to impose requirements beyond that contained within the building regulations – with some referring to the Written Ministerial Statement of 13 <sup>th</sup> December 2023. Others commented that more flexibility would be necessary or felt that provisions should not apply to sites that already benefited from outline planning permission. Another comment was made that was of the view that a fabric first approach should not be required.	

<b>Observation - Strategic Policy 8</b>	
<b>Number of Comments</b>	<b>4</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> Comments were made that:	
<ul style="list-style-type: none"> <li>- homes must be fitted with air-to-air heat pumps to address noise and air pollution.</li> <li>- It was unclear how HDC can influence homeowners to go to the expense of reducing carbon emissions</li> <li>- Will require power network upgrade to cope with peak demand especially the new developments and additional electric vehicle demand which is already nearing maximum capacity in parts of the local power network.</li> </ul>	

<b>Support - Strategic Policy 8</b>	
<b>Number of Comments</b>	<b>5</b>
<b>Summary of Comments</b>	
<p><u>Members of the Public and community groups</u>  Horsham Society supported the intent of the policy and Rudgwick Preservation Society endorsed the aims and objectives.</p>	
<p><u>Developers and Agents</u>  A few site promoters indicated support for the policy and were of the view that their proposed development would conform to such requirements.</p>	
<p><u>Statutory Consultees</u>  Surrey County Council indicated support for point 1b of the policy.</p>	

## Strategic Policy 9: Water Neutrality

<b>Object – Strategic Policy 9</b>	
<b>Number of Comments</b>	<b>137</b>
<b>Summary of Comments</b>	
<p><u>Members of Parliament</u>  Jeremy Quin, former MP for Horsham, considered the overall housing target was unsustainable given the water neutrality issue and the need to meet the Habitats Regulations. Among the points put forward were:</p> <ul style="list-style-type: none"> <li>- The Sussex North Water Resource Zone is the most over stressed zone in the country;</li> <li>- There appears to be no attempt to monitor or enforce with regards to water neutrality;</li> <li>- New households should be assisted to use less water but the targets in the policy are aspirational and can only be achieved through investment and behavioural change, which will take time to occur</li> <li>- The policy expectations will not be achieved so biodiversity will continue to be under threat;</li> <li>- The 85l/p/d target is not based on actual usage data and is stricter than building regulations;</li> <li>- The trial at CBC properties saw usage reduce by 23% but they were still using more water than 85l/p/d;</li> <li>- The measures at the CBC trial have been removed;</li> <li>- The Strategy is reliant on actions being taken by Southern Water (infrastructure, leak reduction);</li> <li>- HDC as an authority is not equipped to deal with the challenge and</li> <li>- HDC will need a process in place to hold developers to account.</li> </ul>	
<p><u>Members of the Public and community groups</u>  Save Rural Southwater and the Stammerham Amenity Association (SRS and SAA) submitted a representation. In relation to this policy, they were of the view that the work done by the partner bodies (including HDC) did not satisfy legal requirements, was incomplete and that further work would be needed before the issue could be addressed in the Local Plan. Points included:</p> <ul style="list-style-type: none"> <li>- Development can only provide 85l/p/d target as expressed in the policy theoretically (ie consumer behaviour may be above this in practice);</li> </ul>	

- Data shows that usage in existing properties is much higher and behavioural change would be needed which cannot realistically be enforced. As such, higher water consumption figures, reflecting actual use, should have been used in the evidence work;
- NE has abdicated responsibility of ensuring water neutrality in development to Councils and that HDC had accepted unrealistic assumptions in relation to planning applications and was not challenging the development industry;
- The LPAs can't/won't monitor or enforce water use thereby minimising the impact of the policy and not achieving stated goals;
- Development will never actually be water neutral and breach the Habitat Regulations;
- The Councils should study water use in new developments and use that data to inform further work, be more rigorous in scrutinising applications, introduce monitoring and enforcement.

In relation to specific wording of the policy/supportive text, comments expressed included:

- That requiring adherence to BREEAM standards is ineffective as the related calculator is hypothetical rather than a measure of actual use.
- That clause 2 b) will be ineffective if theoretical water use figures are used rather benchmarked data from actual use from existing built developments.

Many representations made the same or similar points as the SRS and SAA response, with a large number resubmitting the same response. In particular, it was common for responses to state that the policy was overly optimistic/unrealistic about water efficiency when water use in the WRZ/new developments was higher. In addition, a number of representations mentioned that account had not been had to the impact of the CG Fry case, which means more development would need to demonstrate water neutrality. Many also pointed that Southern Water were failing against their goals and/or unlikely to meet future targets. Some comments offered the view that the need to demonstrate water neutrality meant that a particular allocation could not come forward (this is discussed in individual site summaries). Other points made included:

- The Council's evidence base had not been updated to reflect up to date information;
- The Council's evidence base was not transparent in showing which sites/developments would use water by which year;
- The Council's evidence base double counts the work Southern Water are undertaking
- There are uncertainties with regard to other water sources;
- New water infrastructure is needed before new development can be permitted
- New build properties have higher occupancy rates, so will use more water than predicted;
- Occupancy rates will be higher in affordable housing, which has not been accounted for;
- It is impossible/impractical for the Council to enforce against properties utilising more water than predicted;
- Development recently approved will use/has used more water than originally assessed;
- Account has not been made for use of water for recreational use (e.g. hot tubs and paddling pools) nor has it been made for visitors (e.g. guests, etc.);
- The issue wasn't considered at the Regulation 18 stage and therefore should have not gone to Regulation 19 without another Regulation 18 consultation given the importance of the issue;
- Water restrictors or other devices would/could be removed by homeowners
- The water supply is vulnerable irrespective of the water neutrality issue and cannot accommodate the amount of development planned ;
- Climate change will further reduce the availability of water;
- It was not clear how water neutrality will be maintained through the lifetime of a development;
- The approach the Council was taking was not precautionary enough given the scientific uncertainty in relation to the issue;

- As more loss is incurred when transferring water further away from its source, the Council should have considered this when prioritising sites for allocation.

With regards to specific changes to the policy, the following amendments were suggested:

- 'Any application submitted in accordance with this Plan must include a plan to demonstrate how water neutrality will be achieved in respect to their application and how, during the life of the Plan, effective their plan has been in achieving water neutral.' This was suggested in order to make HDC responsible for ensuring that water neutrality measures are effective.
- Adding a policy/clause that in the event housing provision can increase over the plan period, priority is given to sites close to the water source.

#### Developers and Agents

A common concern made was whether SNOWS would be able to provide capacity to offset all planned development and/or when the capacity would be available, while others commented that the approach would impact on development proposals (including sites that they were promoting). Some felt that water neutrality was not a constraint that should limit housing targets to the extent identified in the Plan/at all as some sites not chosen to be allocated could come forward without being reliant on SNOWS. Some felt that the Part C Report showed headroom for further development, while others indicated that headroom would be created by way of some schemes using bespoke approaches to enable other development to come forward. It was mentioned by some that the policy should be clear as to what circumstance would trigger a review of the policy and/or housing targets.

Comments were made expressing that the Council and its partners should not be following the advice from Natural England provided in their Position Statement. Some referred to ongoing legal activities challenging the position statement and/or the Councils' approach. Many felt that it was Southern Water's responsibility, together with the regulatory agencies (Environment Agency and Natural England), through the Water Resource Management Plan (WRMP) process and/or the provisions under the Water Industry Act to address the issue rather than the Local Plan and/or individual planning applications. Some mentioned that there were options available now for Southern Water to take to ensure no harm to the Arun Valley (such as the cessation of groundwater abstraction at Hardham) and/or such options would soon be taken when the WRMP is finalised in 2025 or when studies at Arun Valley being undertaken are completed.

It was mentioned that SNOWS was not yet in operation and therefore there is uncertainty upon which to base a Local Plan - delays to the introduction of SNOWS, with some highlighting that the Joint Topic Paper anticipated it coming online in late 2023. Concerns were also expressed as to whether the capacity generated by SNOWS would go to development in other authorities where the need to demonstrate water neutrality was present.

It was common for those promoting strategic sites to suggest that they could demonstrate water neutrality as part of their development proposals. Some smaller omitted sites made similar claims. Different solutions and technologies were suggested as to how this could be achieved.

Another common concern expressed related to financial and/or other burdens that would be felt by the development industry that should fall on the water company (Southern Water), some felt that it wasn't accurately accounted for in the viability work – with some methods to achieving the target of 85lpd greater than £2,000.

Some aired concerns that the 85 l/p/d requirement was too onerous and others felt that development could be achieved with a higher requirement if SNOWS was not being utilised. Some expressed that it was not possible/desirable to go beyond national policy. It was

expressed that the guidance on how to complete a water neutrality statement is not yet in place.

Some suggested the complete removal of the policy on soundness (particularly as to whether the policy was effective or justified) grounds relating to issues captured above. Some advanced the view that water efficiency targets should start at 110 or 100 l/p/d with the ambition to become stricter over time as technologies improve. With regards to specific changes to the policy and supporting text, the following amendments were suggested:

- In paragraph 5.33 to replace 'and' with 'and/or' to reflect that it was not necessarily the case that grey water recycling and rainwater harvesting would both be needed.
- In clause 3, to make specific reference to prioritising strategic allocations for SNOWS as the delivery of such sites are crucial to the strategy of the plan as such sites have greater lead-in times/costs related to development.
- In clause 4 to remove the line 'any such development proposed will need to have regard to the local authority led offsetting scheme and associated documents' as it was unnecessary and ambiguous because if a planning application is submitted and not reliant on SNOWS it was queried why would such a scheme would need to have regard to SNOWS.
- In clause 6, to add to the first sentence 'in case of an emergency', to allow water to be supplied to development when there is a technical failure of bespoke solutions.
- In clause 6 to amend the policy to read 'Where an alternative water supply is to be provided, the water neutrality statement will need to demonstrate the reduction in demand on that no water is utilised from sources that supply the Sussex North WRZ. If a residual demand on the sources that supply the Sussex North WRZ is still required (for example, for blending groundwater to achieve drinking water standards) the water neutrality statement will need to clearly state how this will be offset or mitigated. The wider acceptability and certainty of delivery for alternative water supplies will be considered on a case-by-case basis.' To allow for water to be supplied to sites using different technologies which may be insufficient (e.g. during dry summers).
- In clause 7, to add after the word 'required' that 'points 1 to 6 of this policy shall cease to have effect' to make clear that should the need for water neutrality fall away, the other clauses would be unnecessary.

#### Parish Councils/Neighbourhood Planning Group

Ashington Parish Council stated that 85lpd appears to be a wholly unrealistic target and a more realistic and achievable figure should be set out. In addition, the parish made an observation on paragraph's 5.34 and 5.38. The wording appears to describe a ludicrous situation whereby the Council is allocated additional housing numbers to accommodate the unmet need of Crawley, then Horsham will look to offset water usage potentially against another district or county.

Broadbridge Heath Parish Council state scepticism that water neutrality has been adequately addressed to ensure appropriate mitigation against increased water usage. The parish are concerned that although mitigations may be demonstrated on paper, in practice they will not yield the necessary savings and efficiencies on water usage. Additionally, it is not made clear in the Plan as to whether each year's total savings from retrofitting aerated taps, showers, flow reducing valves etc will only be counted in the year of installation, or as a cumulative total (bearing in mind that there is nothing to stop householders removing them).

Itchingfield Parish Council felt that it was unfeasible that enough existing properties would be retrofitted with water saving devices and therefore water neutrality could not be achieved with the level of development proposed. They also expressed concern with the enforceability.

Rusper Parish Council thought that the approach to water neutrality was not compliant with the Habitats Regulations, contained flaws and omitted oversight systems. They were of the view that

the approach was not robust as it used over ambitious or unrealistic assumptions that could not be achieved. They pointed to a High Court Case (known as CG Fry) and that this was not anticipated in evidence base work, meaning that more development would need to demonstrate water neutrality.

In terms of water usage, they believed that while the policy's target was worthy it was over ambitious and noted Southern Water's target of 100 lpd for 2040. In respect of offsetting, they felt that the deliverability from SNOWS was imprecise and uncertain and that there was double counting with measures being taken by Southern Water. They also noted that the approach to water neutrality was strongly reliant on leakage reduction by Southern Water, who are not achieving targets and that improvements to supplies have long time frames and therefore uncertain. Given the uncertainty, they were of the view that the approach to water neutrality is vulnerable to non-achievement and that there should be more attention given to controlling and sanctioning performance rather than committing to high development levels.

With regards to oversight, they expressed that actual water usage of development should be measured, that there should be consumption limits in place for each phase of new development, there should be controls to hold developers to account and sanctions for exceeding performance expectations.

North Horsham Parish Council felt that though the policy was laudable if would be difficult to achieve and impossible to monitor. They also queried as to whether Arun District was in the WRZ and what the current water usage was.

The Horsham Blueprint Neighbourhood Forum stated that though they supported the aims of the policy but were sceptical of the assumptions used on water use – thinking that families with young children and people requiring home care would likely use more water. They also expressed concerns about whether SNOWS will be effective, measurable and robust at scale.

Shermanbury Parish Council believe that 85lpd is both unrealistic and unenforceable which will result in severe water shortages across the District in the future. The Plan does not appear to include any details in terms of monitoring water usage to enable the Council to challenge the effectiveness of developer's solutions.

Southwater Parish Council pointed out the difference between the development assumptions for Horsham District as identified in the Part C study (12,800 homes by 2038/39) rather than the 13,212 homes identified in the Local Plan as coming forward by 2040.

West Grinstead Parish Council had soundness concerns relating to the monitoring of water use in new development which they recognised as important from their review of the evidence base. Specifically, they wanted to know what monitoring would be put in place and how would monitoring work when SNOWS was not utilised. They also queried how HDC would challenge the effectiveness of developer's solutions and mentioned that water saving devices could be removed.

Storrington and Sullington Parish Council were of the view that proposed allocations in Storrington did not comply with the proposed policy as there was no evidence that borehole abstraction would provide a sustainable water supply and may threaten rare habitats.

West Chiltington Parish Council felt that the issue of water stress is not adequately addressed and questioned whether the policy requirements were realistic, and that they could be applied and enforced. They felt that a far more robust approach was needed and that at the moment, the Council was paying lip-service to the issue.



## Support – Strategic Policy 9

Number of Comments

13

### Summary of Comments

#### Members of the Public and Community Groups

A few comments indicated support for the policy or endorsed the aims and objectives of the policy.

#### Developers and Agents

A comment was received supporting the establishment of an authority-led offsetting scheme and that this was critical to support the delivery of housing.

Though critical of Natural England's stance, Southern Water's actions and referring to ongoing litigation, another developer indicated that they were generally supportive of elements of the plan – including clause 4 of the policy, as it confirms that development are not required to use SNOWS. They indicated general support for clause 1 of the policy but suggested that the first clause is amended to read – “Subject to further evidence or alternative mitigation measures being secured, all development within the Sussex North Water Resources Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. This is achieved by ensuring that:”. They were of the view that such the addition of flexibility would allow other clauses to fall away should the need to demonstrate water neutrality no longer exist.

#### Statutory Consultees

Southern Water supported the approach, noting that it was consistent with that of other Plans and reflected background studies. Despite this they recommended changes to the supporting text paragraph 5.31 to note that the WRZ is partly supplied from groundwater abstraction and that the words “on the River Arun” is removed.

Chichester District Council supported the policy noting that it reflected joint working on the matter with partners, including themselves and the Environment Agency also indicated support for the policy.

South Downs National Park Authority supported the policy and that it reflected ongoing joint work. They identified however that they weren't a local authority but a partner in SNOWS.

Crawley Borough Council indicated strong support for the policy approach, recognising that it reflected joint work across boundaries. They suggested that amendments were made to clause 7 of the policy to explain that high water efficiency standards for non-residential development will still be required should the need for water neutrality fall away. They also advised that it would be helpful to clarify what would happen in the Bramber/Upper Beeding area should the water neutrality requirement fall away.

Natural England indicated strong support for the policy and was sound. They were of the view that the policy requirements were sufficient to rule out adverse effect on the integrity of the protected sites that result from abstraction at Pulborough.

# Strategic Policy 10: Flooding

<b>Object - Strategic Policy 10</b>	
<b>Number of Comments</b>	<b>12</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> Comments made relating to this policy included: <ul style="list-style-type: none"><li>- A policy criteria should be introduced that no development should be within 5m of a watercourse</li><li>- Flood water should be directing into reservoirs to save it for times of serious water shortage.</li><li>- The area is already seriously water stressed and every effort should be made to build a new reservoir (or even reservoirs) to conserve water for times of drought.</li><li>- The site at East of Billingshurst should be rejected as an allocation due to flooding issues.</li></ul>	
<u>Parish Councils</u> Ashington Parish Council asked for confirmation of the status of any new developments, and details of who will be responsible for the upkeep and repair of roads in future years, given that WSCC Highways will often not adopt roads with SuDS.  North Horsham Parish Council were of the view that better management and more robust intervention by water companies together with responsibilities undertaken by those with riparian rights were needed. They also suggested that the area north of Horsham has historically been a floodplain and continues to flood.  Storrington and Sullington Parish Council commented that little information had been providing water run-off and that that the development of allocation STO1 will increase flooding around East Wantley and be impacted itself by flooding.  Upper Beeding Parish Council noted the increase of water runoff into the Adur, caused by development in Horsham District and elsewhere, resulting in high water levels through the parish and incidents of flooding, causing roads to be shut. They expressed concern about further flooding caused by large scale development and also felt that there were issues around sewage of foul water infrastructure that required addressing.	
<u>Developers and Agents</u> A comment was received questioning the soundness of the plan in relation to the absence of an updated SFRA and sequential test when alternative sites are promoted.  Another comment was of the view that the Sustainable Urban Drainage Systems (SuDS) requirements are non-specific. It was suggested that the CIRIA SuDS manual could be referenced.	
<u>Statutory Consultees</u> Environment Agency suggested that the policy should refer to both green and blue infrastructure.  Southern Water suggested an amendment to criterion 2i) to read: “Make appropriate provision for surface water drainage to ground, water courses or surface water sewer. Development will not be allowed to drain <u>surface water</u> to the foul sewer, <u>and new connections of surface water to the combined sewer will be resisted.</u> ”	

Thames Water suggested the following should be Suggest the following paragraphs should be included in Policy wording or supporting text:

- “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”
- “surface water drainage system discharge rates should be restricted to the equivalent Greenfield Qbar runoff rate or as close as practically possible, but never greater than 2 litres per second per hectare (2l/s/Ha), in line with CIRIA guidance.”

### Support - Strategic Policy 10

<b>Number of Comments</b>	<b>5</b>
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#### Summary of Comments

##### Members of the public and community groups

Comments made supporting the policy, included:

- paragraph 3 of this policy recognises the role played by natural flood management and ecology
- this will strengthen policy for use of nature-based solutions in drainage and flood management.

##### Developers and Agents

A comment was made supporting the policy and explaining that their proposal was compliant with it.

##### Statutory Consultees

Natural England were supportive of part 3 of the policy to maximise the amenity, green infrastructure and biodiversity value of SuDS.

## Strategic Policy 11: Environmental Protection

### Object – Strategic Policy 11

<b>Number of Comments</b>	<b>7</b>
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#### Summary of Comments

##### Members of the Public and community groups

Campaign to Protect Rural England (Sussex Branch) stated that criterion 3 should be strengthened to address the issue of stormwater outflows and river pollution through timely provision of waste water infrastructure.

Members of the public made the following representations:

- Para 6.1 – Questioned why any more development is allocated at Storrington or Cowfold with their AQMAs, any additional housing will increase the level of pollution.
- Para 6.2 – There is poor water quality, especially after rainfall due to effluent releases. HDC need to have far more evidence that Southern Water will improve the water quality before any new housing is allowed.
- Para 6.3 – There is no mention of wood burning stoves which are now a significant part of air borne pollution. HDC should seek to remind residents that this is the most polluting form of heating.

### Parish Council

Ashington Parish Council commented on the wording of paragraph's 6.1 and 6.7 regarding air pollution. They did not view it as clear as to how the Local Plan will address and mitigate the effects of the additional housing proposed for Ashington, Steyning, Storrington and Sullington, Thakeham and West Chiltington.

Cowfold Parish Council stated that the Local Plan fails to take reasonable consideration of the traffic and air quality implications in the wider District, specifically the Cowfold AQMA. They were of the view that the policy needs to be amended to include mitigation or show how any development would not be any increase in traffic through Cowfold AQMA as a result of the development. They further explained that mitigation of both private vehicles and any delivery vehicles would be needed.

West Chiltington Parish Council thought that the criteria in relating to minimising light impacts needs to be a requirement for all applications and commented that external lighting in a new and existing property in a Dark Skies area can have significant impacts.

### Statutory Consultees

Natural England state that they broadly support Strategic Policy 11, but consider that the wording should be strengthened to be more closely aligned with NPPF requirements of conserving and enhancing the natural environment and offered the following amendments:

“The high quality of the District’s environment will be protected and enhanced through the planning process and the provision of local guidance documents.....

3. Maintain ~~or~~ and improve the environmental quality of any watercourses, groundwater and drinking water supplies, .....
4. Ensure no adverse impacts result from ~~Minimise the impact of~~ lighting on neighbouring uses, the wider landscape and biodiversity, .....
6. ~~Minimise~~ Ensure no impacts result from air pollution and greenhouse gas emissions in order to protect human health and the natural environment.”

Thames Water made a representation against para 6.2, stating that they support reference to water and wastewater infrastructure, but that such an important issue should be covered in a separate policy and suggested detailed policy wording to address this.

South Downs National Park Authority stated that criterion 4 should be strengthened and amended to read: “Avoid and M~~inimise~~ the impact of lighting on neighbouring uses, the wider landscape and biodiversity, including potential glare and spillage, and avoid adverse impacts on and protect the integrity of ~~particularly with regard to~~ the South Downs International Dark Sky Reserve designation. ....”

## **Observation – Strategic Policy 11**

**Number of Comments**

**3**

### **Summary of Comments**

#### Members of the Public and community groups

A comment was made questioning how paragraph 6.7 could be achieved should development be progressed that impacts upon existing AQMA's without effective mitigation.

Another commented about the impact of development on the rivers, aquatic and oceanic life that is interlinked with our beings and economy. They explained that decisions made today have legacies for years beyond the lifespan of the plan and asked how can development be agreed when abstraction is depleting the water levels and increasing surface run off and sewage?

<b>Support – Strategic Policy 11</b>	
<b>Number of Comments</b>	<b>2</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Rudgwick Preservation Society endorsed the aims and objectives of the policy. They asked for attention to be given to the impact of traffic (A281) in Bucks Green on air quality and noise for residents of both existing and future housing, and its mitigation.	
<u>Statutory Consultees</u>	
The Environment Agency stated that they are pleased to see that their comments from the Regulation 18 consultation have been incorporated into the policy.	

## Strategic Policy 12: Air Quality

<b>Object – Strategic Policy 12</b>	
<b>Number of Comments</b>	<b>4</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
One comment was made that clause 3 - “Minimise traffic generation and congestion through access to sustainable transport modes, maximising the provision for cycling and pedestrian facilities.” - was impractical with the elderly demographic in the area. They were of the view that few residents feel safe and fit enough to cycle, pavements were of poor quality and narrow, and public transport is inadequate resulting in households to drive. They were of the view that there is no solution to address the air pollution.	
<u>Parish Council</u>	
Cowfold Parish Council wanted the policy to include details of mitigation or show how any development will be implemented in such a way that there will not be any increase in traffic through the Cowfold Air Quality Management Area (AQMA) as a result of development. They expanded by explaining that details of mitigation should reflect both private vehicles directly associated with the development, and delivery vehicles of all types.	
More generally, they felt that the Local Plan fails to take reasonable consideration of the traffic and air quality implications in the wider district area, and specifically Cowfold AQMA which was felt is already at capacity.	

<b>Support – Strategic Policy 12</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
The Woodland Trust welcome and support the strengthened policy, with improved wording in criterion 5, to protect sensitive habitats including ancient woodland. The final wording better reflects the requirements of NPPF para 186 c) for ancient woodland protection.	

# Strategic Policy 13: The Natural Environment and Landscape Character

<b>Object – Strategic Policy 13</b>	
<b>Number of Comments</b>	<b>7</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Sussex Wildlife Trust were supportive of the policy but sought additional text to further recognise the importance of Natural Flood Management alongside SuDS in bullet 4 of the policy.	
The CPRE felt the policy should be reinforced by including a number of additional points, including:	
<ul style="list-style-type: none"><li>- Development which reduces, blocks or harms the functions of green infrastructure should be avoided.</li><li>- The highest protection is to be given to the strategic green infrastructure network and development proposals should maximise opportunities to maintain and extend it, including links, and incorporate cross-boundary green infrastructure matters at an early stage.</li><li>- Large development should be required to provide new and/or create links to green infrastructure and consider the incorporation of blue infrastructure including SuDS.</li><li>- Natural England's Accessible Natural Green Space Standard recommendations and the Woodland Trust's Woodland Access Standard should be used.</li><li>- Applications should secure benefits for the purpose of pollination and biodiversity as part of their on-site landscaping schemes, including green roofs and green walls, where soft landscaping at ground level is limited.</li><li>- The policy should make clear the Local Nature Recovery Strategy is the West Sussex Nature Recovery Strategy and state when it is likely to be published (eg summer of 2025). It should also make clear the National Nature Recovery Network is not yet published.</li></ul>	
<u>Parish Council</u>	
Cowfold Parish Council, whilst supporting reference to Green Space, Nature and the Environment felt the Local Plan fails to reference or include the importance of connectivity, making the point that this is important for natural environment to thrive. As such, it was recommended that relevant policies (such as this) be amended to recognise the importance of wider connectivity between these green areas. They felt a good example is the Weald to Waves project and that including such reference in the Local Plan will ensure that no development can impinge on vital nature corridors.	
<u>Developers and Agents</u>	
A view was expressed that it was inappropriate and inconsistent with policies contained in the NPPF (Sept 2023), particularly para 180, for the general countryside/natural environment policies to provide blanket 'protection' to all land outside the defined settlement boundaries. Furthermore, they felt that it was inconsistent with the NPPF for the policies to 'protect against inappropriate development' in the countryside as the term solely applied to development within the Green Belt.	
<u>Statutory Consultees</u>	
Natural England indicated support for the policy wording but thought it should be strengthened to reflect the full suite of environmental assets within the District and ensures that development conserves and enhances the natural environment, in accordance with the National Planning Policy Framework (NPPF). Some detailed policy wording was suggested in this respect.	

<b>Observation – Strategic Policy 13</b>	
<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
A comment was made that prior to new development coming forward, Southern Water needs to be held to account and address and sort all issues re run off and sewage due to the impact on the natural environment – particularly watercourses and oceans.	
Rudgwick Preservation Society commented that Rudgwick is on the border of Waverley and Chichester and that it is vital to recognise the importance of protecting the Waverley Area of Great Landscape Value in Cox Green, and the ancient woodlands, similar to The Mens, in Loxwood, right on our border, and which are considered a local resource for public enjoyment and wildlife conservation. They also commented on the contradiction between countryside protection and mineral extraction.	
<u>Parish Council</u>	
Ashington Parish Council stated that there are fundamentally some positive, although, quite generic statements made. However, they queried how and whether these will translate into actions given the ongoing difficulties with previous and current developments.	

<b>Support – Strategic Policy 13</b>	
<b>Number of Comments</b>	<b>7</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
A comment was made supporting the recognition of the importance of farm diversification.	
Forest Neighbourhood Council indicated support for the policy, particularly clause 1.	
Sussex Wildlife Trust were supportive of this policy and its consistency with many elements of Chapter 15 of the NPPF (2023). (Suggested amendment covered in objection summary)	
National Farmers Union commented that infrastructure, as referenced in paragraph 6.17, is highly important to farming.	
<u>Parish Councils</u>	
West Chiltington Parish Council indicated support for the wording of 6.19 and the recognition of the issues identified.	
<u>Developers and Agents</u>	
Comments were made supporting the policy in principle and noted that their proposals would conform to the policy.	

## Strategic Policy 14: Countryside Protection

<b>Object – Strategic Policy 14</b>	
<b>Number of Comments</b>	<b>22</b>
<b>Summary of Comments</b>	

#### Members of the Public and community groups

National Farmers Union stated that there is limited reference to agriculture and food production. There is a diverse range of farms across the District that contribute to the local economy and landscape and it is highly important that we continue to have a rural farming community in Horsham and also help people businesses improve efficiencies.

A comment was made indicating that the policy wording is a good start but would be improved if the flexibility of acceptable proposals was increased to include small scale housing for those with local connections or self & custom build for those on the HDC Register. Clarification was also sought as to whether farms are classified as brownfield sites.

Another comment requested amendment to the wording of criterion d): to include any HDC approved 'green gaps'.

#### Parish Councils

Ashington Parish Council asked how and whether the statements made within the policy and supportive text will translate into actions given the ongoing difficulties with previous and current developments.

Cowfold Parish Council commented that the policy as drafted fails to reference or include the importance of connectivity of green spaces, nature and the environment.

Upper Beeding Parish Council felt that proposed development would be in breach of the policy by resulting in a loss of wildlife and biodiversity. They also felt that development had affected the rural nature of the district/region and that commuting had contributed to increased air pollution.

West Chiltington Parish Council felt the policy was 'woolly' and not transparent, and that adherence to policy would resolve local frustration about decisions. They felt that the policy would benefit from being explicit about what would be unacceptable.

#### Developers and Agents

A number of objections were received from the development industry. Common reasons included:

- Policy is too restrictive, preventing opportunities for suitably located sites to come forward. Increased flexibility needed.
- Not consistent with national policy, specifically NPPF para's 16, 180 and 181.
- Criterion and supportive text should be added to make reference to allocated sites within the Local Plan.
- Policy conflicts with Strategic Policy 3: Settlement Expansion. Add a new criterion (3) to state that the policy does not apply to sites coming forward in accordance with Policy 3.
- Policy conflicts with policy 32 and 42 of the Plan.

### **Support – Strategic Policy 14**

**Number of Comments**

5

#### **Summary of Comments**

##### Parish Council

Forest Neighbourhood Council indicated that it strongly supports this policy.

##### Developers and Agents



A comment of support to the policy was made, in particular relating to the inclusion of criterion b) as they were of the view that is necessary to ensure the Local Plan is consistent with the Joint Minerals Plan and is in conformity with the NPPF.

Another comment was made supporting farm diversification in paragraph 6.25.

## Strategic Policy 15: Settlement Coalescence

<b>Object – Strategic Policy 15</b>	
<b>Number of Comments</b>	<b>8</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Rudgwick Preservation Society stated that criterion 1 should be extended to include the refusal of development which comprises the small gaps in-between hamlets. Another suggested the criterion exclude green gaps.	
<u>Parish Council</u>	
Cowfold Parish Council requested that the policy is amended to recognise the importance of the wider connectivity between green areas, ensuring no development can impinge on vital nature corridors.	
<u>Developers and Agents</u>	
A view was expressed that the policy prevents the effective delivery of strategic sites and key infrastructure, and that strategic sites be specifically excluded in the policy wording. Another suggested that local plan allocations be excluded in the policy wording.	
Other comments included:	
<ul style="list-style-type: none"> <li>- The restriction of coalescence between settlements can be managed through other development management policies such as Policy 14: Countryside Protection.</li> <li>- Future urban extensions to the most sustainable settlements are likely to be prevented in the future if the policy is not flexible enough to allow for some new development.</li> <li>- Policy is flawed and ineffective as it would apply to all development, including all Local Plan allocations, outside of a BUAB regardless of whether the proposal would or would not give rise to coalescence.</li> <li>- The policy was contrary to NPPF.</li> </ul>	
Amendments to the policy were suggested, including:	
<ul style="list-style-type: none"> <li>- Referencing that the development does not give rise to actual or perceived settlement coalescence and use of the word significant is deleted.</li> <li>- Amending criterion 1.b. to read: “... and / or the significant widening of the roads between the settlements, and increased traffic movements.”</li> </ul>	

<b>Observation – Policy 15</b>	
<b>Number of Comments</b>	<b>36</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Save Rural Southwater and Stammerham Amenity Association were of the view that the West of Southwater allocation was inconsistent with this policy. A number of other comments were of the same view. A similar point was made in relation to the proposed allocation at West of Ifield.	

### Parish Councils

Storrington and Sullington Parish Council observed that proposed allocations STO1 and STO2 were contrary to the requirements of this policy.

West Chiltington Parish Council, whilst grateful of the recognition of the importance of separation between West Chiltington's village and The Common, expressed concern about coalescence with other settlements. They specifically referenced that a proposed allocation in Storrington (STO1: Melton Drive) would reduce separation and also noted that a live planning application on the Thakeham Mushrooms site could reduce the gap between Thakeham and the parish. They felt that the parish was in the process of being caught in a pincer movement.

### **Support – Policy 15**

#### **Number of Comments**

4

#### **Summary of Comments**

##### Parish Council

North Horsham Parish Council supported efforts to stop coalescence of communities, particularly between North Horsham and Faygate, and that there is also the need to avoid any further expansion north and east of the Mowbray site to stop coalescence and further erosion of the gap between the settlements. Despite this, they were of the view that the inclusion of allocations at Cuckmere Farm and Mercer Road appears to be at odds with the policy as this would narrow the gap between Warnham and Horsham.

Forest Neighbourhood Council were supportive of the policy, with particular relevance to allocation HA10 – HOR1.

##### Developers and Agents

A comment was received supporting the principle in seeking to prevent settlement coalescence generally.

##### Statutory Consultees

Crawley Borough Council supported the importance of ensuring against coalescence of Crawley and Horsham. They commented that any approved strategic development would clearly define the urban edge with fixed natural features and/or permanent rural/natural land uses.

## **Strategic Policy 16: Protected Landscapes**

### **Object – Strategic Policy 16**

#### **Number of Comments**

6

#### **Summary of Comments**

##### Members of the Public and Community Groups

The High Weald AONB unit suggested amendments to the policy wording to strengthen the policy. These include:

- For clause one, the paragraph should begin with "Development within the AONBs should be limited in scale and extent, and be landscape-led" to align with NPPF para 182.
- For clause one, the last sentence should be deleted since harm to the AONB should be avoided not compensated for.

- For clause 2, that the paragraph should be expanded to add “i.e. the conserving and enhancing of the AONB, and with the objectives of the High Weald AONB Management Plan.”
- For clause three, the paragraph should be reworded to align with NPPF para 183 to read “Major development within the AONB will only be permitted in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Applicants will be required to demonstrate what alternatives to the proposal have been considered.”

The AONB Unit also explained that AONBs are to be known as National Landscapes, though in policy, legislation and guidance the High Weald National Landscape remains an AONB. They suggested that an explanation is included in the supporting text.

Parish Council

While supporting the intent of the policy, Cowfold Parish Council felt that the policy should have referenced the importance of connectivity and nature corridors and that development could impinge on such corridors. They specifically mentioned the Weald to Waves project that seeks to achieve a corridor between Climbing and the Ashdown Forest, to highlight their point.

Developers and Agents

While a generally supportive comment was made, one site promoter felt that the references in the Plan to the AONB should be changed to refer to ‘national landscape’.

Statutory Consultees

The South Downs National Park Authority commented that the wording of the second and third sentences in paragraph 6.32 of the supporting text did not sufficiently reflect the requirement of NPPF para 182 that ‘development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas’ albeit proposed replacement wording was not provided. The SDNPA also felt that the paragraph did not accord with the legislative requirements to ‘seek to further the purposes’ of the National Park.

Though supportive of clause 4 of the policy, they requested that reference is made to the South Downs View Characterisation Study in both the policy and supporting text as it provides evidence and guidance. They also felt the second sentence of clause 4 should be reworded to ‘In particular, proposals should not cause harm to the special qualities (including dark skies), local distinctiveness or sense of place, or negatively affect views into and out of the National Park’ noting that while harm to views can be an important part of harm to local distinctiveness and sense of place, the latter can also be harmed by other changes.

<b>Observation – Strategic Policy 16</b>	
<b>Number of Comments</b>	2
<b>Summary of Comments</b>	
<u>Neighbourhood/Parish Council</u>	
Forest Neighbourhood Council commented that the policy was relevant to development in Horsham Town, including allocations.	
Storrington and Sullington Parish Council felt that the proposed allocation STO1 did not comply with Strategic Policy 16.	

<b>Support – Strategic Policy 16</b>	
<b>Number of Comments</b>	<b>5</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
The High Weald AONB unit provided general support for the policy, its references to the AONB and related documents, but suggested amendments to the policy wording to address concerns (see ‘Object’ summary).	
<u>Parish Council</u>	
Cowfold Parish Council supported the policy, but suggested amendments (see ‘Object’ summary).	
North Horsham Parish Council indicated strong support for the protection of the AONB, important habitats and enlargement of the BUAB and avoidance of coalescence.	
<u>Developers and Agents</u>	
While a supportive comment was made, one site promoter felt that the references in the Plan to the AONB should be changed to refer to ‘national landscape’.	
<u>Statutory Consultees</u>	
The South Downs National Park Authority supported clause 4 of the policy but recommended amendments to parts of the policy and supporting text (see ‘Object’ summary).	

## Strategic Policy 17: Green Infrastructure and Biodiversity

<b>Object – Strategic Policy 17</b>	
<b>Number of Comments</b>	<b>61</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
A number of comments thought the policy was weak, not detailed enough and insufficiently robust. A number of comments received viewed the policy as inconsistent with the levels of development proposed by the Local Plan as they were of the view that new development would cause loss of biodiversity rather than deliver net gain. Views were expressed that the Council did not have enough knowledge of the district’s GI assets and ecology, that it was too reliant on the LNRS and desktop assessments and that the Council’s GI Strategy was insufficient. Some questioned whether the Council are resourced to apply the policies. Other comments suggested that the policy failed to refer to existing GI assets – particularly those in the northern part of the district and beyond.	
In terms of amendments to the policy and supporting text, various suggestions were made, including:	
<ul style="list-style-type: none"> <li>- In paragraph 6.42 adding requirement for sufficient Swift bricks for one per property (on average)</li> <li>- The mitigation hierarchy should be reflected more clearly at an early stage of the supporting text and/or the policy. It should be clear it must be followed and that biodiversity net gain is an additional requirement and only applied after impacts have first been avoided.</li> <li>- In criterion 4, making clear that 10m is the minimum buffer zone from a watercourse and requiring timely provision of sewage infrastructure to prevent pollution incidents</li> </ul>	

- Insert as 5d) “site clearance has not occurred before a HDC arboricultural survey and ecology survey has been undertaken.”
- Insert in 10 reference to ‘Ancient woodland, ancient trees and veteran trees: advice for making planning decisions’ (Natural England and Forestry Commission Jan 2022), and that any veteran or ancient tree should be assessed by the qualified arboriculture expert and their recommendations adhered to.
- Amending criterion 11 to require replacement trees to be native and UK grown where possible, and to make clear that a greater than 1:1 replacement would be required to meet BNG requirements.

A number of comments were received in relation to ancient woodland. It was suggested that a list of recognised ancient forests in Horsham District should be an appendix to the Local Plan, though another comment received suggested that the existing data on ancient woodland was incomplete and the Council should work to update it around allocated sites.

Comments were also received suggesting that a 50m buffer from ancient woodland would be appropriate unless demonstrated that a different buffer would be sufficient as 15m is the statutory minimum, not the optimum.

A further comment viewed that providing offsetting away from the development and potentially outside of the district would mean that local people would not benefit from new development. Another comment enquired as to what ‘biosolar roofs’ were and that it be defined in the glossary.

In respect of Green Infrastructure (GI) and Local Nature Recovery Networks (LNRN), a number of reps made some or all of the following points:

- Development proposals which reduce, block or harm the functions of GI and/or LNRN should be refused.
- The GI and LNRN are afforded the highest protection from existing or potential threats.
- Development proposals should maximise the opportunity to maintain and extend GI links to form a multi-functional network of open space, providing opportunities for walking and cycling.
- Cross-boundary matters relating to GI and LNRN should be considered and addressed at the early stage of an application.
- Major development proposals will be required to provide new and/or create links to GI, and consider the use of SuDS and the incorporation of blue infrastructure into development designs to reduce surface water run-off and improve the visual amenity of the development.
- Natural England's Accessible Natural Green Space Standard recommendations and the Woodland Trust's Woodland Access Standard should be used to assess a proposed development's location in relation to existing accessible natural green space and woodland.
- The policy should require that “ecological appraisals should comply with Natural England’s Standing Advice: ‘Guidance Wild birds: advice for making planning decisions when there are wild birds on or near a proposed development site’.” as ecological appraisals submitted in support of applications are rarely informed by on-site four-seasons bird surveys and recording.
- The policy should make clear that applications should secure benefits for biodiversity as part of their on-site landscaping schemes, including green roofs and green walls, where soft landscaping at ground level is limited.

#### Developers and Agents

A large number of site promoters objected to the 12% BNG target. Reasons for this varied, but common reasons included:

- The figure is arbitrary and/or not clearly evidenced.
- The figure exceeds national requirements and should not do so.
- The target will affect viability of sites.
- The viability study justifying the approach is not based on reliable figures.
- The target may impact on the delivery of other policy aims, such as affordable housing.

A view was expressed that the 12% target should be phased in, so that existing sites (e.g. Neighbourhood Plan allocations) should not be affected by delays caused by water neutrality to the delivery of development. Another commented that the additional 2% target should only apply to greenfield sites.

A comment was received that the requirements in criterion 3 went beyond national requirements of BNG assessment and that the Council could not legally do this. Comments received on criterion 5c) questioned the principle of 'right habitat in the right place' as the BNG requirement made such a requirement onerous and unnecessary.

Numerous comments were received on criterion 6 and related supporting text. Many felt that it was not appropriate to restrict off-site net gain to the district, as this goes against national guidance and may not be possible to achieve and thus would restrict development from coming forward. Some felt that the criterion repeated elements of national policy (e.g. needing to be in place for 30 years) and/or criterion 5 of this policy. Some expressed that the mitigation hierarchy is not included in BS42020 and this reference should be removed. Given that net loss of biodiversity is not allowed given that gain is to be achieved, it was not clear why demonstration of no net loss was necessary to some that commented. A comment received expressed that the mandatory system does not require detailed material on exactly how BNG will be delivered at either the application or determination stage, instead it links it to a pre-commencement condition.

Additional comments on criterion 6 sought that the delivery of BNG on adjoining sites (to those being promoted for development) should be encouraged if it delivers equal or better biodiversity benefits, while another thought that land in control of the applicant elsewhere in the district for the provision of BNG should also be specifically allowed for within the policy.

A further specific comment was received relating to criterion 11 that the policy should reflect the specific circumstances around plantation woodland, which are of a lower quality and were planted with the intention of being felled in the future.

#### Parish Council

Cowfold Parish Council felt that the Local Plan does not refer or highlight the importance of connectivity/corridors between different GI assets and gave an example of the Weald to Waves project as doing this successfully.

West Chiltington Parish Council were of the view that the supporting text (para 6.42, second sentence) should read "Development does, however, have potential to create places for biodiversity which applicants are ~~expected~~ required to incorporate." as they felt that the existing wording was too weak. Similarly, they felt that the buffer around ancient woodland should be larger than the 15m suggested in paragraph 6.59 to ensure protection of such assets.

#### Statutory Consultees

Natural England strongly supported the policy but felt it could be further strengthened to ensure the Plan delivers environmental benefits. The following amendments were suggested:

- To provide specific reference to "the Sussex Bat SAC protocol",

- To link to the “provision for accessible natural green space (ANGS) and Green Infrastructure to improve housing standards for people, including improving and access to nature” and criteria 2, 6 and 8 amended to read as follows:
- Criterion 2: Include before the final sentence starting with “Development proposals...’ the following, “Opportunities to retrofit green infrastructure in existing settlements to meet the national Green Infrastructure Standards will be maximised.”
- Criterion 6 to be amended to read, “Relevant Development proposals will be expected to deliver 12% biodiversity net gain...”
- Criterion 8: should be amended to read, “Proposals must give appropriate consideration to protected, priority and notable species. They will be expected to protect populations of protected, priority and notable species and seek to aid their recovery, and must conserve, restore and enhance priority habitats, and should create and manage appropriate new habitats, taking into account pollination, where practicable.”

Environment Agency recommended that any references to ‘green infrastructure’ are modified to refer to ‘green and blue infrastructure’.

South Downs National Park Authority supported reference in the introductory text to the Sussex Bat Protocol, the 6.5km and 12km zones which are also shown on the policies map, and the important consideration for development in these zones. For clarity and to ensure a robust policy to address the Habitats Regulations they advised that these zones be incorporated into the policy wording itself.

### **Observation – Strategic Policy 17**

**Number of Comments**

**11**

#### **Summary of Comments**

##### Members of the Public and community groups

Comments were received including:

- Questioning whether the goals of paragraph 6.42 was a requirement or a request and whether there were measures to monitor the success of this ambition?
- Questioning whether Neighbourhood Plans will be required to be reviewed to ensure that the aims of paragraph 6.43 is met.
- There was no reference to the agriculture and food production within the policy.
- There is a need to protect green spaces from litter, raw sewage and other adverse impacts to wildlife and biodiversity
- The numbers of conservation volunteers will reduce as the retirement age increases and this will need to be overcome.

##### Developers and Agents

A comment was received that suggested that 12% BNG target is arbitrary but that their site would be able to meet it. Another comment received suggested that they were supportive of the principle of a higher than statutory target, further evidence was needed to justify the approach.

##### Parish Councils

Ashington Parish Council commented that there are fundamentally some positive, although quite generic, statements. They did, however, query how and whether these statements will translate into actions given the ongoing difficulties with previous and current developments.

Storrington and Sullington Parish Council felt that allocations within their parishes did not comply with Strategic Policy 17 because they seriously damage the green infrastructure and biodiversity to the north and east of Storrington.

Charlwood Parish Council felt that there was insufficient information and weight given to the value of the habitat in the Green fields earmarked for development. They expressed that Wildlife friendly policies must include uses such as hedgehog friendly fencing and wildlife corridors.

### **Support – Strategic Policy 17**

<b>Number of Comments</b>	<b>10</b>
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#### **Summary of Comments**

##### Members of the Public and community groups

Comments received included those that supported:

- the maintenance and enhancement of Green Infrastructure and the principle of biodiversity net gain.
- the principle of optimising access to open space and nature via active means of travel.
- the imposition of buffers around ancient woodland and trees
- efforts to reduce fragmentation of habitats
- the reference to the Knepp Estate in paragraph 6.45
- the commitment to protecting and restoring biodiversity
- going beyond the minimum national requirement for BNG
- reference to veteran trees.

##### Parish Council

North Horsham Parish Council strongly supported all elements of this policy, but highlighted criterion 10, regarding buffer zones around Ancient Woodland, as being of particular importance.

##### Statutory Consultees

Surrey County Council indicated support for the in-depth discussion on Biodiversity Net Gain (BNG) and the Local Nature Recovery Strategy (LNRS) as well as protected species and habitats.

## **Policy 18: Local Green Space**

### **Object – Policy 18**

<b>Number of Comments</b>	<b>3</b>
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#### **Summary of Comments**

##### Members of the Public and community groups

The Horsham Society and Horsham Blueprint Neighbourhood Forum both indicated support for the aims of the policy. However, they were of the view that for it to be sound, the policy should include additional wording to the effect that every opportunity should be taken by developers to incorporate new areas of public open space with a view to them being considered for incorporation within Neighbourhood Plans.

##### Statutory Consultees

Crawley Borough Council requested an additional criterion to be included:



“3. Strategic development should not adversely impact, and should enhance, any Local Green Space it is adjacent to”.

They identified that the Crawley Borough Local Plan 2023-2040 designates Ifield Brook Meadows and Rusper Road Playing Fields as a Local Green Space and were of the view that strategic development would significantly and negatively impact on this setting and the experience of the Local Green Space.

### Support – Policy 18

**Number of Comments** | 1

#### Summary of Comments

##### Parish Council

North Horsham Parish Council indicated support for the policy and asked that the policy encompasses all green spaces, including the small pockets within existing development.

## Strategic Policy 19: Development Quality

### Object – Strategic Policy 19

**Number of Comments** | 9

#### Summary of Comments

##### Members of the Public and community groups

Horsham Society and Horsham Blueprint Neighbourhood Forum indicated support but believed as currently drafted it gives too much prominence to design reflecting locally distinctive character as opposed to excellent modern architecture and is therefore unsound.

A member of public felt that the policy would result in the destruction of the countryside surrounding Crawley.

##### Developers and Agents

Homes England were of the view that the policy needs amending to recognise the opportunity of strategic allocations to create new defensible boundaries.

##### Statutory Consultees

National Gas Transmission and National Grid Electricity Transmission both requested that a criterion to ensure respecting existing site constraints including utilities situated within sites are considered.

Crawley Borough Council supported the reference to making efficient use of land (in the context of overall high quality design). However, it considered that this part of the policy would be more effective if evidence based minimum density standards were put forward for more urban locations and for the strategic site allocations.

The High Weald AONB Joint Advisory Committee were pleased with the reference to the High Weald AONB Housing Design Guide. However, to give it due weight, they recommended strengthening wording to criterion 8 to clarify it also applies on land affecting the setting of this landscape, together with supporting text as to its purpose.

<b>Support – Strategic Policy 19</b>	
<b>Number of Comments</b>	<b>5</b>
<b>Summary of Comments</b>	
<p><u>Members of the Public and community groups</u> Rudgwick Preservation Society were pleased to see reference to Village Design Statements and that they continue to have statutory importance.</p> <p>The Woodland Trust supported the presumption for retention of trees, hedgerows and other green infrastructure in line with NPPF para’s 8 c) and 20 d).</p> <p><u>Parish Council</u> Forest Neighbourhood Council supported the policy as it is very relevant to Horsham Town and particularly relevant to allocations HOR1.</p> <p><u>Developers and Agents</u> General support for the policy was provided.</p> <p><u>Statutory Consultees</u> NHS Property Services indicated support for the inclusion of policies, such as this, that support healthy lifestyles noting the connection between planning and health, and that the planning system has an important role in creating healthy communities.</p>	

## Strategic Policy 20: Development Principles

<b>Object – Strategic Policy 20</b>	
<b>Number of Comments</b>	<b>8</b>
<b>Summary of Comments</b>	
<p><u>Members of the Public and community groups</u> The Horsham Society and Horsham Blueprint Neighbourhood Forum both indicated support for the aims of the policy but considered that criterion 5 should be re-worded in a way that makes it clear that the requirement for development to be “locally distinctive in character” does not preclude good modern architecture. Alternatively, they were of the view a separate criterion which encourages good modern architecture could be inserted.</p> <p>A representation was received requesting an additional criterion: “Does not adversely affect the use of existing footpaths and bridleways.”</p> <p><u>Parish Council</u> Forest Neighbourhood Council indicated that they would like criterion 6 to be expanded to ensure that the energy efficiency is sufficient to provide a neutral carbon footprint by harvesting of grey water, etc.</p> <p><u>Developers and Agents</u> A representation was received suggesting that criterion 3 should be altered to read: “Is designed to avoid <u>an unacceptable level of</u> harm to the amenity of existing and future occupiers...;”</p> <p>In addition, a view was made that including the provision of tree lined streets (criterion 7) should apply to major development only.</p> <p>Another commented that it would be useful if the policy signposted to other policies in the Plan.</p>	

#### Statutory Consultees

National Highways requested that in addition to the requirements in criterion 10, it should include support for measures that reduce the need to travel (including suitable local facilities and/or connections to similar existing facilities) and public transport connections to bus and train stations, to encourage longer distance trips (which otherwise would be likely to use the SRN) to be made by sustainable modes.

### **Support – Strategic Policy 20**

<b>Number of Comments</b>	5
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#### **Summary of Comments**

##### Members of the Public and community groups

Gatwick Airport indicated support for the policy but suggested expanding the supporting text to give greater clarification on the basis for making decisions on whether or not to grant permission for noise sensitive development in areas exposed to aircraft noise, and in cases where permission is able to be granted, the requirements for any mitigation measures.

##### Parish Council

North Horsham Parish Council supported the policy, highlighting criterion 7 (regarding trees) as particularly important.

##### Developers and Agents

A comment was received that supported the requirement to make efficient use of land in order to conserve and enhance the natural and built environment, and deliver beautiful and sustainable buildings and places.

##### Statutory Consultees

NHS Property Services indicated support for the inclusion of policies, such as this, that support healthy lifestyles noting the connection between planning and health, and that the planning system has an important role in creating healthy communities.

## **Policy 21: Heritage Assets and Managing Change within the Historic Environment**

### **Object – Policy 21**

<b>Number of Comments</b>	5
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#### **Summary of Comments**

##### Members of the Public and community groups

One representor felt that an additional criterion should be added to read: “Any proposal should not reduce the curtilage of the heritage asset.”

##### Developers and Agents

One comment received felt the use of the word “preserve” within Policy 21 was inconsistent with the approach set out within Chapter 16 of NPPF which has a greater emphasis on “conservation” rather than “preservation”. Another representation was of the view the wording of the policy should be reviewed to reflect that of NPPF paras 194 – 208.

##### Parish Council

Storrington and Sullington Parish Council suggested that the NPPF required HDC to provide 'exceptional' and 'wholly exceptional' reasons why it is necessary to cause damage to the setting of listed buildings and the policy should be strengthened to reflect such requirements.

#### Statutory Consultees

Although supportive of the policy, the High Weald AONB Joint Advisory Committee suggested an additional criterion be added to reflect the important role that the historic public realm plays in defining the rural landscape character of the rural areas particularly within the AONB:

"Proposals should conserve historic public realm features which cumulatively contribute to the rural landscape character particularly within the AONB."

In addition, they also wanted a reference to the historic environment in the AONB included within para 7.6:

"The historic environment is also fundamental to the distinctive character, sense of place and natural beauty of AONBs."

### **Observation – Policy 21**

<b>Number of Comments</b>	<b>1</b>
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#### **Summary of Comments**

##### Statutory Consultee

West Sussex County Council commented that paragraph 7.12 may wish to refer to the West Sussex Minerals & Waste Safeguarding Guidance for clarity.

### **Support – Policy 21**

<b>Number of Comments</b>	<b>2</b>
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#### **Summary of Comments**

##### Statutory Consultees

Historic England welcomed the inclusion of policies for the historic environment within the Local Plan that meet the obligation for preparing the positive strategy required by the NPPF. The key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment (para 196) had in their view been met. They were of the view that previous comments they had made had largely been addressed.

Surrey County Council welcomed reference to the provision of a minerals resource assessment where appropriate.

## **Policy 22: Shop Fronts and Advertisements**

No specific comments were recorded in relation to this policy.

# Strategic Policy 23: Infrastructure Provision

<b>Object – Strategic Policy 23</b>	
<b>Number of Comments</b>	<b>34</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
<p>Horsham District Scouts raised concerns that the policy does not adequately reflect the need in the District for inclusive community youth space to enable young people to take part in volunteer led activities to supplement outdoor sport and formal education. They propose an additional policy to directly address this both on urban extensions which may make use of existing facilities and on larger, more self-contained development where facilities need to be delivered from scratch.</p>	
<p>The Horsham Society were concerned that the policy does not do enough to require specific actions of specific infrastructure providers to ensure required mitigation is delivered as planned.</p>	
<p>While Horsham District Cycling Forum supported the provision of walking and cycling networks, they raised concerns that the Plan does not tackle the issue of rural car dependency and poor sustainable transport infrastructure, particularly between settlements which are relatively close to one another.</p>	
<p>Campaign to Protect Rural England objected on that basis that the policy itself does not reflect the supporting text and does not place more requirements on developers to engage with infrastructure providers on wastewater treatment infrastructure.</p>	
<p>Concerns were also raised in respect of highways infrastructure and its ability to cope with the development proposed in the Plan.</p>	
<u>Parish Council</u>	
<p>North Horsham Parish Council raised concerns about healthcare, specifically A&amp;E provision, and the use of the phrase “sufficient capacity” without an explanation of how this is quantified. They also highlight the importance of early delivery of infrastructure to support associated development.</p>	
<p>Forest Neighbourhood Council and Horsham Blueprint Neighbourhood Forum objected to the policy on the basis it is not sufficiently robust, and that there should be binding commitments on developers to ensure required infrastructure is delivered.</p>	
<p>Cowfold Parish Council indicated their objection was based on the lack of specific reference to highways traffic mitigation through the Cowfold Air Quality Management Area, and the lack of recognition of the importance of green corridors and connected green spaces.</p>	
<p>Rusper Parish Council objected on the basis of transport and highways, water supply and wastewater, electrical power production and healthcare, specifically GP surgeries and the lack of proposals for a new hospital.</p>	
<p>Southwater Parish Council identified concern with current infrastructure provision and that this would be exacerbated by further development – which is not guaranteed to deliver infrastructure.</p>	
<p>Thakeham Parish Council raised concerns about the burden new development would place on local infrastructure and identified existing deficiencies that they sought solutions to.</p>	

### Developers and Agents

Homes England, promoter of West of Ifield, have proposed a number of amendments to the policy, referencing the vision of the local plan to reduce attractiveness of private motor vehicles and encourage walking and cycling, and the need to ensure highways capacity is not increased in a way that undermines this. They also make reference to the 'monitor and manage' approach outlined in the Department for Transport's Circular 1/22 and the use of evidence to inform when, and if, infrastructure should be delivered in line with an agreed implementation strategy.

A number of site promoters and developers, as well as the House Builders Federation, raised concerns about the soundness of the policy, in particular the requirement that the phasing of development should take account of infrastructure capacity. A number also objected to developers being required to take account of infrastructure capacity where infrastructure providers have a statutory duty to meet identified demand. There were a number of suggestions for amendments, ranging from the removal of the policy altogether to changes in wording of the supporting text and the policy itself to make clear the policy referred specifically to development and associated infrastructure identified in the Plan.

It was suggested that there should be further consideration of the CIL exemption policy to ensure viability issues do not prevent development coming forward and also proposed wording amendments stipulating that new infrastructure should be directly related to the development and should not undermine the delivery of the plan.

### Statutory Consultees

Southern Water objected to the policy based on incorrect terminology used in the policy to refer to water infrastructure. They requested a change in wording to make clear that network capacity required to accommodate new development should be assessed via engagement with water infrastructure providers, and not wastewater treatment capacity as stated in the policy.

NHS Property Services objected to the policy on the basis that it does not explicitly give healthcare providers flexibility in how healthcare needs resulting from development might be met and that this should be done through engagement between the local planning authority and the NHS and NHS partners.

West Sussex County Council have issued a holding objection on the basis that it does not reflect the vision-led approach laid out in the West Sussex Transport Plan 2022-36. They were of the view that the policy should refer to the "monitor and manage" approach to infrastructure delivery. They also suggest there should be reference to the potential for Infrastructure Management Groups in the policy.

## **Observation – Strategic Policy 23**

**Number of Comments**

7

### **Summary of Comments**

#### Members of the Public and community groups

The current capacity of local secondary schools was raised an area of concern.

#### Parish Council

Ashington Parish Council commented against two paragraphs:

- 8.1 - The Council must consider the cumulative impacts of any development; this is one of the most important aspects of the Local Plan as currently developments are looked at in isolation. All developments in one parish will affect neighbouring parishes.
- 8.5 - It is an essential element when considering an application to have studies which determine whether the proposal will lead to overloading of existing infrastructure.

### Statutory Consultees

Thames Water have provided comment on the policy, highlighting the importance of early engagement between developers and water providers to ensure supporting infrastructure, particularly upgrades with a long lead time, is in place in time to support development.

Crawley Borough Council have commented on the policy on the basis of the following:

- Clarification required re: the reference case model for the Transport Study and how this differs from the CBC evidence base for the Crawley Borough Local Plan
- Noting a degree of uncertainty around impacts on the Strategic Highways Network and mitigation that might be required on M23
- Need to ensure no additional burden is placed on CBC
- HDC's potential engagement in a Transport Infrastructure Management Group with CBC, the local highways authority and National Highways.

West Sussex County Council commented on references made in site allocation policies to shared / public transport and suggested this could be strengthened. Reference to Fastway bus lanes should be amended, in their view, to enable non-Fastway buses to use the lanes.

## **Support – Strategic Policy 23**

### **Number of Comments**

7

### **Summary of Comments**

#### Members of the Public and community groups

Horsham District Cycling Forum support the policy's promotion of connected walking and cycling networks.

Horsham District Scouts support the release of land being dependent on adequate community facilities being provided to support development.

#### Developers and Agents

General support for the policy was expressed with comments made by some promoters indicating that they conform with the policy in respect of sites being progressed.

#### Statutory Consultees

The Environment Agency supported the phasing of development in line with the required supporting infrastructure and associated environmental protections.

NHS Property Services supported the reference to healthcare infrastructure made in the supporting text of the policy.

Network Rail support the policy, in particular the reference to the use of planning obligations and CIL as well as Grampian conditions to secure delivery of infrastructure. They also suggest there could be reference to the IDP.

## **Strategic Policy 24: Sustainable Transport**

### **Object – Strategic Policy 24**

### **Number of Comments**

19

### **Summary of Comments**

### Members of the Public and community groups

The main points raised were:

- The policy fails to consider cumulative impacts of all development.
- Inappropriate to refer to e-scooters which are not road legal.
- The Plan should set out acceptable walking and cycling distances.
- Consideration should be given to green hydrogen powered vehicles.
- Should be clarification of what is meant by minimum infrastructure needed to enable EV charging installation in future.
- Bus routes should as a matter of course connect villages to town centres and stations.
- There remains no consideration to upgrade Great Daux Roundabout.
- The Plan should provide for a proper traffic census for each development that comes forward.
- Consider proposed west of Crawley link road to be flawed as its design renders it ineffective.
- Insufficient attention given to impacts of new development traffic on road network around Rusper.

### Parish Council

North Horsham Parish Council sought a strengthened approach to the 20 minute neighbourhood and bus provision and considers that e-scooter use should not be encouraged as they are not legal on public land.

Cowfold Parish Council stated that the Plan fails to take reasonable consideration of traffic and air quality implications, specifically in the Cowfold AQMA.

Horsham Blueprint Neighbourhood Forum supported the aims of the policy but considers it to be weak whilst there are no firm and funded plans to run better bus services.

Thakeham Parish Council wanted plans to ensure that their parish is provided with gigabit capable broadband to sustain homeworking.

Upper Beeding Parish Council commented on a lack of plans for rail improvements, as well as parking and road infrastructure, in the context of increased number of commuters from new development. They viewed that the proposed development sites were car reliant and bus service was poor.

West Chilmington Parish Council felt that the wording of 8.10 was 'so weak as to be rendered pointless', explaining that they did not understand the reference to new development working hard to improve limited bus services. They continued by explaining that the Council must ensure infrastructure (including transport networks) to support new development.

### Developers and Agents

A site promoter objected to requirement for all homes to provide a bespoke space for home working.

### Statutory Consultees

West Sussex County Council issued a holding objection pending completion of the highway safety study, sensitivity testing of Great Daux roundabout in its current layout (given funding issues with proposed improvements), and an 'apportionment exercise' to understand the impacts of specific development sites. Other comments requested specific word changes to the policy and text, for example to better reflect a monitor and manage approach.



National Highways requested that the policy makes direct reference to Circular 01/22, specifically with regard to 'vision and validate/monitor and manage', and that National Highways be listed as a required consultee.

## Observation – Strategic Policy 24

**Number of Comments** | 5

### Summary of Comments

#### Members of the Public and community groups

The main points raised were:

- It is essential that robust 'traffic impact studies' are undertaken for developments at Partridge Green
- Provision of adequate transport provision must not be used as an excuse to avoid building community facilities within a short walking distance of their homes.

#### Statutory Consultees

Crawley Borough Council noted there was possible inconsistency between levels of development assumed to occur in Crawley borough as part of Horsham's transport modelling, as compared with actual development quanta planned for in their local plan. In addition, CBC wished to understand how the form, scope, timing and cost of their own local plan mitigation may be affected by development proposed in the Horsham District Local Plan, e.g. how the specific impacts of the Plan on the Strategic Road Network can be assessed and monitored. CBC also strongly reiterated their view that the full Crawley West Multi-modal Corridor should be delivered in full alongside the early phase of the West of Ifield strategic development.

Surrey County Council wished to be consulted on submissions to bring forward sites located close to the A24 to understand how a reduction in motorised vehicular trips will be encouraged and the potential impact on the A24 and other routes entering Surrey.

## Support – Strategic Policy 24

**Number of Comments** | 5

### Summary of Comments

#### Members of the Public and community groups

The main points raised were:

- Support development of sustainable and active travel across Horsham. The town is a ready-made cycling hub, with all provisions accessible by bike (and public transport).
- Some specific routes within Horsham Town have been highlighted for potential cycling and/or public transport improvement.
- Support the principle of development providing options for sustainable travel.
- Improvements to bus services will help the environment.

#### Developers and Agents

A site promoter indicated support for the policy and suggested that their proposal aligned with the approach.

#### Statutory Consultees

Network Rail supported in particular part (e) of the policy.

## Policy 25: Parking

<b>Object - Strategic Policy 25</b>	
<b>Number of Comments</b>	<b>13</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
A query was made as what is meant by “a minimum the infrastructure to enable easy installation in future” in paragraph 5 of the policy and for the Council to detail this.	
<u>Parish Councils</u>	
Ashington Parish Council commented that the policy should also address the additional parking required by local amenities resulting from new developments.	
Cowfold Parish Council were of the view that the policy needs to be amended to ensure that parking provision is appropriate to need. They opined that in rural areas the average number of vehicles per household is often 3 or above, not for reasons of affluence but as a necessity. They felt that the use of WSCC data with regard to the number of car parking spaces per dwelling is inappropriate for rural towns and villages.	
North Horsham Parish Council thought that clause 2 of the policy should highlight that the parking must be sufficient and designed to prohibit pavement parking.	
Southwater Parish Council did not feel that the Policy reflected that some Neighbourhood Plans had introduced specific parking guidance and that this should be reflected in the supporting text and policy as suggested below:	
<ul style="list-style-type: none"><li>- Paragraph 8.18 first line to read: “The number of car parking spaces provided should similarly be in line with adopted standards, <u>currently either locally adopted parking standards in neighbourhood plans or the latest the West Sussex County Guidance on Parking at New Developments, whichever is more recent</u>, and taking into account guidance on parking standards and design that may be produced by the Council.”</li><li>- First line of criterion 2 on the policy to read: “Adequate parking facilities in accordance with adopted <u>local parking standards guidance or the latest West Sussex County Council Guidance on Parking at New Development, which is more recent</u>, must be carefully designed into development to meet the needs of users whilst achieving people-focused streets.</li></ul>	
<u>Developers and Agents</u>	
Numerous comments were made on the policy by site promoters. Some thought that elements were ambiguous or unjustified (and thereby contrary to NPPF paragraph 16). A comment received thought that the reference to ‘adequate provision’ should be removed. Another thought the policy inflexible.	
Another commented that reliance should not be had to standards that sit outside of the Local Plan and/or that such standards should be set out in policy.	
<u>Statutory Consultees</u>	
West Sussex County Council made a number of suggested changes, including:	
<ul style="list-style-type: none"><li>- Extend final sentence of para 8.16 to add “and also that over-provision is avoided which could undermine sustainable mode share”</li><li>- Reference should be made to the needs of disabled car passengers in para 8.18.</li></ul>	

- In para 8.19, reference should be made to WSCC Guidance of Parking at New Developments in respect of the proportion of new car parking spaces that must be provided with EV chargers and of cable ducting for later addition of further charges
- Policy criterion 8 should be amended to state that loss of existing private off-street parking spaces will also be allowed where a site is redeveloped with change of use to a use with a lower assessed need for parking.

## Support - Strategic Policy 25

### Number of Comments

4

### Summary of Comments

#### Developers and Agents

Gatwick Airport Limited (GAL) indicated support for clause 9 of the policy, noting the wording/approach was consistent with an equivalent policy used in Reigate and Banstead and that supporting text had been amended to respect previous views.

Another comment indicated support to compliance with the latest WSCC adopted parking standard.

#### Statutory Consultees

Crawley Borough Council indicated strong support for criterion 9 of the policy, which recognises Gatwick Airport as the most sustainable location for airport-related parking.

## Policy 26: Gatwick Airport Safeguarding

### Object – Policy 26

#### Number of Comments

6

#### Summary of Comments

#### Members of the Public and community groups

CAGNE submitted a representation objecting to the policy on the basis that it does not sufficiently consider the impact of expansion at Gatwick Airport, and of Airspace Modernisation, on communities in Horsham District. They highlighted the impact on existing communities as well as the proposed allocation West of Ifield.

#### Developers and Agents

Homes England objected based on the following:

- the policy should reference the Crawley Western Multi Modal Corridor, which is proposed to be delivered as part of the West of Ifield development, and the small scale highways works that will be required within the area safeguarded by the policy
- allowance should be made for ancillary infrastructure, such as SuDS, which might be appropriate in the safeguarded area, and could be delivered without impacting future expansion at the airport,
- the wording of the policy removes the ability of the planning authority to apply any planning balance in respect of proposals impacting the safeguarded area and should be removed.

Gatwick Airport Limited objected to the policy on the basis that:

- it should be split to sit as two policies, one dealing with aerodrome safeguarding (as a legal requirement) and the other with safeguarded land.

- The policy is undermined by the policies map allocation for HA2 Land West of Ifield, which overlaps with the land safeguarded for the expansion of the airport.

Statutory Consultees

Waverley Borough Council objected to the policy on the basis of the Climate Change Emergency declared by Waverley BC in September 2019 and the need for a reduction in carbon emissions throughout the aviation industry.

**Support – Policy 26**

<b>Number of Comments</b>	<b>1</b>
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**Summary of Comments**

Statutory Consultees

Crawley Borough Council supported the inclusion of a policy seeking to prove a consistent approach with the Crawley Local Plan. They requested amending the Policy to mirror changes made to the wording of CBC’s equivalent policy (GAT2) in the Main Modifications Local Plan, which has been agreed with the airport operator and which were requested by CBC’s Local Plan inspectors for soundness.

## Strategic Policy 27: Inclusive Communities, Health and Wellbeing

**Object – Strategic Policy 27**

<b>Number of Comments</b>	<b>44</b>
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**Summary of Comments**

Members of the Public and community groups

Save Rural Southwater and Stammerham Amenity Association objected because the policy does not identify the need for, or propose to deliver, a hospital in the District. This concern was shared by a number of members of the public along with general concerns around access to local healthcare facilities.

Horsham District Scouts requested the policy is amended with an additional point which addresses the need for services and facilities for young people meeting for social and organised activities.

Horsham Society and Horsham Blueprint Neighbourhood Forum objected to the policy on the ground that it is unclear which development will be expected to deliver which requirements.

Developers and Agents

A number of site promoters, objected on that basis that the policy is not clear about which development would be expected to delivery certain requirements outlined in part 2. They propose minor rewording to make clear this should be delivered “where relevant”.

Another comment was received that the policy was not justified and is too onerous.

**Observation – Strategic Policy 27**

<b>Number of Comments</b>	<b>3</b>
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## Summary of Comments

### Members of the Public and community groups

A comment was made about the need for places of worship and other facilities which meet the needs of the faith community across the District.

### Parish Council

Rusper Parish Council raised the importance of addressing health and wellbeing through Plan policies.

## Support – Strategic Policy 27

### Number of Comments

5

### Summary of Comments

#### Parish Council

North Horsham Parish Council supported the policy.

#### Developers and Agents

A comment was received supporting the policy.

#### Statutory Consultees

Sport England indicated support for the policy and its synergy between the policy objectives and national Active Design Guidance.

NHS Property Services and Network Rail supported the policy and its promotion of healthier lifestyles.

## Policy 28: Community Facilities, Leisure and Recreation

## Object – Policy 28

### Number of Comments

16

### Summary of Comments

#### Members of the Public and community groups

Comments made included:

- The policy does not comply with NPPF, September 2023 paragraph 99 [note that this is now Para 103]. The policy (criterion 3b) weakens the protection to open space, sports and recreational buildings to focus on resisting loss due to viability, quality and demand considerations.
- Sporting need is different to other community facilities (e.g. pubs) and needs to be assessed differently. The policy should refer to the need for a sporting needs assessment.
- Comments from the Reg 18 consultation have been ignored.
- The policy is deficient in addressing the regard to be given to the loss of golf facilities, failing to address paragraph 99 of the NPPF September 2023.

Scouting was recognised as important in one set of comments, with it being stated that as the population expands, new provision would be needed. More generally, a view was offered that the Local Plan does not reflect the needs of young people, especially for indoor space and that an assessment of needs should be linked to not only expected population but also number of users, size and activity as different groups have different needs. It was stated that shared facilities do

not always work well for Scouts Groups and that the Council should adopt a strategy for adequate provision for indoor spaces to meet needs beyond sport and education. Amendments were suggested to include reference to meeting places including those for young people, and a new policy to provide indoor spaces suitable for young people to meet.

#### Parish Council

Rudgwick Parish Council stated that the Regulation 18 Consultation Report stated that Rudgwick Parish Council supported Policy 46 (now renumbered as Policy 28) and that this was incorrect. They consider that the policy does not comply with NPPF Para 99 [Now Para 103] and weakens the special protection needed for sports and recreation facilities and recommended redrafting Policy 28 to ensure that the special protection of NPPF 99 is not reduced by failure to reference the test of 'sporting need' as clearly laid out in the national planning policy.

#### Developers and Agents

Comments from the development industry included the following:

- It was unsound to state that the community use of schools will be supported but should be in addition to that required to meet generated needs.
- Applicants should not be held accountable for existing shortfalls. The policy should be amended to set out that the open space requirements in Table 4 only seek to offset the demand created from an individual development unless otherwise identified in the IDP.
- Table 4 sets out local minimum standards of size for community spaces and buildings but fails to make clear where facilities or open space would be supported by way of an infrastructure contribution or CIL. The policy should be amended to provide clarity on this point.
- This policy is considered to be unsound as it is not based upon proportionate evidence to justify the requirement for community infrastructure to be delivered within the built up area boundary (BUAB). A more positive approach to the delivery of the facilities should be taken and with modifications to allow development outside the BUAB.
- The policy is too restrictive. The policy should be suitably worded to clarify the position on the loss of accessible community facilities. A clause should be inserted into the policy clarifying that the complete or part loss of publicly accessible community facilities will only be permitted in respect of criterion 3. Christ's Hospital School provide facilities that are private and for use for pupils only. As such, it has no impact upon the wider population whether private facilities and services within the school are retained.
- There should be an additional policy included within the HDLP which supports the development / growth of schools enabling schools to plan to improve and upgrade their existing educational facilities with more certainty than the current policy context allows.
- Criterion 3 should be reworded to give greater clarity on requirements to fully accord with the NPPF

#### Statutory Consultees

Sport England made the following comments:

- Para 8.47 - The opening sentence will encourage school providers not to open their facilities to community use. Not always feasible for development to meet sport and recreation needs without recourse to schools, such as 3G or sand based Artificial Grass Pitches. Recommend deleting this sentence.
- Evidence base - The Council's Playing Pitch Strategy and Built Facilities Strategies were adopted in 2019 and should be reviewed and updated.
- Sport England Playing Pitch Calculator – the policy should note that this calculator referenced in Table 4 is not available to the public. It should be used in concert with an up to date Playing Pitch Strategy. Where the need for a full pitch is not generated financial contributions should be sought.
- Policy Criterion 3.b) should be amended. It is not consistent with para 103 of NPPF, Dec 2023 (para 99 of the NPPF, Sept 2023). The potential loss of sport and recreation facilities

is not to be assessed against financial feasibility, a marketing exercise or the other criteria listed. Demand for facilities, or lack of, should be assessed against the NPPF and robust evidence base including Playing Pitch Strategy and Built Facilities Strategies. Assessment should use a recognised method such as the Sport England’s Assessing Needs and Opportunities Guidance.

NHS Property Services Ltd whilst supportive of community facilities generally did not consider the proposed policy approach to be positively prepared or effective in its current form and could have a harmful impact on the NHS’s ability to ensure the delivery of essential facilities and services for the community. Additional wording was suggested to exempt NHS estate redevelopment from alternative community use.

<b>Observation – Policy 28</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Neighbourhood Council</u>	
Horsham Trafalgar Neighbourhood Council stated that they wanted to ensure that new developments have much better green spaces within them than previous developments and that associated with this, existing developed areas (e.g. Trafalgar) have their few green spaces preserved as a commitment and as part of the plan.	

<b>Support – Policy 28</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Parish Council</u>	
North Horsham Parish Council stated that they supported accessible facilities for all residents.	

## Strategic Policy 29: New Employment

<b>Object – Strategic Policy 29</b>	
<b>Number of Comments</b>	<b>26</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Comments included:	
<ul style="list-style-type: none"> <li>- The policy should encourage the retention or replacement of good quality office accommodation in Horsham Town Centre and resist any trend for offices to move to other employment locations.</li> <li>- The policy should make explicit that applications for employment use on those sites which are allocated for employment use or identified as an existing employment use in Neighbourhood Plans will be supported by the District Council.</li> <li>- The policy should require space for home working in all new dwellings to assist in the delivery of the net zero target.</li> <li>- The policy should include guidance for Neighbourhood Plans with regard to what should be included for green industries, home working, employment land and modern communication technologies.</li> </ul>	

Comments were received suggesting that allocations should be removed. This included EM1, Land South of Star Road and Land at Brinsbury College.

With regards to EM1 and EM2, comments were received which stated that the site boundaries should be redrawn to exclude the ancient woodland and a minimum 50 metre buffer maintained between development and the ancient woodland. Surveys to complete the Ancient Tree Inventory were also requested.

#### Developers and Agents

A number of site promoters put forward a view that their sites should be allocated/recognised in the policy. These are listed in the omission sites summary. Reasons given for additional sites varied, but included:

- The evidence base is lacking / the wider economic needs should be assessed and planned for including the Coastal West Sussex area.
- The employment target is too low / the allocation of 17 hectares of employment land is the lower end of the potential demand outlined in the EGA.
- The Local Plan / SP29 does not sufficiently plan for future economic growth in the District and will fail to deliver the necessary employment land / SP29 is ineffective in addressing the economic issues it purports to address.
- There is a shortage of local employment opportunities / not sufficient opportunities to be sustainable or address out commuting.
- SP29 will not create conditions in which businesses can invest, expand and adapt, and will be ineffective in providing at least 1 job per new home.
- There is a lack of high quality employment land in the District.
- There is a shortage of business floorspace in both the type and size needed / further employment sites both of small and larger scale are needed / further consider sites capable of expansion and intensification.
- There is a need to enhance the rural economy and diversity of rural employment space.
- There is an over reliance on committed sites, larger strategic housing allocations and the protection and upgrading of existing sites to address employment needs.
- There may not be incentives for existing, poor quality spaces to regenerate and/or to meet Minimum Energy Efficiency Standards (MEES) standards.
- There is only one unit greater than 50,000sqft available (noting this has yet to be built out) within Horsham, and a limited selection of smaller units, most of which are located to the north of the District.

Comments on specific elements of the policy included:

- The policy is too vague. It is unclear whether an application must comply with all 10 criteria, or alternatively just one. Criteria 4, 5 and 6 are not spatially defined by a location. Additionally, some employment generating uses are not compatible with residential and other commercial uses. The requirement for economic development to accord with a settlement hierarchy fails to acknowledge the differences between planning for new homes and planning for economic growth.
- Policy Criterion 1 – the requirement to provide a mix of employment tenures is too restrictive if this relates to the delivery of both freehold and leasehold.
- Policy Criterion 3 – it is not considered necessary to restrict a use ‘outside of a defined centre’ to Class E(g) when a Sui Generis use, or indeed a storage and distribution use may be appropriate. It conflicts with criterion 8 if proposals outside of a defined town centre must be use class E(g) because it is not possible to support B2 and B8 uses in those same locations as indicated by criterion 8.
- EM2 Land at Graylands Estate – The policy should ensure the impact of additional vehicle movements on Phase 3 of the Mowbray development is addressed because, as part of



the Mowbray development, the Langhurstwood Road is to be stopped up and traffic rerouted through Phase 3.

- EM3 Land at Broomers Hill Business Park, Pulborough – Object to the uses listed (ie B2, B8 and ancillary office E(g)) which are more restrictive than, and therefore conflict with, the emerging Pulborough Neighbourhood Plan (i.e. B2, B8 and all types of Class E).

### Observation – Policy 29

**Number of Comments**

1

**Summary of Comments**

#### Statutory Consultee

West Sussex County Council commented that paragraph 7.12 may wish to refer to the West Sussex Minerals & Waste Safeguarding Guidance for clarity.

### Support – Strategic Policy 29

**Number of Comments**

8

**Summary of Comments**

#### Members of the Public and community groups

A comment received welcomed the inclusion of home and hybrid working.

#### Developers and Agents

Though there was some concern over certain policy requirements, landowners for EM1, 2, 3 and 4 all indicated support for their allocation. The landowner for the commitment of Land at Brinsbury College supported its recognition.

#### Statutory Consultees

Brighton & Hove City Council agreed that it would be important to ensure that the identified pipeline of sites with extant permission is maintained over the Plan period, and that additional sites are allocated to allow for choice and flexibility. They also commented that it would be important to ensure that those extant sites listed in Table 5 where development has not yet started are adequately protected in the new District Plan.

Crawley Borough Council supported the approach as it plans to meet the District's employment needs based on 'Labour Supply', including latent demand.

National Highways commented that the aspiration to retain and grow businesses within the District will directly support Circular 01/22's aims of managing the safe and efficient operation of the SRN, by providing a greater range of opportunities for residents to work locally. They recommended that this should be identified as a positive outcome of successful policy implementation.

## Strategic Policy 30: Enhancing Existing Employment

### Object – Strategic Policy 30

**Number of Comments**

13

**Summary of Comments**

Members of the Public and community groups

Comments received suggested that the policy should be amended to include steps to encourage the retention or replacement of good quality office accommodation in Horsham Town Centre and resist any trend for offices to gradually move to other employment locations. Another comment received suggested that Table 7 should be rearranged to an alphabetical place sequence (e.g. to ensure that all of the sites in Horsham town are listed together).

Developers and Agents

Comments received included:

- That the policy is too restrictive in protecting employment uses on KEAs, with some owners suggesting it should be removed to allow their site to come forward for residential or other uses.
- The protection of sites outside of Key Employment Areas is unjustified.
- The marketing timescales and required details are unjustified.
- Clarification is required as to whether this policy and its criteria are considered relevant to sui generis use for Development Management purposes.
- There should be policy support for 24 hour operation at sites and to ensure that this is protected, enhanced and intensified to meet requirements.
- The quality of some existing premises is poor and should not be protected for employment uses.
- Criterion 4 should provide flexibility to enable adaptation to changing market demands and criterion 4. b) should be replaced with “provide the same or higher amounts of employment density and flexibly designed business premises.”
- Criterion 5 – this could be a restriction on use of previously developed land (PDL) land and brownfield sites should not have to meet all the criteria.
- Criterion 7 is too onerous, more flexibility should be written into the policy to support the redevelopment of sites in a sustainable location.
- The policy should specifically confirm that where a site has been identified or allocated for employment in a Neighbourhood Plan it will be supported.
- The policy should be amend the policy to include ‘appropriate sui generis uses’ as employment in addition to B2, B8 and E(g)ii / iii Use Classes currently detailed in the policy.

There were comments to remove some sites from recognition as a KEA, with other sites being suggested as being suitable for KEA designation. Boundary amendments were suggested for the Graylands Estate.

Statutory Consultees

Natural England stated that the Employment Policies do not cite the importance of protecting and enhancing landscape and biodiversity and requested this be made more explicit.

**Support - Strategic Policy 30**

**Number of Comments**

6

**Summary of Comments**

Parish Council

North Horsham Parish Council indicated that they supported criterion 7 relating to the approach not to retain commercial buildings and not permit changes to residential units without compelling reasons.

Developers and Agents

A number of site promoters supported the identification of their sites as KEAs.

Comments were received which viewed that the policy had sufficient flexibility and supported the upgrading and refurbishment of sites.

#### Statutory Consultees

National Highways commented that the aspiration to retain and grow businesses within the District will directly support Circular 01/22's aims of managing the safe and efficient operation of the Strategic Road Network, by providing a greater range of opportunities for residents to work locally. They recommended that this should be identified as a positive outcome of successful policy implementation.

Brighton and Hove City Council (BHCC) indicated that they strongly support the policy as it seeks to protect existing B2, B8 and E(g) class uses and encourage their upgrade and refurbishment. They added that any additional provision in neighbouring local plans which could help BHCC address its current and potential future unmet employment needs would be supported, should suitable opportunities be identified.

## Policy 31: Rural Economic Development

<b>Object – Policy 31</b>	
<b>Number of Comments</b>	<b>6</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Amendments to the policy's supporting were sought, including:	
<ul style="list-style-type: none"><li>- The policy is farm and countryside focussed but suggests all new economic development in the countryside will be subject to the policy. The supporting text should define rural economic development to make clear if the policy only relates to development/diversification of farms/farm estates or whether it relates to all economic development proposals outside of built up area boundaries, including the Old Brickworks and site to the north near Henfield.</li><li>- Paragraph 9.27 does not recognise those who hybrid or home work following Covid nor show the economic benefit from those who work from SMEs and micro-businesses. It does not include tourism or renewable energy production and storage, some of the most likely additions to the rural economy.</li><li>- Paragraph 9.30 makes it important for Neighbourhood Plans to be reviewed and updated to reflect both the changes to the NPPF, this Local Plan and the needs of those who live and work in their defined areas (eg Nuthurst and Lower Beeding Neighbourhood Plans).</li></ul>	
Objections to the policy included:	
<ul style="list-style-type: none"><li>- There is limited reference to agriculture and food production. Rewilding and regenerative farming is mentioned ahead of sustainable, viable agricultural businesses. It is important to retain rural farming community and to help businesses improve efficiencies.</li><li>- There should be a specific chapter focusing on the needs of agriculture and the rural economy in any future iterations.</li></ul>	
<u>Developers and Agents</u>	
Some respondents sought amendments to the policy as follows:	
<ul style="list-style-type: none"><li>- The policy should be amended to make clear sites allocated in Neighbourhood Plans are supported (e.g. The Old Brickworks near Henfield).</li></ul>	

- The policy is too vague and uncertain. Areas outside of settlements are not solely the preserve of agriculture but support a number of economic development opportunities.
- The policy will fail to deliver necessary employment land
- it should be clearer as to whether all three criteria or just one must be complied with.
- It is considered inappropriate and vague for the policy to support development where it “contributes to the sustainable custodianship of the countryside”.

In relation to its promotion of the Land West of Ifield strategic site Homes England, sought an amendment to criterion 2 of Policy 31 so that it reads as follows “Outside built-up area boundaries, secondary settlements or strategic site allocations...”.

Natural England were of the view that the Employment Policies do not cite the importance of protecting and enhancing landscape and biodiversity a inclusion of the following: “Employment applications will be comply with the provision of Strategic Policy 16 and 17.”

### Support – Policy 31

**Number of Comments**

3

### Summary of Comments

#### Members of the Public and community groups

Supportive comments included:

- Support for paragraph 9.26, 9.28 and 9.29
- Support the commitment to improve local employment opportunities in rural areas through association with both farming and non-farming enterprises.

#### Developers and Agents

One set of comments indicated that they supported the policy for the following reasons:

- More robust and supportive than the Reg 18 draft policy.
- Sequential approach welcomed.
- More in line with the NPPF.
- Pleased less constrained by specific requirements (such as providing 1 years’ worth of marketing evidence)

## Policy 32: Conversion of Agricultural and Rural Buildings to Commercial, Community & Residential Uses

### Object – Policy 32

**Number of Comments**

8

### Summary of Comments

#### Members of the Public and community groups

Three commentators noted that the policy was restrictive because criterion 1 reduces the scope to agricultural and forestry buildings. Two of the three commentators suggested criterion 1 be removed completely to ensure that policy is not silent on non-agricultural / non-forestry buildings. The other suggested amendments be made to demonstrate that the: a) current use of the building is no longer necessary, or b) the proposal would secure the future of an existing heritage asset or a building worthy of retention”

All three commentators noted that the text should reference 'community and commercial uses' alongside residential.

One comment suggested that site clearance should not be permitted prior to a HDC arboricultural and ecology survey being undertaken.

Developers and Agents

One comment sought confirmation that development within strategic site allocations would not fall within the definition of the rural area and would not be required to comply with these policies, an issue that is exacerbated by the lack of clarity around the status of strategic allocations as part of the settlement hierarchy. They recommend that Policy 32 wording is amended so that it begins with 'Outside built-up area boundaries, secondary settlements or strategic site allocations'.

Statutory Consultee

Natural England were of the view that the employment policies did not cite the importance of protecting and enhancing landscape and biodiversity.

<b>Observation – Policy 32</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
One consultee made an observation that the policy could be strengthened by making changes to criterion 1(a) to state that that the existing use is no longer needed before it can be converted so as to ensure that the conversion of rural buildings should be based upon what the most sustainable use of that building would be, at that time and in that location.	

No supportive comments to the policy were recorded.

## Policy 33: Equestrian Development

<b>Object - Policy 33</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Statutory Consultee</u>	
Natural England were of the view that equestrian development can have harmful landscape and biodiversity impacts and that policy wording could be introduced to prevent this.	

<b>Observation - Policy 33</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Members of the public</u>	
A comment was made that HDC could lead the way and support safe access for all to the countryside, including by horse riding, along and between its public right of way network.	

No supportive comments to the policy were recorded.

## Strategic Policy 34: Tourism Facilities and Visitor Accommodation

<b>Object – Strategic Policy 34</b>	
<b>Number of Comments</b>	2
<b>Summary of Comments</b>	
<u>Members of the Public and Community Groups</u>	
A comment expressed that the policy was restrictive by only supporting re-use of existing buildings, which may not be accessible for all (including those with mobility issues). It was suggested that a less restrictive approach may be more encouraging.	
<u>Statutory Consultees</u>	
The Environment Agency advised that the policy could be strengthened by referencing green tourism and the value that habitats and landscape have in attracting tourism.	

<b>Support – Strategic Policy 34</b>	
<b>Number of Comments</b>	1
<b>Summary of Comments</b>	
<u>Members of the Public and Community Groups</u>	
Comments were made supporting both the policy and supporting text as it recognised the importance of tourism to the local economy and the role of farm diversification projects to achieve this.	

## Strategic Policy 35: Town Centre Hierarchy and Sequential Approach

<b>Object – Strategic Policy 35</b>	
<b>Number of Comments</b>	5
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Horsham District Scouts questioned whether the policy should require leisure uses to be located within the main shopping area.	
<u>Parish Council</u>	
North Horsham Parish Council objected to the policy on the basis that the Town Centre First approach risks undermining local, neighbourhood facilities which can be accessed sustainably and support community cohesion.	
<u>Developers and Agents</u>	
A comment was received objecting to the lack of reference in the policy to neighbourhood centres which might be delivered as part of larger allocations.	
<u>Statutory Consultees</u>	
Crawley Borough Council requested two amendments to the policy:	
<ul style="list-style-type: none"> <li>- The Policy should include reference to centres outside the district, in the context of Land West of Ifield and the potential for impact on Crawley Town Centre.</li> <li>- Clarity around the quantum of retail capacity being planned for.</li> </ul>	

<b>Support – Strategic Policy 35</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Statutory Consultees</u>	
<p>Crawley Borough Council supported the town centre first approach and proposes HDC refers to the Main Modifications document of its own (CBC) Local Plan for amendments that could be made given the Use Class E’s lack of spatial boundaries. They also supported the 500sqm threshold for impact assessment, an approach recently tested at the CBC Local Plan examination.</p>	

## Strategic Policy 36: Town Centre Uses

No specific comments were noted in relation to this policy.

## Strategic Policy 37: Housing Provision

<b>Object – Strategic Policy 37</b>	
<b>Number of Comments</b>	<b>132</b>
<b>Summary of Comments</b>	
<u>Members of Parliament</u>	
<p>Jeremy Quin, former MP for Horsham, expressed a strong objection to the overall level of housebuilding proposed. He considered it to be unsustainable and called into question its legal soundness in the context of the Habitats Regulations. Though pleased that some strategic sites had not been allocated, he expressed concern that the north of the District had borne the brunt of development over the last 20 years and was expected to continue to receive the bulk of new building.</p> <p>Andrew Griffith MP argued that the Plan imposes unwanted over-development on green fields in rural parts of the District, ignores the wishes of local communities as expressed in neighbourhood plans and allocates sites that were previously refused. He was of the view that the Plan fails to make better use of Horsham’s brownfield land availability across the larger towns of the District and objected to number of individual sites.</p>	
<u>Members of the Public and community groups</u>	
<p>Objections were wide ranging, often linked to development in particular locations or around themes by which certain groups were focussed upon. Comments generally thought the amount of development proposed was too high. It was common for representations to question whether the amount of development could be accommodated due to infrastructure concerns (e.g. health, education, transport, utilities, leisure). Other views expressed included:</p> <ul style="list-style-type: none"> <li>- The Local Plan should propose a much lower figure than that calculated by the standard method.</li> <li>- Once water neutrality is no longer a constraint, housing numbers will increase and need to include an allowance for unmet need elsewhere.</li> <li>- The level of growth will cause coalescence between different settlements.</li> <li>- The proposals will cause damage to the environment and are not informed by up-to-date ecological work.</li> <li>- Development had not been directed to brownfield sites.</li> <li>- Distribution to strategic sites was unsustainable and should be spread across the district.</li> <li>- The housing market is saturated/will become saturated.</li> </ul>	

- Development should be phased with Neighbourhood Plan sites coming first and allow communities to determine further sites.
- There is not enough water to accommodate the amount of development.

On the other hand, some argued that HDC should be meeting its identified housing need in full and should be doing more work on the use of “private water offsetting schemes” or “alternative water supply options”. Others argued that more housing allocations should be made to meet the fully identified need (shortfall of 2,275).

It was argued that the Local Plan should be phased, so that not all housing comes forward at once. The view expanded by explaining that the first phase should include sites identified in current neighbourhood plans. The subsequent phases could include future sites in Neighbourhood Plans.

One resident has asked why the buffer has been added to the requirement. They suggested that the Standard Method requirement should be used from Year 6 onwards (911) rather than the 901 currently being suggested. If the higher figure of 911 was used for years 6-17, then a figure of 456 could be used for Years 1-5, considering the restrictions imposed by water neutrality.

#### Parish Councils

Rusper Parish Council objected to the Standard Method target for Horsham District of over 900 dwellings a year and opined that it could rise to 1,200 a year if updated with 2021 population census data and to 1400 a year if required to include an extra 200 from Duty to Cooperate with Crawley. They did not view that such a rate of growth would be sustainable given the shortage of water in the south east. They also were of the view that the policy over-allocated of houses in the Rusper area (intensification in North Horsham, Kilnwood Vale and West of Ifield) and that the rationale for this had not been provided. They also considered the explanation of the Plan’s precise 13,212 dwellings to be confused.

North Horsham Parish Council expressed concern about the inclusion of Land at Cuckmere Farm site due to flooding, access and the proximity to the boundary to Warnham Parish. They also sought clarification on whether the intensification of 500 homes was in addition to 400 homes at Mercer Road or not. They were also of the view that development at Cuckmere Farm and Mercer Road would narrow the gap between Horsham and Warnham.

Southwater Parish Council thought that evidence was both lacking and inconsistent for the justification of the housing target. In terms of its relationship with water neutrality, they were not of the view that the target could be met without breaching water neutrality requirements. They also felt that the SA failed to explain how the numbers had been arrived at – as the preferred strategy assessed differs in quantum from that identified in the Local Plan. They also commented on the distribution of development and identified that the number of homes to be provided at West of Southwater did not vary despite a number of different options being considered. They put forward an alternate strategy that they viewed would be more sustainable.

West Chiltington Parish Council felt that the maths in the box was unclear and that this should be addressed, with further explanation about deficits and the responsibility for meeting such deficits.

#### Developers and Agents

It was common for the development industry to suggest that the housing requirements were too low. A large number suggested that sites that they were promoting should be allocated to accommodate unmet needs in Horsham District and/or in neighbouring authorities. A number of those with allocated sites suggested that their site could accommodate a greater amount of



development than identified and/or should be expanded to include other land parcels. It was stated in numerous comments that the Plan was too reliant on windfall delivery.

Many comments received suggested that water neutrality should not be used as a reason to limit development. It was common for comments from the development industry to argue that water neutrality was not a land use planning matter and should be dealt with by other regulatory regimes and/or Southern Water's Water Resource Management Plan. Other comments received suggested that housing requirements should be reviewed once SNOWS is up and running or commit to an early review.

Other comments included:

- That additional requirements to settlements for allocation in Neighbourhood Plans should be provided
- The stepped trajectory is not justified.
- Concern about the availability of water credits – though conversely some viewed that the Council did not have regard to development being brought forward without relying on SNOWS.
- The trajectory should be redone.
- The buffers applied to housing requirements had changed.
- Past under supply of housing should be spread across the plan period.
- Exceptional circumstances had not been demonstrated to deviate from the Standard Method calculation.
- Small sites should be allocated to provide 10% of the Plan's supply.

#### Statutory Consultees

Brighton & Hove City Council raised concerns that HDC is not meeting its identified housing need in full. They commented that "it is assumed that longer term solutions to the current water neutrality constraints will enable the increased levels of housing later in the Plan period".

Arun District Council thought that while the environmentally constrained approach taken was understandable, the position has cross-boundary implications. They believed that the previously identified levels of growth in earlier versions of the Plan should be committed to as originally evidenced. They did not view water neutrality as an absolute constraint over the plan period and noted that earlier versions of the Local Plan would help address wider needs in the sub-region. They suggested an early review would be necessary as the position on water neutrality evolves.

### **Observation – Strategic Policy 37**

**Number of Comments**

6

#### **Summary of Comments**

##### Members of the Public and community groups

One comment received expressed that a failure of the Plan to deliver the full housing requirement could provide a justification for a full Plan review.

##### Statutory Consultees

Mole Valley District and Waverley Borough Councils noted the Council's position in terms of housing requirements but explained that they were not able or likely to meet HDC's needs.

Network Rail explained that they'd like to work with the developers of Land North of Horsham to work out a solution to the high risk at the Roffey Road level crossing.

<b>Support – Strategic Policy 37</b>	
<b>Number of Comments</b>	<b>13</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Some comments received supporting the policy/elements of the policy included:	
<ul style="list-style-type: none"> <li>- Growth in population gives rise to housing need.</li> <li>- Development is supported near urban areas, thus maximising existing infrastructure.</li> <li>- Smaller sites to accommodate housing need are welcomed.</li> <li>- The policy had not included some strategic sites (e.g. Adversane, Buck Barn, Mayfield and West of Billingshurst)</li> </ul>	
<u>Developers and Agents</u>	
There was support to the identification of 1,795 dwellings from smaller site allocations.	
<u>Statutory Consultees</u>	
Mid Sussex District Council welcomed the longstanding, ongoing and effective engagement with HDC on cross-boundary strategic matters and stated that HDC is maximising housing supply as far as possible given water neutrality constraints.	
Chichester District Council identified support for the approach in the policy.	
Crawley Borough Council supported the approach in considering the extent to which it is unable to meet needs of authority areas with closest links to Horsham. They did express that they would like to see housing numbers updated to base 2024 and considers SP37 would be more effective by identifying the distribution of unmet need across each year of the Local Plan period.	

## Strategic Policy 38: Meeting Local Housing Needs

<b>Object – Strategic Policy 38</b>	
<b>Number of Comments</b>	<b>8</b>
<b>Summary of Comments</b>	
<u>Members of the Public and Community Groups</u>	
An objection was received as the Plan did not allocate specific sites for custom and self-build development. Another comment was received that sought additional wording to be added to criterion 3 of Policy 38 to include 'larger family homes' if supported by robust evidence of local need.'	
Another representation was of the view that the policy did not reflect the findings of the SHMA in terms of mix, types and tenures.	
<u>Developers and Agents</u>	
A comment received objected to the policy on the grounds that the mix of housing sizes, types and tenures in the draft plan were not consistent with the recommendations made in the SHMA. There was also concern that the SHMA gives a higher objectively assessed figure than the one used in the draft plan.	
On a similar vein, another developer objected to the policy because it seeks to apply a housing mix to all housing, market and affordable, which, in some instances might hinder delivery. Their view was that housing mix should be responsive to the market and be as flexible as possible to ensure the policy remains effective throughout the plan period.	

Concern was raised that the policy did not meet the unmet housing needs of Crawley Borough Council, with it being suggested that instead of reducing the housing requirement, the Council should explore opportunities to allocate additional suitable sites for housing where delivery is capable within the short-term and a bespoke Water Neutrality solution is capable of being implemented.

Two developers noted that dwelling mix should be informed by local demand, with one developer making a suggested modification to criterion 1 to insert the wording “evidence produced by local estate agents and experienced developers” after “.... Strategic Housing Market Assessment or any subsequent updates.”

### Observation – Strategic Policy 38

**Number of Comments**

7

#### Summary of Comments

##### Members of the Public and Community Groups

One community group noted that there is significant need for larger homes for families with higher numbers of children and dependents. The respondent recognised that the draft policy supports, ‘A level of provision that differs from the Council’s register may be accepted if supported by robust evidence of local need’ and wished to note the importance facilitating the provision of new larger family sized homes of greater than 5 bedrooms under this policy.

Another community group acknowledged that the allocation of a particular site will assist in diversifying housing and provide increased choice for the local community who potentially cannot afford to buy a house in the locality. There was an observation from one member of the Public that both Lower Beeding and Nuthurst Neighbourhood Plans have not met their identified local housing needs.

##### Parish Councils

Storrington and Sullington Parish Council made the observation that HDC had not provided them with an identified housing need and therefore they should not have to comply with the policy.

##### Developers and Agents

One developer wanted clarity on what evidence could be used to justify a housing mix.

Another comment received suggested the following amendment to point 1 of Strategic Policy 38 to address cross boundary considerations of need where proposals are adjacent to Horsham’s boundary.

### Support – Strategic Policy 38

**Number of Comments**

5

#### Summary of Comments

##### Developers and Agents

A comment was received that they were in full support due to the fact that it will assist HDC in meeting its housing requirement. They also noted that smaller scale sites can be delivered quicker than larger strategic sites and as such supported the approach taken. An observation was made that the needs of the older population must be met through housing provision as some of the homes will need specialist support, ranging from specialist nursing facilities to sheltered housing with an on-site warden, and extra-care housing which has tailored clinical services on-

site. Other properties may simply be designed to be smaller or more suited to those with limited mobility.

## Strategic Policy 39: Affordable Housing

### Object – Strategic Policy 39

#### Number of Comments

43

#### Summary of Comments

##### Members of the Public and community groups

Reasons for objecting to the policy/considering the policy to be unsound included:

- It does not address build out rate of affordable housing
- Strategic sites (including intensification of existing allocations) should provide 40% affordable housing as a minimum
- Affordable rent at 80% of market rents is often above the Local Housing Allowance and therefore inaccessible to most
- The policy does not engage with alternative affordable housing types as the SHMA recommends.
- Claw back clauses should be considered to raise affordable housing delivery.
- There is a failure to provide enough affordable housing

##### Parish Councils and Neighbourhood Forums

Horsham Blueprint supported the aims of the policy but noted past failures to deliver expected numbers of affordable homes, and was of the view that the policy did not address the issue of build-out rates of affordable homes.

##### Developers and Agents

Comments covered a number of concerns with regards the interpretation of the policy, and the deliverability of objectives. Most representations considered the target affordable housing provision from non-strategic greenfield sites to be too high and risked non-viability, although different alternative targets were suggested. Some commented that further allocations were needed that would deliver affordable housing. Most comments related to conventional self-contained houses and flats (C3 Use Class) although some were particular to older people's housing in its various forms. The two groups of further key comments are summarised separately below.

##### Self-contained residential units (non-specialist – Use Class C3)

Key issues raised included:

- The policy is convoluted and needs simplification. Policy wording is inconsistent with the NPPF.
- The policy should make more explicit reference to circumstances when a reduced amount of affordable housing would be considered.
- To seek higher proportions of affordable housing than the minimum target provides no certainty to developers as the requirement could be increased on a development-by-development basis.
- The policy is too inflexible and prescriptive, for example regarding exceptional circumstances justifying a different approach, or what adjustments may be made to achieve viability.
- Housing needs evidence is insufficient to justify the high affordable housing target.

- The proposed 45% target is higher than and out of step with emerging local plans for the other local authorities in the HMA – Crawley 40%, Mid Sussex 35%
- The most/only effective way of increasing affordable housing provision is to increase overall supply.
- The proposed increase in the target for greenfield will create difficulties for developers who have long-term options.
- The policy puts undue burden on greenfield sites compared with brownfield.
- The policy should include a priority system for local connections criteria.
- The calculation of affordable housing should be based on net increase and not the gross number.
- The policy fails to prioritise First Homes which contradicts national policy.
- The discount for First Homes should be 30% instead of 40% to ensure viability.
- There should be a time limit for marketing new affordable homes subject to local connection criteria.
- The robustness of the findings of the Local Plan viability study is questioned. Points of challenge were assumptions on land value; not all draft allocations tested for viability; costs of biodiversity net gain; water neutrality; increased costs of developing housing (construction, labour, planning and consultancy); CIL rates are out of date; overly tight developer margins, and inflated affordable housing revenues.
- Delivery of the policy in practice will be challenging given current funding climate and
- Prioritising social rented housing over affordable rented housing is unachievable via S106 agreements with current funding structures. There is a lack of affordable housing providers willing to provide social rented housing.

#### Specialist housing

- The policy target in respect of self-contained specialist housing for older people on greenfield land is not clear.
- The policy should state that specialist housing for older people may be an exceptional circumstance where flexibility on affordable housing is needed.
- Most sites for older people’s housing are on brownfield land and should have a lower affordable housing targets.
- It is not practical to deliver affordable housing units as part of a retirement or extra-care housing scheme as the additional cost of a typical care package will be unaffordable to those who qualify.

#### Statutory Consultees

NHS Property Services suggested the consideration of affordable housing for NHS staff and others employed in the health and care sector, due to issues of recruitment.

### **Observation – Strategic Policy 39**

**Number of Comments**

6

#### **Summary of Comments**

##### Members of the Public and community groups

It was observed that the lack of affordable housing in the District has a disproportionate impact on younger people. It was also observed that this could exacerbate the District’s characteristic of having an above average proportion of people in older age cohorts, with implications for economic activity. A comment was made that Councils should utilise decommissioned land previously used for infrastructure for social housing.

##### Parish Council

Storrington and Sullington Parish Council observed potential challenges with delivering on policy targets at a particular site proposed for allocation.

Rusper Parish Council query as to whether 40% affordable housing is really viable. It seems as though the viability risk for developers has not been adequately assessed and mitigated.

#### Developers and Agents

A common observation from developers and their agents was that affordable housing delivery in Horsham District has historically been lower than expectations on meeting need or than local plan targets. It is also observed that even with higher policy targets, on the basis of the proposed overall housing target for the Plan period, the full need for affordable housing won't be met.

### **Support – Strategic Policy 39**

<b>Number of Comments</b>	<b>5</b>
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#### **Summary of Comments**

##### Members of the Public and community groups

The Horsham Community Land Trust expressed support for the policy, in particular recognition of CLTs, subject to developers of brownfield sites being pushed to achieve higher than the minimum 10% threshold. They also supported the prioritisation of social rented homes over affordable rented, and believe that affordable homes should remain in the ownership of suitable organisations to allow in-perpetuity affordable status.

##### Developers and Agents

Whilst they have registered their comments as objections, most developers and their agents supported the principle of affordable housing forming part of the overall mix of housing on qualifying sites.

## **Policy 40: Improving Housing Standards in the District**

### **Object –Policy 40**

<b>Number of Comments</b>	<b>3</b>
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#### **Summary of Comments**

##### Members of the Public and community groups

Two comments objected to policy 40 on the grounds of lack of evidence to support the implementation of the Nationally Described Space Standards (NDSS) requirements with one commentator also suggesting that an inflexible policy approach to the NDSS could impact on affordability and customer choice.

One respondent noted that the requirements of Building Regulations Approved Document M4(2) requires a parking space capable of being enlarged to 3.3m wide to allow wheelchair access. The comment viewed that this was in conflict with the requirement of Policy 25.

### **Support – Policy 40**

<b>Number of Comments</b>	<b>1</b>
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#### **Summary of Comments**

##### Members of the Public and community groups

A comment was received in support of the policy.

## Policy 41: Rural Exception Homes

<b>Object - Policy 41</b>	
<b>Number of Comments</b>	2
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
<p>A comment was made that the criteria set out at point 2 of the policy were too stringent and not necessary, given the main point of this policy is to meet need. They opined that if a suitable site has been identified, it should be able to meet unmet needs across the district.</p>	
<p>Another commented that exceptional circumstances are not required to bring forward a rural exception site, which can come forward in any rural location to meet local needs, and are by nature, an exception to the usual spatial strategy. Their view was that is unreasonable to restrict sites to settlements defined in the Development Hierarchy as all sites would have limited access to services and facilities. They also did not support imposing a criterion that restricts the size of a rural exception site to be proportionate to an existing settlement as they viewed that the extent of local needs will be the determining factor to influence the quantum and scale of a proposal. The point was made that flexibility to recognise that market housing may be needed in some cases to deliver schemes and ensure affordable housing needs are met.</p>	

<b>Support - Policy 41</b>	
<b>Number of Comments</b>	2
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
<p>Supportive comments were made, with one noting that their site is being progressed utilising the policy provisions.</p>	

## Policy 42: Retirement Housing and Specialist Care

<b>Object - Policy 42</b>	
<b>Number of Comments</b>	9
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
<p>A range of views were provided:</p> <ul style="list-style-type: none"><li>- Policy should allow unallocated sites to accommodate this type of housing.</li><li>- Viability work should be redone to account for older persons affordable housing on previously developed land.</li><li>- The policy would restrict delivery of specialist housing.</li><li>- The policy should encourage growth of existing sites.</li></ul>	
<p>A number of comments felt that sites that they were promoting were suitable to meet the needs for such provision as HDC had not allocated sufficient sites to meet needs.</p>	

<b>Observation - Policy 42</b>	
<b>Number of Comments</b>	<b>2</b>
<b>Summary of Comments</b>	
<u>Member of the Public and Neighbourhood Groups</u>	
A comment was made recognising the link between the elderly population and lack of affordable housing and stating that consideration of how the provision of specialist accommodation may affect the economy if younger people can't live there.	
<u>Developers and Agents</u>	
A comment was made that the SHMA sets out that, given the ageing population and higher levels of disability and health problems among older people, there is likely to be an increased requirement for specialist housing options. They were also of the view that there is also a need to consider the needs of people with other specialist care requirements who are not necessarily elderly.	

<b>Support - Policy 42</b>	
<b>Number of Comments</b>	<b>2</b>
<b>Summary of Comments</b>	
<u>Member of the Public and Neighbourhood Groups</u>	
North Horsham Parish Council indicated support for the policy but that it was important that such provision had access to shops and services.	
<u>Developers and Agents</u>	
A comment was made from a promoter that their site would accord with the aims of the policy.	

## Strategic Policy 43: Gypsies and Travellers

<b>Object – Strategic Policy 43</b>	
<b>Number of Comments</b>	<b>28</b>
<b>Summary of Comments</b>	
<u>Members of the Public and Community Groups</u>	
Objections were received on multiple different proposed sites.	
A comment received on Site 5, Sussex Topiary noted that it was refused at appeal.	
Comments objecting to Site 6, Bramblefield included:	
<ul style="list-style-type: none"> <li>- access through Duke's Hill or Bramble Lane would be unsuitable.</li> <li>- Significant adverse impacts in respect of community safety, property values and legal expenses</li> <li>- Water neutrality issues have also been raised. One resident would like to see "significant adverse impacts" in the draft Policy expanded to include community safety, property value and legal expenses.</li> <li>-</li> </ul>	
Comments objecting to Site 7, Gay Street Lane included:	
<ul style="list-style-type: none"> <li>- impact on countryside; flooding and increase in traffic</li> <li>- lack of access to shops and facilities</li> </ul>	



- no footpath – but site access which includes a footpath would introduce conflict between vehicular and footpath users
- dangerous access to the A29

Comments objecting to Site 14, Downsview Paddock included that an enforcement notice for the removal of caravans had been issued and upheld by the Planning Inspectorate.

Parish Councils

Pulborough Parish Council have objected to the proposed allocation of Site 7, Gay Street Lane. They have raised the following reasons for objection:

- Noise issues from railway- decibels levels 92, which is above WHO recommendation of 45 decibels
- Objects to development on open countryside
- Impact on local infrastructure
- Environmental impact, including flooding
- Strain on local services
- Dangerous access
- Social cohesion

Rudgwick Parish Council and also raised an objection to the proposed allocation of Site 5, Sussex Topiary. They argue that:

- It was dismissed at appeal;
- There are too many pitches proposed for a small population.
- There are water neutrality issues

Henfield Parish Council have also objected to the proposed inclusion of Site 14, Downsview Paddock, on the basis that the recent Enforcement appeal against the site was upheld by the Planning Inspectorate.

Developers and Agents

Homes England (as the site promoter for Land West of Ifield) also objected, arguing that further justification is required, and modifications needed to provide greater flexibility and ensure the Plan remains effective over the Plan period. Specifically, they argue that it is:

- Unclear how number (15 pitches for Land West of Ifield) has been arrived at
- Further flexibility should be provided as due to the length of the Plan period, the need could change against assumptions made at this stage- therefore the number of pitches required should be an “up to” figure.
- Table 11 should therefore be amended to read, “Indicative additional net pitches”. And criterion b) amended to include “maximum number of additional pitches subject to evidence of need at the time of any planning application”.

Statutory Consultees

West Sussex County Council suggested that the wording for criterion 2b) should be strengthened to make clear that safe highway access is needed for all users, including pedestrians and cyclists.

<b>Observation – Policy 43</b>	
<b>Number of Comments</b>	5
<b>Summary of Comments</b>	
<u>Statutory Consultees</u>	
Arun District Council, Mole Valley District Council, Brighton & Hove City Council, Waverley Borough Council and Mid Sussex District Council all commented that they were unable to offer	

any assistance to accommodating Gypsy & Traveller & Traveller Showperson need in Horsham District.

### **Support – Policy 43**

**Number of Comments**

1

**Summary of Comments**

#### Statutory Consultees

The Environment Agency commented that they are happy that the policy includes a reference to “sites not being located in areas at high risk of flooding, and that sites have supply of essential services”.

## **Policy 44: Rural Workers Accommodation**

### **Object - Policy 44**

**Number of Comments**

2

**Summary of Comments**

#### Developers and Agents

A comment was made that criterion 1c) goes above and beyond the guidance for the development of rural workers homes, as set out in Paragraph 84a) of the NPPF, and was not justified a result. Instead, greater flexibility should be included within the policy.

Another comment suggested amending criterion 1d) to reflect the required size of the rural worker’s family, this is not a business premises alone but somewhere for the rural worker to live and hopefully thrive.

No specific comments of support were recorded.

## **Policy 45: Replacement Dwellings and House Extensions in the Countryside**

No specific comments were noted in relation to this policy.

## **Policy 46: Ancillary Accommodation**

### **Object– Policy 46 Ancillary Accommodation**

**Number of Comments**

1

**Summary of Comments**

#### Developers and Agents

A comment was received objecting to criterion 5 of the policy. This was that in their view the conversion of outbuildings to residential dwellings would not have a substantial impact to the physical layout of the property and would make efficient use of existing built form to support Horsham’s housing need.

No specific comments of support were recorded.

# Strategic Policy HA1: Strategic Site Development Principles

<b>Object – Policy HA1</b>	
<b>Number of Comments</b>	<b>11</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Comments included:	
<ul style="list-style-type: none"> <li>- Concern that the policy requirements cannot be achieved if implementing Strategic Policy HA2: Land West of Ifield.</li> <li>- Paragraph 10.79 should reiterate sustainable transport connections.</li> <li>- Paragraph 10.82 identifies the Playing Pitch Strategy but fails to mention non-sports facilities for young people.</li> </ul>	
<u>Parish Council</u>	
North Horsham Parish Council asked that the need for sustainable development and good connections is reiterated in paragraph 10.79.	
<u>Developers and Agents</u>	
Though supportive of the principle, one comment felt it unnecessarily duplicates criteria within the policy, and also elements of other Plan policies and suggested changes as a result.	
Another issue raised was that there was no proposed control on the percentage of new homes on strategic sites that should be supplied in the form of retirement or care housing. Therefore, the need for specialist older persons accommodation would not be met and specific allocations would be needed for such provision.	
Gatwick Airport Objected to omission of any reference to aerodrome safeguarding, and to the requirement of 12% biodiversity net gain given legislative context and due to the potential risk of bird strike at Gatwick Airport. Also requested criteria to deal with noise sensitive development in areas exposed to aircraft noise, and requirements for any mitigation measures.	
<u>Statutory Consultees</u>	
The Environment Agency requested reference to green <u>and blue</u> infrastructure, and should include a requirement that strategic scale development must not increase flood risk.	
National Highways requested that the current policy and text are adjusted to refer to a “Vision” for strategic sites which is consistent with the requirements of Circular 01/22 around Vision and Validate / Monitor and Manage principles.	
WSCC requested the addition of a requirement that strategic site developers undertake regular monitoring of their trip generation and travel plan measures for reporting to the District Council.	
Crawley Borough Council requested policy changes to make the policy effective, requiring infrastructure and active travel to be in place as early as possible in build-out, and that the infrastructure ‘package’ is delivered in full and operational by 2040.	

<b>Observation – Policy HA1</b>	
<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	

Comments received included:

- Note that policy criterion 4 seeking to minimise reliance on car journeys sums up a key requirement of new development.
- Health infrastructure is needed to support housing growth.

Statutory Consultee

Surrey County Council noted that the policy refers to ensuring development is supported by measures designed to reduce travel by private car but commented that this was not easy. They asked to be consulted on strategic sites to understand how trip reduction would be encouraged and the potential impact on the A24 and other routes entering Surrey.

**Support – Policy HA1**

**Number of Comments** | 3

**Summary of Comments**

Members of the Public and community groups

General support was provided and a specific comment supported the reference to a 12% target for biodiversity net gain.

Parish Council

Shermanbury Parish Council fully support the basic principle of attaching the more substantial housing supply developments (HA2, HA3, HA4) to already established, larger towns and villages, in order for residents to access services and facilities without the need to increase pressure on the local road network.

## Strategic Policy HA2: Land West of Ifield

**Objection – Policy HA2**

**Number of Comments** | 370

**Summary of Comments**

Member of Parliament

Henry Smith MP former MP for Crawley noted his presentation to the House of Commons of a petition of more than 7,300 local residents in opposition to Homes England proposals for up to 10,000 houses west of Ifield. A key issue relates to concern over pressures on infrastructure and that even 3,000 houses will have huge impacts, and development cannot be built without additional infrastructure delivered first. Additional concerns were expressed over Rusper Road closure, uncertain timetables and finances to deliver water use offsetting (water neutrality), biodiversity loss, threat to ancient woodland, loss of Ifield Golf Course, and loss of recreational land and access to rural space for Crawley communities.

Jeremy Quin, former MP for Horsham, identified concern that the north of the District has borne the brunt of development over the last 20 years and that the land between Horsham and Crawley (together with Billingshurst and Southwater) should not be expected to continue to be the target of future development without check.

Members of the Public, community groups and others

The campaign group Save West of Ifield submitted a series of detailed reports presenting their evidence for objecting, which in many cases relate to specific parts of the NPPF. Their evidence and themes have been reflected closely in many individual's representations to the Regulation 19 Local Plan and are therefore summarised in the summary below.

Objections to the site allocation were made on a wide number of grounds:

#### *Development strategy / principle of development*

Most representations received objected to the loss of countryside and habitats. It was stated that this is the last remaining area of accessible countryside immediately bordering the built-up town of Crawley. Further key points were:

- There has been significant housing growth in the north of Horsham District in recent years, therefore this is the wrong location for further strategic growth.
- The proposed development will lead to coalescence between Crawley and Horsham (and villages in between).
- The uncertainty around Gatwick Airport's growth calls into question the reliability of evidence and weighs against a strategic allocation in this Plan.
- The site (located in Rusper Parish) is not supported by the made Rusper Neighbourhood Plan.
- The sustainability assessment for the site was questioned.

Some noted that the Local Plan supporting text references promotion of a larger 10,000 home development beyond this Plan period, which would have further impacts.

#### *Golf*

The great majority of representations objecting to the site allocation cited the impacts of losing the Ifield Golf Course and questioned the effectiveness of mitigation. Many cited paragraph 99 of the NPPF [now Para 103] which sets out national policy criteria on acceptability of losing open space recreational and sporting facilities. Further key points were:

- The evidence upon which the Council depends is flawed (a number of technical submissions were made to support this point)
- The golf course is well used and there are few alternative golf clubs with space, therefore it is not surplus to requirements.
- No suitable replacement has been identified. On-site provision of alternative outdoor recreation and sports is not accepted.
- The facility and the open space support people's physical and mental health. The golf course is used by walkers as well as golfers.
- The golf club building is well used by the wider community. Loss of the club would mean people losing their jobs.

#### *Transport and movement*

Most objections cited the impact of development-related traffic increases. Other transport-related issues were linked to challenges of bus, cycling and walking access to and from the development. Key points were:

- The Horsham Transport Study is not robust and does not account for cumulative impacts.
- 3,000 new homes will result in many thousands of extra cars on the roads.
- The site is poorly connected to the major road network (i.e. no direct access onto the A264 or M23/A23).
- The development will increase traffic on the A264, M23 and associated junctions.
- The development fails to provide for a full link road (multi-modal corridor) between the A264 and M23, which is essential infrastructure that should be implemented ahead of any development.
- Closing off Rusper Road for motorists to take between Rusper towards Crawley will result in a more circuitous route, creating inconvenience and greater pressure on other, less suitable local roads. Existing residential roads will become more congested and act as rat runs. Emergency access will be hindered.

- Limiting new general traffic access to only one access point (where the new multi-modal corridor meets Ifield Avenue/Charlwood Road/Bonnetts Lane) will cause unacceptable pressure on local roads (in particular Ifield Avenue and through Charlwood Village in Surrey).
- It is unrealistic to assume high uptake of bus travel, cycling and walking, and a 15-minute neighbourhood won't be achieved. Therefore, traffic impacts have been underestimated.
- High levels of bus use won't be achieved as there are no bus routes/services going to Horsham town. Fastway bus services can't be easily integrated.
- Proposed cycle routes are poorly coordinated with existing routes in Crawley.
- Ifield Station is small, constrained and lacks any car parking / insufficient cycle parking. The proposed development will exacerbate over-use of the station and add to overcrowding on trains.
- The likely impacts of construction traffic over many years will blight existing communities.
- The policy does not address the needs of those with disabilities, children and young people with regards active travel.

#### *Air quality*

The key concerns regarding air quality were:

- Increased traffic from the site would enter the Hazelwick/Crawley Avenue AQMA compromising air quality management. This will impact negatively on human health, especially for vulnerable people e.g. children and the elderly.
- Additional traffic will generally worsen air pollution. This will be compounded by new Gatwick flight paths / airport expansion.

#### *Noise*

The key concerns regarding aircraft-related noise impact were:

- Insufficient detail given on negative impact of Gatwick Airport expansion on the site. Noise impact assessment not provided.
- Proposals should ensure that new housing and schools are built with additional noise protection.
- No strategic allocation should be made until the decision on Gatwick expansion has been made.

#### *Water and flooding*

Many representations expressed concern over the deliverability of a water neutral development, flood risk, and capacity to treat waste water. Key concerns were:

- Water neutrality is likely to be unachievable as proposed target (85 lppd) is unrealistic. There is no certainty over timetables and finances to deliver water use offsetting (water neutrality). There is no detail on the promised water neutrality plan for the site. The development won't comply with HRA requirements.
- Crawley Waste Water Treatment Works (WwTW) cannot take further sewage. Thames Water's timetable and finances for improvements or extensions are uncertain and an upgrade could take up to 10 years.
- Flooding will be exacerbated due to development of green fields, widening of flood plains impacting on the development site. There is no clear surface water and flood risk strategy.
- Development will worsen water quality in the River Mole, which is classified as poor or moderate quality.

#### *Biodiversity*

Most objections expressed concern that biodiversity and natural richness would be lost should the site be developed. There was scepticism as to whether biodiversity net gain would be delivered. Key concerns were:

- Much of the site is designated a Biodiversity Opportunity Area (BOA) which will be threatened.
- It is inevitable that adverse impacts will arise from the development on biodiversity assets including ancient woodlands and hedgerows on or close to the site, Ifield Brook Meadows Local Wildlife Site, the River Mole and Ifield Brook.
- The Environmental Impact Report (EIA) contains inaccuracies, omissions and contradictions. The outcomes of surveys undertaken are not clear.
- Many mature and valued trees will be lost to development.
- The Woodland Trust advise that site boundaries should be withdrawn to exclude any ancient woodland and ensure 50m buffer around ancient woodland outside of the site and that an Ancient Tree Inventory should be completed for the site.
- A substantial Bechstein's bats colony exists on and around the site. There has been suggestion that the area may qualify as an area as a Special Area of Conservation.
- Various other species will be threatened by development: red kite, buzzards, kestrels, sparrow hawks, yellowhammers, little egrets, tawny owls, foxes, deer, geese and other water fowl, mature oak, ash, hornbeam, great crested newts, long horn beetles, brown fritillary butterflies, kingfishers, skylarks, swan muscels, lapwings, turtle doves, dragonfly, hedgehogs, slow worms, vipers.
- There will be an impact on wider wildlife corridors. The Gatwick Greenspace Partnership provides evidence of their importance.

#### *Residents' amenity and recreational opportunities*

Most comments received expressed concern that existing resident's amenity would be significantly impacted by development, and many felt that valued aspects of the area's character as enjoyed by residents over many years would be diminished. Key points were:

- The site is Crawley's only remaining 'rural fringe' which is accessible to walkers from the built-up area, and should be protected as such for Crawley residents.
- The amenity value of what are currently rural public footpaths will be lost if they are channelled through urban development.
- The loss of open green space will be damaging to residents' physical and mental well-being.
- There will be many years of building and construction which will impact on existing residents' quality of life (e.g. noise pollution).

#### *Health, education and community infrastructure*

A great many of the comments made referred to current health care services being at or beyond capacity, and noted concern that the situation would be exacerbated by the proposed development. With regards education, concern tended more towards potential over-provision and questioning the need for more schools. Key issues were:

- The policy requirement to deliver local healthcare facilities on the site is unlikely to be viable and deliverable, given dependency on a third party to deliver this.
- GP surgeries in the area and East Surrey Hospital (closest A&E) are at capacity and should not be put under further pressure. This has been exacerbated by other big new developments happening in the Crawley area.
- There is a lack of (NHS) dentistry available in the area and this would worsen should this development go ahead.
- Evidence from WSCC suggests a reducing need for school places in future. It is questioned whether there is a pre-existing need for a secondary school.

#### *Other infrastructure*

Representations collectively recorded scepticism that community and other supporting infrastructure would be delivered in a timely manner, or at all, with many wanting to see all necessary infrastructure provided up-front. Examples of a Homes England-led strategic development elsewhere was cited as evidence of a lack of timely infrastructure delivery.

#### *Economy and employment*

Some representations challenged the premise that employment growth justified strategic housing growth west of Crawley, given changing patterns of employment. Key points were:

- There is an absence of a robust business case in that a detailed Economic and Employment Strategy has not yet been submitted.
- There is uncertainty over jobs being created in and around Gatwick Airport due to changing employment practices (e.g. automation, online shopping).
- There has not been due account taken of changing nature of jobs and industries at Manor Royal. There is a shift from higher density office employment to lower density and poorer paid storage and logistics.
- Employment development in Crawley is struggling to come forward. It is questioned whether more land for employment is needed at West of Ifield.
- Productive farmland would be lost as would the essential crops these produce.

#### *Heritage and landscape*

A large number of objections were made on grounds that heritage assets and landscape quality would be adversely impacted by development. Key points were:

- Ifield Village, Ifield Conservation Area and St Margaret's Church are adjacent to the development site and will be adversely affected. The surrounding area forms part of its setting and has not been duly taken account of.
- Ifield Golf Course is nearly 100 years old and is of landscape architectural merit.
- Ifield Court Farm is a heritage asset dating from 14<sup>th</sup> Century. Footpaths to it form part of the heritage asset. The rural setting will be lost.
- The Manor of Ifield [heritage asset] would be buried by concrete.
- It is believed there are archaeological remains of a large late Bronze age to Roman settlement, as well as of iron industry of 15<sup>th</sup> and 16<sup>th</sup> Centuries and of the Civil War (17<sup>th</sup> Century).
- Development would erode the New Town concept of a town within the country.
- The development would lead to coalescence between Crawley and Horsham, and of smaller settlements in the area. There is a lack of defensible boundary or defined landscape buffer.

#### *Housing quality/affordability*

Whilst it was understood that affordable housing would be provided by the development, many challenged whether new homes would be truly affordable or available to local people in housing need. Key points were:

- The housing to be provided will be unaffordable to local people. Affordable housing will be unavailable to Crawley residents.
- The new housing will attract more people to move from London, causing pressure on local services and creating further commuting to London / other areas.
- 40% affordable housing has not been tested in the viability study, therefore deliverability of this level of provision is questioned.
- There is no assurance that new buildings will be 'green' / net zero carbon, e.g. will there be solar panels on roofs, and rainwater and greywater recycling?

#### *Viability and deliverability*

Many objectors considered there was insufficient evidence that the development together with essential infrastructure would be viable or deliverable. Key points were:



- The Council's viability study did not take account of 40% affordable housing, an additional primary school, healthcare facilities or mitigation for the loss of golf facilities.
- There is insufficient evidence that the Crawley West Multi-modal Corridor will be delivered.

#### *Duty to Cooperate*

Many objections highlighted that Crawley Borough Council do not support the new development due to impacts on the town's infrastructure and the loss of open space to the west of Ifield. This was seen as evidence that the Duty to Cooperate has not been met.

#### *Consultation*

A number of objectors considered there to have been a lack of community involvement with regards the proposed allocation and/or emerging proposals for the site. Some considered this amounted to a failure to comply with the Council's Statement of Community Involvement (SCI).

#### Parish Council

Rusper Parish Council objected to the allocation of the site. It considered that the policies made within the Rusper Neighbourhood Plan have been ignored. Objections were raised with regards impacts on landscape, biodiversity, farming and agriculture, golf provision, environmental health due to exposure to noise and pollutants, deliverability and viability, poor proposed access/transport impacts/road safety, recreational impacts, health care, and water neutrality.

Colgate Parish Council objections related to pressure on GP and health services, delivery of water neutrality, traffic, flooding, poor public transport, and major/general infrastructure.

Notwithstanding objection in principle, specific modifications suggested sought to ensure water supply/efficiency monitoring, clear mechanism for raising local concerns with Government, and more robust evidence on traffic generation/impact.

Charlwood Parish Council considered insufficient weight is in the policy for protecting habitat and requested wildlife friendly policies such as hedgehog friendly fencing and wildlife corridors. They considered the bulk of development traffic would come through Charlwood parish and roads are insufficient. Combined impacts from Gatwick Airport have not been sufficiently considered in their view.

#### Developers and Agents

The site is being promoted by Homes England. Whilst supporting the allocation, they considered a number of modifications to the Strategic Policy HA2 and Policies Map necessary to make the policy effective, justified and consistent with other policies. This includes not restricting the number of homes to 1,600 within the plan period; modifying the multi-modal corridor safeguarding, and embedding the masterplan in the policy.

Two adjacent landowners objected on the basis that the allocation should also include further land parcels, whilst supporting the principle of development.

#### Statutory Consultees

The Environment Agency highlighted that the proposed access road and associated infrastructure is likely to be within the functional flood plain of the River Mole. They viewed that the policy should include more specific requirements than currently included in the policy. Wording was suggested to replace current criterion dealing with flooding.

Natural England advised that the masterplan does not reflect the importance of the area for an internationally significant species – the Bechstein's bat. They noted that the site is bounded by or includes various important habitat features. They had particular concern about the scale, quantum and location of development proposed which should be sensitively designed and

limited in scale. In their view, the policy does not demonstrate that impacts have been avoided and does not follow the requirements of the mitigation hierarchy contained in the NPPF.

Crawley Borough Council has reiterated its strong objection to the allocation of a strategic development site west of Ifield. They consider that the location is extremely sensitive in the setting of Crawley as a compact town in a countryside setting, and offers Crawley residents one of the best opportunities to access the wider West Sussex countryside. CBC highlight the Ifield Brook Local Wildlife Site within Crawley Borough and bordering the strategic development site. They also highlight the Ifield Village Conservation Area and the setting of the Grade 1 Listed Church, with views across the site. The site adjacent to Ifield is subject to flooding. It is also stated that Crawley Borough is at or over-capacity in terms of infrastructure, including roads, education, health services and sports facilities, and is not yet assured that sufficient mitigation of impacts arising from the development will be secured. Without prejudice to its overall objection to the site, CBC state that should the site be allocated, the allocation policy should incorporate the criteria set out in its own local plan in relation to 'at Crawley' strategic developments, in particular the Crawley Borough Local Plan paragraph 12.23. Key specific changes requested to the policy and supporting text include:

- Either the HDLP should take into account the future infrastructure needs of Crawley arising from longer-term development of up to 10,000 homes, or alternatively should make clear that no further development beyond the current proposed allocation is acceptable.
- The policy should not seek to boost employment opportunities, as it should only meet the needs of the new neighbourhood.
- Should the allocation be confirmed, there must be a commitment now to funding and delivering the full Crawley Western Multi-Modal Corridor, and should require the developer to deliver or fund such improvements that are necessary to prevent all traffic coming through residential areas of Crawley. Failing this, there should be agreement to include in the policy sufficient measures to manage the impact of traffic through Ifield and along Ifield Avenue.
- A housing mix specific to the site, and reflecting a blend of identified needs across the two local authorities, should be included in the policy.
- The policy should include a requirement for an impact test on Crawley Town Centre.
- In respect of the masterplan, CBC strongly objects to significant development of fields close to the Listed Church.

West Sussex County Council raised holding objections seeking wording changes to strengthen effectiveness, and suggesting that reference to safeguarding land in the multi-modal corridor area of search is removed due to risk of land blight.

Surrey County Council had concerns due to the absence of the need to take into account liaison with and agreement on specific items related to SCC and relevant borough/district authorities within Surrey.

Gatwick Airport requested a cross-reference between the policy and Figure 7 such that it is clear that development should not encroach beyond the 60 dB noise contour. They object to requirement for 12% biodiversity net gain due to risk of bird strike and were of the view that it should be amended to 10% BNG in line with legislation. Request reference to 'Gatwick Airport' not 'Gatwick area'. Policy should stipulate no development within Gatwick safeguarded area.

Thames Water highlighted the need for early engagement from developers of the site, as the scale of development is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. A housing and infrastructure phasing plan is recommended to keep Thames Water informed.

National Highways requested reference to Government Circular 1/2022 in the policy in respect of transport assessments.

Network Rail requested explicit reference to links to Ifield Station.

### **Observation – Strategic Policy HA2**

**Number of Comments**

**3**

#### **Summary of Comments**

##### Members of the Public and community groups

A comment was received that they were comfortable on the final decision in relation to the sites listed at paragraph 10.26.

##### Statutory consultees

Mole Valley District Council commented that the site has the potential for significant impact on the infrastructure of Mole Valley, and noted that strategic transport modelling shows that mitigation will be necessary to address traffic-related impacts. They considered that comprehensive mitigation will be required to deal with adverse impacts on the Mole Valley road network. MVDC indicated support for the proposed education provision and potential provision of healthcare facilities, and considered it essential that these are delivered early. The development appears to offer the opportunity for natural food management measures to reduce downstream flooding of the River Mole.

### **Support – Strategic Policy HA2**

**Number of Comments**

**3**

#### **Summary of Comments**

##### Members of the Public and community groups

Comments received in support of the allocation or policy elements included:

- Support development which will help address UK housing crisis and Horsham/Crawley are prime locations to do so.
- There is welcome for some of the progressive active travel proposals from the developer.

##### Developers and Agents

Homes England, as the site promoter, supported the inclusion of the land west of Ifield. In their view it is necessary to meet the future development needs of Horsham, support economic growth of the Gatwick Diamond and help meet housing needs across the wider North West Sussex Housing Market Area. Objections/modifications to the policy wording are covered in the summary table above.

An adjacent landowner supported development of the site in principle and supported the safeguarding of land to deliver in the long term the full multi-modal corridor, but this is subject to a less prescriptive corridor being shown on the map, i.e. a broader alignment or notation.

##### Statutory Consultees

The Department for Education supported the site allocation which includes a secondary school, explaining that there is a demonstrable need for this to meet both the needs generated by the development and basic need for school places in Crawley.

Crawley Borough Council supported many of the criteria of Policy HA2 without prejudice to its overall objection to the site's allocation. In particular, CBC welcomed the use of land adjacent to Crawley within Horsham District for a new secondary school.

# Strategic Policy HA3: Land North West of Southwater

## Object – Strategic Policy HA3

Number of Comments

130

### Member of Parliament

Jeremy Quin, former MP for Horsham, commented that Southwater had already received very substantial levels of development and should not be expected to continue to be the target of continuing development. His preference would be that development be spread across the district as a whole.

### Members of the Public and Community Groups

Save Rural Southwater and Stammerham Amenity Association submitted an objection to the allocation (their comments on water neutrality are covered in the summaries to Strategic Policy 9). Reasons for objection included:

- The allocation conflicts with a number of the Plan's objectives and strategic policies relating to the development hierarchy (2), coalescence (15), green infrastructure and biodiversity (17), and inclusive communities (27).
- The existing permission at Broadacres still has 300 homes yet to be completed.
- The village centre at Lintot Square is at capacity and will not be able to deal with the scale of additional development proposed.
- New homes would not "enhance open space and wildlife and provide biodiversity improvements" in para 10.102.
- There is no assurance that a new school will be provided, as set out in paras 10.102-10.104.

In addition, their comments viewed that the allocation was in conflict with the Southwater Neighbourhood Plan and impacts on some of its core principles. It also commented that there was inconsistency between para 10.100 and 10.101 about the allocation delivering either 'about' 1,000 homes or 'at least' 1,000 homes, with concerns expressed that if it is the latter 1,500 may be built.

A number of other representations made similar points to the above. In addition, other reasons for objections were offered. This included:

- Development would result in the loss of countryside and farmland, affecting trees and hedges and thus leading to wildlife and habitat loss.
- There was insufficient water to accommodate the new development.
- That recent rainfall had led to localised flooding and it was not clear that systems could cope with another 1,000 homes.
- There is no reference to improving wastewater treatment infrastructure
- Development would result in increased traffic congestion and parking difficulties.
- Southwater lacks sufficient infrastructure (health/education) to cope with additional people and this won't be provided for at all/delivered early
- Development will cause noise and air pollution, including by construction activities.
- Development should deliver improvements to cycling infrastructure both within Southwater but to Christ's Hospital and Horsham
- Policy compliant affordable housing would not be delivered
- It was not clear whether the development would make use of on-site renewable energy sources/development should be required to delivered homes with solar panels.

Additional/amended text was suggested to policy wording to include specific provision for young people at 2b and specific reference at 4a to the exclusion of ancient woodland from the development area with protection for ancient and veteran trees.

### Parish Council

Southwater Parish Council viewed that the allocation was not sound and in conflict with the Neighbourhood Plan, including by promoting two centres for the village. In terms of education provision, they were of the view that there was no sound strategy to ensure that the infrastructure is provided in a timely manner to support existing and future residents of the village and wider area.

In addition, they questioned the assumptions on build out during the plan period, suggesting that a lower figure of 450 would be most appropriate.

Policy amendments and additions were suggested, replacement of the word neighbourhood centre with leisure and service centre, and clarification that any retail provision would be a small shop. A new requirement for educational provision on site to commence in the first phase of development was requested.

### Statutory Consultees

West Sussex County Council stated that the policy does not effectively secure the delivery of the transport mitigation for the site in accordance with the vision-led approach to development outlined in the West Sussex Transport Plan and WSCC Walking & Cycling Strategy.

Specific comments included:

- Policy 7a) The WSCC Walking and Cycling Strategy is in the process of being replaced so reference should be added to successor documents. Also, it should be acknowledged that the schemes identified in the strategy are aspirations which may not all be deliverable so cannot be relied upon to come forward.
- Policy 7 ci) The new link road should not connect directly to the Hop Oast junction with wording amendments suggested.
- Policy 7 c vi) "the requirement for the sustainable link to Horsham to incorporate a second crossing of the A24 near to the Hop Oast junction in addition to the crossing facilities within the junction required by 7cii) has not been shown to be deliverable, so the wording should be relaxed to allow for more options that would deliver a safe, convenient and comfortable route for active travel.

In relation to education, it was explained that they would not support a new secondary school smaller than 6 forms of entry and that policy wording should be changed to reflect this.

Natural England was of the view that the Masterplan should be habitats-led and designed to avoid impacts to key habitats, protect and enhance biodiversity and support Nature Recovery networks. Wording to strengthen protection for important habitats and ancient woodland was requested.

Southern Water requested an additional policy to align with the delivery of sewerage infrastructure.

National Highways commented that there should be reference to Government Circular 1/2022 in the policy in respect of transport assessments and that the over-arching Travel Plan and Construction management Plan (including Construction Logistics) will need to be approved in writing by National Highways in addition to the LPA and LHA.

<b>Observation – Strategic Policy HA3</b>	
<b>Number of Comments</b>	<b>5</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
One comment received described the approach to meeting Southwater’s growth through a single allocation as risky and that other sites, (including theirs) should be allocated.	
<u>Statutory Consultees</u>	
Network Rail stated that they were supportive of car parking and cycle storage at Christ’s Hospital rail station requested inclusion of contribution towards improving access at the rail station to accommodate users and ensure fair and equitable access to the rail network because of increasing development.	
Surrey County Council noted that the allocation was sufficiently located from mineral and waste management interests in Surrey so as not to prejudice their continued and/or future operation.	

<b>Support – Strategic Policy HA3</b>	
<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
One member of the public indicated support for the allocation.	
<u>Developers and Agents</u>	
Christ’s Hospital School indicated support for the allocation and viewed it as capable of meeting significant needs. They were of the view that phasing should be included into the policy to ensure delivery at optimum times and of the right quantum.	
The site promoter (Berkeley Strategic Land) also supported the allocation of the site, though highlighted areas of the policy that could be amended. They explained that the policy should refer to approximately 1,000 homes and that they believe that 1,000 homes can be delivered in the plan period. Other comments included:	
<ul style="list-style-type: none"> <li>- Whilst supportive of the masterplanned approach, the policy wording and supporting text are in conflict and a comprehensive masterplan is yet to be agreed.</li> <li>- Figure 8 should be highlighted as being illustrative or be removed entirely.</li> <li>- Expressed of concern with the location of the secondary school in figure 8 as the location is not large enough to provide a school that meets WSCC’s requirements. An alternative site for the school has been proposed. Part 2d) should be amended so that proportionate contributions towards education provision are sought – as the demand for such provision is not solely related to the proposal.</li> <li>- The layout of the site, as expressed in figure 8, may mean that 1,000 homes would be undeliverable.</li> <li>- Though the principle of a neighbourhood centre is supported, the policy wording is too prescriptive and should be made more flexible.</li> <li>- The requirement for 12% BNG repeats policy elsewhere</li> <li>- Part 6 of the policy should refer to Strategic Policy 21 and wants “and preserve those elements of the of the heritage assets and their settings that are significant in illustrating their historic and architectural interest” removed from part 6 as they argue that it is inconsistent with NPPF para 202 test.</li> <li>- The new footway along Station Road at Christ’s Hospital is outside of the developer’s land ownership.</li> </ul>	

- Policy 7ciii) should refer to “at least” four accesses to provide flexibility.
- Policy 7cv) should clarify that Improvements between Cedar Drive roundabout and the school relates to Worthing Road. It should be specific as to whether it relates to the new primary, secondary school or both.
- Part 7vi) requires the provision of a sustainable link for pedestrians and cyclists between Southwater Village and Horsham, in the form of a bridge, underpass or signal-controlled toucan crossing close to Hop Oast roundabout. They are of the view that the requirement for a new crossing is not considered justified because a safe crossing will be provided through the signalisation of the Hop Oast junction and that this was acknowledged by WSCC in their response to the planning application.

## Strategic Policy HA4: East of Billingshurst

<b>Object – Strategic Policy HA4</b>	
<b>Number of Comments</b>	<b>67</b>
<b>Summary of Comments</b>	
<u>Member of Parliament</u>	
<p>Jeremy Quin, former MP for Horsham, was of the view that Billingshurst had been subject to substantial levels of development and that this should not continue due to pressure on services. He viewed that the most sustainable option has to involve a spread of development across not only the north but adding and making more sustainable communities across the District as a whole.</p>	
<u>Members of the Public and community groups</u>	
<p>Numerous comments referenced that the village had been subject to significant growth and didn't think that it was fair for this to continue. Some comments opined that the housing target was now advisory and need not be followed or that it was based on outdated population data. A number questioned whether the level of consultation with the community had been appropriate and/or whether such feedback had been considered/reflected as part of the production of the Local Plan.</p>	
<p>Comments of objection to the allocation generally favoured its removal. Reasons for this included:</p>	
<ul style="list-style-type: none"> <li>- Inability of the village to cope with additional development due to pressure on infrastructure/services, coupled with recent large scale expansion.</li> <li>- That there had been a lack of discussion with infrastructure providers (e.g. health)</li> <li>- Development should be promoted on brownfield sites.</li> <li>- Concerns about flood risk.</li> <li>- Safety concerns regarding the unmanned railway crossing.</li> <li>- Development would cause landscape harm and affect character of the village.</li> <li>- Lack of evidence provided by the site promoter on matters (e.g. biodiversity net gain).</li> <li>- There is uncertainty with regards to delivery timelines (e.g. water neutrality)</li> <li>- The land has underwater water infrastructure.</li> <li>- The A272 is not a natural boundary and development would continue to spread beyond it.</li> <li>- It lacks accessibility to open space/green fields by foot and would prevent access for existing residents.</li> <li>- There is limited public transport infrastructure, particularly buses.</li> <li>- Parking is a problem that will be exacerbated.</li> <li>- Development would lead to additional pollution.</li> </ul>	

- Development would not address needs of the older population.
- The site could deliver more development if planned appropriately.
- The allocation doesn't reflect environmental harm on the site or the wider area (e.g. The Mens).
- An ambulance response post would not benefit the community and other facilities are unlikely to benefit existing residents.

A number of those objecting to East of Billingshurst indicated a preference to replace the allocation with land West of Billingshurst. Reasons for this included that, in their view, West of Billingshurst:

- Was more sustainable.
- Had better access to the road network.
- Was in keeping with the community view.
- Would deliver more benefits to residents (sporting/recreation facilities, community facilities, retail provision, etc.).
- Was incorrectly assessed/didn't fairly reflect the merits of the relative sites or the offer by the site promoters.
- Could deliver more development than the East of Billingshurst site.
- Development would be contained and would not spread westwards due to the provision of a Country Park.
- Would deliver greater biodiversity net gains.
- The legally binding commitment to sports/leisure facilities had not been accurately detailed.

Comments were made on particular policy requirements and that further information was needed. This included:

- A higher proportion of social housing should be required.
- Biodiversity Net Gain requirements should be higher.
- Full archaeological, ecological and viability (including the cost of a railway footbridge) work was needed.
- A traffic impact assessment should be undertaken.
- Details about phasing and delivery of infrastructure (health, education, wastewater treatment etc.) should be set out.
- Station car parking should be placed on the southern side of the tracks, with a connection across the tracks for northbound travellers.
- Access to Broomfield Drive and Brookers Road should be pedestrian/cycle only.
- A footprint over the railway is needed.
- There should be a requirement for the provision of sustainable sources of energy.
- The policy should protect existing trees/hedgerows.
- The developers should be required to exceed minimum building standards to futureproof the development as the climate changes.
- Traffic reduction/public realm improvements should be provided on the high street.
- Improvements to active travel routes should be made.

#### Parish Council

Billingshurst Parish Council sought the removal of the allocation, to be replaced by West of Billingshurst. They considered their views of those of the local community had been ignored and the significant engagement by the promoters of the West of Billingshurst downplayed and dismissed by HDC. They highlighted their signed legal agreement with the landowner and promoters of the West of Billingshurst site, which they viewed had not been properly considered.

They commented that the tests of soundness had been failed:

- The policy is not Justified –HDC has selected the wrong site using assessments that are fundamentally flawed (the examples presented include incorrect site boundary, presence



of a legal agreement with the West site, differences in the assessment of the East and West sites regarding flooding/ drainage, climate/ renewables/ energy efficiency, housing, education, transport, employment community engagement, deliverability, and viability).

- The policy is not Effective – The policy’s supporting text make clear the provision of a footpath railway bridge or underpass is unresolved and there is no statement of common ground in place with Network Rail. There is no agreed solution that has been costed, land secured, designed or programmed. The policies map does include an area for the landing of the bridge crossing south of the railway. These issues raise significant doubts about deliverability of the entire urban extension to the East; and
- The policy is not Consistent with National Policy – The allocation is inconsistent with the NPPF paragraphs 60, 63, 74, 96, and 135 because by selecting the East site over the West it will:
  - Fail to meet the NPPF’s overall aim to meet as much of the area’s identified housing needs as possible. The East site will deliver less of the identified need and given the doubts over deliverability and viability may result in less affordable housing for the community.
  - The East site will deliver fewer services, or a tenure mix and leisure facilities that would create a sustainable community
  - The East site will deliver less diverse development that does not meet all sectors of the community, including care and the elderly, and Gypsies and Travellers.
  - The policy fails to provide realistic assessment of the likely rates of delivery due to the implications of Network Rail’s objection. The lack of solution for the Daux footpath level crossing fails to secure a safe and accessible development.
  - The West site significantly outperforms the East in terms of optimising the potential to include green and public spaces.

#### Developers and Agents

A number proposing other sites in Billingshurst felt that their site should be allocated in addition to/instead of the proposed allocation. This included smaller sites and those adjoining the East of Billingshurst. One comment received questioned the viability of the site as it had not accounted for access payments to link/cross land within Amblehurst Green.

The site promoters for West of Billingshurst considered their site should be allocated as a strategic allocation, highlighting what they considered to be flaws in the site selection process and assessment of reasonable alternatives (including an overreliance on the 2021 Sustainability Appraisal). The considered a re-appraisal, with appropriate weight given to community support, would reveal the West Billingshurst option as a justified appropriate strategy.

- The promoters also considered that the Council has failed to reflect the much larger red line extent and the more comprehensive single proposal submitted in July 2021 and outline an agreement has been signed to secure control of the land, which enables the site to offer a multi-million-pound leisure hub and associated leisure and community facilities at its heart, including the transfer of ownership and commuted sums to maintain a completed country park to the Parish Council.
- Stated that the Council has used an out-of-date base OS base map in the site assessment report which does not show recent development west of the A29 nor east of Stane Street.
- Question the ability for the East of Billingshurst site to deliver a bridge over the railway raises significant questions and therefore the deliverability of the proposed allocation, (eg in terms of viability), when compared with the west. Also critique the provision of affordable housing, Gypsies and Travellers and net zero at the east of Billingshurst location. State that the West would deliver against these objectives and a wide range of other benefits.

- The West Billingshurst site was one of the shortlisted potential allocations in the Regulation 18 Local Plan. The West Billingshurst site would deliver an additional 350 homes compared with development in the East.

#### Statutory Consultees

Natural England commented that the site is within the core sustenance zone of the Mens Special Area of Conservation (SAC), currently greenfield and any development proposals should be habitats-led and retain and enhance linear habitat features to avoid impacts to habitats which are functionally-linked to the Mens SAC, Ebernoe Common SAC. The explained that the site contains priority habitats and ecological networks and suggested wording amendments to reflect these points.

Southern Water requested an additional policy to align with the delivery of sewerage infrastructure.

West Sussex County Council considered that in order to ensure that adequate facilities are provided for non-private car users, HDC should add an additional criterion to improve shared/public transport services. They also wanted to ensure regular monitoring of the effectiveness of site travel plans and the development's trip generation.

### **Observation – Strategic Policy HA4**

<b>Number of Comments</b>	<b>2</b>
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#### **Summary of Comments**

#### Statutory Consultees

National Highways commented that requirements for the site should make direct reference to Circular 01/22 and the Vision and Validate / Monitor and Manage requirements they will need to comply with. They also commented that the over-arching Travel Plan and Construction Management Plan (including Construction Logistics) will need to be approved in writing by National Highways in addition to the LPA and LHA.

Surrey County Council noted that the site was sufficiently located away from mineral and waste management interests in Surrey so as to not prejudice their continued and/or future operation.

### **Support – Strategic Policy HA4**

<b>Number of Comments</b>	<b>5</b>
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#### **Summary of Comments**

#### Members of the Public and community groups

Supportive comments included:

- The site is the most suitable in Billingshurst, with the west and north including ancient field patterns, biodiverse hedgerows and ancient woodlands.
- The allocation would lead to less development than at West of Billingshurst, having a lesser impact on infrastructure and services.
- The provision of affordable homes, zero carbon development and biodiversity net gain were welcomed.
- Billingshurst was a sustainable location as it was near Horsham town.

#### Developers and Agents

Bellway Homes and Crest Nicholson, the site promoters, support the principle of the allocation. They consider the site forms a logical extension, and the most appropriate opportunity and sustainable greenfield site in the Local Plan consultation. They expressed that they are ready to

progress a planning application and can deliver homes quickly early in the plan period, as well as the primary school, open space and flood mitigation measures. They provided transport and ecology evidence has to support their proposal.

They supported criteria:

- Criterion 1: (but indicated they could deliver accommodate approximately 700 homes).
- Criteria 2.b) to 2.d), and 2.f)
- Criterion 3 (except 3.b) the requirement for a Landscape Visual Impact Appraisal)
- Criteria 4.b) and 4.c) and all of Criterion 6
- 

Despite the above, they felt that the policy was currently unsound because it does not reflect the supporting evidence base. They requested amendments to the policies map (to match that submitted and a number of the criteria in the policy. The following amendments are sought:

- Criterion 2, Opening paragraph:
  - Removal of the reference to a design code
  - Figure 9 is unclear in terms of weight to be attached it and is therefore unnecessary and ineffective (and should be removed)
  - 2. A): The policy should refer to around 700 homes, which is the figure now being promoted.
  - The need to provide C2 Use Class provision does not appear to be informed by any of the evidence base and should be removed.
- 2.e): The promotion currently exceeds the standards set in the formal Playing Pitch Strategy and Open Space, Sport & Recreation Review 2021. CIL receipts will help contribute to existing leisure, sport and open space facilities. The requirement to provide additional informal space provision is unclear, any additional requirement must be tested appropriately through the viability assessment. For such reasons, they request that flexibility be provided in the policy to avoid conflict with the viability and delivery of the housing and other community benefits.
- Criterion 4, opening paragraph is inconsistent with national policy and only 10% BNG should be required.
- Criterion 5: is not consistent with national policy and therefore unsound as there is no expectation for plan-makers to set local energy efficiency standards for buildings that go beyond building regulations.

Statutory Consultees

Network Rail support the request for comprehensive masterplan with details concerning phasing to be agreed and request to be part of process. They supported 2f) but queried criterion 6 relating to the station car park. They support para 6f) regarding Daux level crossing and mitigation but suggest the inclusion at the end to read ‘and facilitate the closure of the level crossing’. They commented that a footbridge is necessary to remove the safety risk. During phasing of the development, a condition limiting commencement of development is required until the crossing is closed and the alternative crossing is provided.

## Strategic Policy HA5: Ashington

<b>Object – Strategic Policy HA5</b>	
<b>Number of Comments</b>	6
<b>Summary of Comments</b>	
<u>Member of Parliament</u>	
Andrew Griffith (MP, Arundel and South Downs) objected, commenting that the Ashington Neighbourhood Plan was made in 2021 and allocates 225 dwellings which is appropriate level of	

development for the village of this size and further growth is not supported. It was also commented that the local school is at capacity and cannot support additional growth.

Members of the Public and community groups

A comment received cited the additional growth will cause greater air pollution and increase road congestion in the area.

Parish Councils

Ashington Parish Council were of the view that as an allocation in the Neighbourhood Plan would deliver more than identified in the Plan, development on Mousdell Close should be reduced accordingly. They also commented that the village lacks appropriate infrastructure to accommodate the additional growth with concerns over parking, traffic, no adequate employment provision in the village, no surgery provision in the village and capacity at the local primary school.

Thakeham Parish Council objected as it considers the proposed allocation HA6 would bring about coalescence of neighbourhood settlements and is contrary with Policy 15 of the HDLP.

Developers and Agents

The site promoter for a site in the Neighbourhood Plan felt that the allocation should be referenced in the Local Plan for a greater amount of housing (180 homes as opposed to 150 homes).

Another site promoter felt that another set of sites (known as the northern cluster) should be allocated for 400-500 homes to meet needs in the district and elsewhere.

**Support – Policy HA5**

<b>Number of Comments</b>	2
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**Summary of Comments**

Developers and Agents

The site promoter wrote in support of the allocation.

## Strategic Policy HA6: Barns Green

### BGR1: Land South of Smugglers Lane and BGR2: Land South of Muntham Drive

**Object – Policy HA6 BGR1 & BGR2**

<b>Number of Comments</b>	20
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**Summary of Comments**

Members of the Public and community groups

A number of objections jointly commented on BGR1 and BG2. Such comments included:

- The sites are located outside of the settlement boundary
- The allocations undermines the Itchingfield Neighbourhood Plan
- Local infrastructure cannot support including dealing with waste-water arising from increased development.
- Local roads would not be able to cope with increased traffic particularly around the local school.
- The allocations are not consistent with SP3 (Settlement Expansion)

- The development would negatively change the character of the village.
- The allocations would increase flood risk with increased run off.
- Local heritage assets would be harmed.
- Lack of green space provision.
- The proposed growth is disproportionate to its status in the hierarchy.
- Insufficient consultation with local communities, contrary to HDC's Statement of Community Involvement.
- The Local Plan does not give regards to the recent approval at Sumner Ponds. The village has taken too much.
- New housing should supply indoor places for young people.
- The policy should be amended to increase protections to ancient woodland and veteran trees

Parish Council

Itchingfield Parish Council commented that:

- the sites were on greenfield land, which was not supported by the community and goes against the Neighbourhood Plan where housing needs have already been met. The proposed allocations lacked support during the NP preparation process.
- There had been no communication between HDC and IPC.
- Would harm the landscape, lose grazing land and destroy the character of the village.
- Loss of parking for community events (such as the Barns Green Half Marathon).
- Access would be poor and affect existing traffic.
- SA344 (Land rear of Two Mile Ash Road, Barns Green) would be preferred.
- Would adversely impacted on listed dwellings.

Statutory Consultees

Natural England commented that the impact on ancient woodland should be enhanced.

**Support – Policy HA6 BGR1 & BGR2**

**Number of Comments**

1

**Summary of Comments**

Developers and Agents

Support was provided by the site promoter, who explained that it can be brought forward in line with the requirements set out in the policy.

**BGR3: Land at The Old School**

**Object – Policy HA6 BGR3 The Old School**

**Number of Comments**

5

**Summary of Comments**

Members of the Public and community groups

Reasons for objecting included:

- The site, in combination with other sites in the parish, would lead to overdevelopment
- The allocation of BGR3 is not supported because there are no services in this location and Barnes Green is located over mile away. There are no bus services. The development of the Old School would ruin the hamlet of Itchingfield.
- New housing should supply indoor places for young people.

<b>Support – Policy HA6 BGR3 The Old School</b>	
<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Comments were made in support for the redevelopment of this former school site. A comment received was also of the view that the development would be sufficient to meet the needs of the parish.	
<u>Developers and Agents</u>	
The site promoter was supportive of the allocation. They made clear that they would work on an application to accord with policy and that the site would benefit from a bespoke water neutrality solution, enabling it to come forward within 1-5 years.	

## Strategic Policy HA7: Broadbridge Heath

<b>Support - Policy HA7</b>	
<b>Number of Comments</b>	<b>9</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Reasons for objecting included:	
<ul style="list-style-type: none"> <li>- Development opportunities are restricted within Broadbridge Heath</li> <li>- Support is not given to the loss of greenfield land and the proposal is considered to be over development of the site.</li> </ul>	
<u>Parish Councils</u>	
Slinfold Parish Council objected to the policy and made the following comments:	
<ul style="list-style-type: none"> <li>- The site is sited with Slinfold Parish and numbers should be attributed to Slinfold’s housing target.</li> <li>- The policy criterion for “Broadbridge Heath Opportunity Area” (or “Broadbridge Heath Quadrant”) is required to be met in full as set out in the draft Plan. Development requirements set by policy should not be diluted.</li> <li>- The proposed development would see the erosion of the gap between Broadbridge Heath and Slinfold village and request wording amendments to the policy to reinforce this point.</li> <li>- Infrastructure should be upgraded if it is required in order to support growth and new development. For example, the pumping station at Newbridge.</li> <li>- Development should not be allowed to drain to the foul sewer; PV installations to be a requirement on all new development.</li> <li>- Improve broadband connectivity in rural areas for residents and local businesses.</li> </ul>	
Broadbridge Heath Parish Council objected to HA7 on the following grounds:	
<ul style="list-style-type: none"> <li>- “Broadbridge Heath Opportunity Area” (or “Broadbridge Heath Quadrant”) is required to adhere in full the planning criteria and conditions as set out in the draft Plan.</li> <li>- The proposed allocation of BRH1 is considered to be over-development, on a green field site, outside of the BUAB and outside of the parish boundary of Broadbridge Heath, this location falling within the parish of Slinfold.</li> <li>- With the development area falling within Slinfold Parish, the BH parish boundary should be changed to include the development area so CIL receipts are directed to Broadbridge Heath Parish Council instead of Slinfold Parish.</li> </ul>	

- The Parish Council considers the mitigation measures will not yield the necessary water efficiencies required. Proposed measures including flow reducing showers, taps and low water usage white goods could be removed and replaced which would negate any water savings.

Developers and Agents

The site promoter for land north of Lower Broadbridge Farm, sought allocation for their site in addition to the proposed allocation to ensure which would assist with meeting housing requirements. They were of the view that the site was suitable, available and achievable.

Statutory Consultees

Southern Water requested an additional policy to align with the delivery of sewerage infrastructure.

The Environment Agency felt point d) could be clearer in regard to housing being steered to the lowest flood risk areas in accordance with the sequential approach (as per paragraph 23 of the Planning Practice Guidance for Flood risk and coastal change) and suggested wording to assist.

Network Rail explained that they identified improvements required at Horsham rail station and the proximity of BRH1 would justify requesting a financial contribution be secured to help to fund these improvements.

No specific observations or supportive comments were recorded.

## Strategic Policy HA8: Cowfold

<b>Object – Policy HA8 CW1 &amp; CW2</b>	
<b>Number of Comments</b>	<b>7</b>
<b>Summary of Comments</b>	
<p><u>Members of the Public and community groups</u>          Specific comments for objecting to CW2 included:</p> <ul style="list-style-type: none"> <li>- Traffic congestion and air pollution.</li> <li>- Accident rate arising from increase traffic volumes and ‘blind bends’ on the A272 especially for pedestrians.</li> <li>- Development will contribute towards possible increased flood risk with localised flooding already occurring</li> <li>- Loss of wildlife and ecology onsite and the wider locality. Loss of valued field hedgerows and greenfields.</li> <li>- Inadequate local infrastructure to support further growth.</li> <li>- No legal access to the site</li> <li>- Water quality restrictions</li> <li>- New housing should supply places for young people.</li> </ul>	
<p><u>Parish Council</u>          Shermanbury Parish Council objected to Policy HA8 CW1 and CW2 on grounds of air quality and congestion on the local road network accompanied by congestion arising from the development adding to the existing trip generation from local schools and area of employment every morning and the impact of proposed development on AQMA at Cowfold. Residents of Shermanbury would be negatively impacted by the implementation of CW1 and CW2.</p>	
<u>Developers and Agents</u>	

A site suggesting that further allocations should be made in Cowfold – such as a site that they control.

Statutory Consultees

Natural England commented that there was no reference to priority habitats in the current policy wording and suggested a new policy criterion to address this.

**Support – Policy HA8 CW1 & CW2**

**Number of Comments** | 2

**Summary of Comments**

Developers and Agents

The site promoter for CW1 submitted support for the allocation of the site.

## Strategic Policy HA9: Henfield

**Object - Policy HA9**

**Number of Comments** | 71

**Summary of Comments**

Member of Parliament

Andrew Griffiths MP objected on the following grounds:

- The site was previously assessed and dismissed in the preparation of the Henfield Neighbourhood Plan because it is undeliverable and is in of the most constrained parts of the village.
- The site was subject to two previous applications (and appeals) and was rejected.
- Located outside the existing settlement boundary.
- The site would increase local traffic where the only two routes to the main road via Church Road and Nep Town Road are in the central Henfield Conservation Area, are narrow and restricted by parked vehicles, and should be protected from extra vehicles and congestion.
- Undermines the Downslink and tranquillity.
- Localised flooding is cited around Hollands Lane.

Members of the Public and community groups

Campaign to Protect Rural Henfield commented that:

- The allocation is contrary to legislation relating to heritage, biodiversity, Landscape character.
- The policy undermines the existing neighbourhood plan and the community has not been consulted on site allocations.
- The Council has not met its own Statement of Community Involvement and failed to effectively consult with local communities.
- Development should be phased, with existing neighbourhood plan allocations in the first phase, to allow communities to bring forward other allocations for the latter phases.

As well as making comments similar to the above, a number of individuals identified objected to the allocation on a number of grounds including:

- Increased congestion including putting additional traffic on the congested high street, with concerns that this could also harm Henfield Conservation Area. A lack of a proper highways and traffic assessment evidence for the site to justify its inclusion in the plan was also cited.
- Poor public transport and pedestrian/cycle links from West End Lane.



- Poor access and connectivity to the village centre and major services – surgery, school are at least one mile away. Infrastructure is needed before development should come forward.
- The allocation would undermine the rural landscape character and setting of the village, with adverse impact on views of the South Downs.
- The site conflicts with the Neighbourhood Plan and was ranked 28 out of 32 sites in the site assessment process, so is not supported by the community.
- Significant harm to the nearby Listed Building (Dears Farmhouse) caused by the proposal.
- Loss of biodiversity and wildlife. The site has not been subject to a HRA appraisal and is unsound. The allocation would undermine the integrity of key wildlife corridors – Downslink/River Adur
- The area is water stressed and affected by water neutrality.

#### Parish Councils

Henfield Parish Council objected to the allocation on the following grounds:

- It undermines the Henfield Neighbourhood Plan as the site was rejected by local neighbourhood planners. The site is also located outside the existing settlement boundary.
- The location is considered to be unsustainable with shops and local services located over 1 mile away. Lack of connectivity and investment in local infrastructure.
- Required to support growth with accompanying infrastructure including waste water infrastructure which is at capacity and can cause issues in the village during period of heavy rainfall.
- Undermines biodiversity and BNG requirements. The allocation would also undermine the integrity of key wildlife corridors – Downslink/River Adur. The site is part of the Weald to Waves initiative nature corridor.
- The site has been empty for a period of time and has since ‘rewilded’ and should be exempted from development.

Shermanbury Parish Council stated that the allocation is a departure from its basic principles by including sites not included in the Henfield Neighbourhood Plan.

#### Developers and Agents

A comment received said that further sites should be allocated in the parish, such as one in their control, to meet needs.

#### Statutory Consultees

Southern Water requested an additional policy to align with the delivery of sewerage infrastructure.

### **Support – Policy HA9 HNF1**

#### **Number of Comments**

1

#### **Summary of Comments**

#### Developers and Agents

The site promoter supported the allocation. They also noted site they had submitted an application to maximise the effective use of the site to bring forward up to 82 dwellings whilst ensuring policy compliance.

# Strategic Policy HA10: Horsham

## HOR1: Land at Hornbrook Farm

<b>Object – HA10: HOR1</b>	
<b>Number of Comments</b>	<b>15</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Comments received included:	
<ul style="list-style-type: none"><li>- The site boundaries should be redrawn to exclude ancient woodland and the policy should refer to ancient woodland.</li><li>- a full ecological survey should be conducted and a Biodiversity Action Plan created for the endangered species who utilise the site.</li><li>- To build on this site would interrupt the nature corridor between Denne Hill and the High Weald AONB – development would adversely impact upon the setting of the AONB.</li><li>- Development would cause traffic and hazard to pedestrians and flooding on Kerves Lane.</li><li>- There was a legally binding agreement that the site would not be built upon.</li><li>- Development at the site would destroy the rural entrance to Horsham</li><li>- New housing should supply places for young people.</li></ul>	
<u>Developers and Agents</u>	
Though supporting the allocation of the site, the site promoter suggested the allocations should state ‘at least’ 100 homes and opined that the affordable housing requirement should be set at 35%. Another site promoter suggested that they regarded a site at Athelstan Way to be superior to the proposed allocation.	
<u>Statutory Consultees</u>	
Natural England expressed concern that the impacts to the High Weald National Landscape (formerly Area of Outstanding Natural Beauty) have not been fully assessed. The High Weald AONB Unit were concerned that criterion b) is primarily concerned with views, which does not fully address the potential impacts on the adjacent AONB and suggested re-wording.	
Southern Water requested an additional policy to align with the delivery of sewerage infrastructure. They also explained that easements would also be required for any underground infrastructure, which may affect the site layout or require diversion.	

<b>Observation – HA10: HOR1</b>	
<b>Number of Comments</b>	<b>5</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
It was commented that as part of the Local Plan, the settlement boundary should be realigned to include the proposed HOR1 allocation. It was also suggested that additional development could be accommodated in Horsham in addition to this site.	
<u>Statutory Consultees</u>	
Network Rail felt development of the allocation would justify a financial contribution be secured to help to fund improvements at Horsham rail station.	

<b>Support – HA10: HOR1</b>	
<b>Number of Comments</b>	<b>5</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
One comment was received expressing support for the allocation.	
<u>Parish Council</u>	
Forest Neighbourhood Council supported the criteria, in particular d) and f), to ensure the Riverside Walks runs through at a suitable site.	
<u>Developers and Agents</u>	
The site promoters indicated that they supported the allocation and explained that they were progressing a planning application to accord with the emerging policy.	

## **HOR2: Land at Mercer Road**

<b>Object – HA10: HOR2</b>	
<b>Number of Comments</b>	<b>9</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Comments received included:	
<ul style="list-style-type: none"> <li>- New housing should supply places for young people.</li> <li>- The policy should be modified to provide active travel links between Horsham and Warnham, including a safe crossing of the A24.</li> <li>- The policy wording should be amended to further protect ancient woodland.</li> <li>- Development would reduce the gap between Crawley and Horsham</li> <li>- Additional parking at the station is redundant as the service is slow, not used by commuters and is not located near the village centre.</li> </ul>	
<u>Parish Council</u>	
North Horsham Parish Council questioned the transparency and clarity on the number of homes coming forward through HOR2 and whether intensification or new sites and location of homes North of Horsham is required. It was opined that this allocation together with intensification at North Horsham is making an allocation for an additional 900 homes North of Horsham – a total which is effectively hidden within the detail of the Plan. They also made reference to coalescence between Warnham and Horsham town.	
<u>Developers and Agents</u>	
Those representing the landowner were not of the view that a railway crossing should be funded entirely by the development of 300 homes at HOR2. Any contributions towards infrastructure improvements should be proportionate in their view, recognising that North Horsham would be delivering a far greater amount of development.	
The promoter for North Horsham commented that development would be reliant on the amenities, facilities and highway improvements delivered on their site with no requirement to contribute to them. They commented that a comprehensive approach is required and that a mechanism must be put in place to ensure its appropriate contribution to the local improvement works. They were also of the view that Mercer Road should come forward earlier in the trajectory.	
<u>Statutory Consultees</u>	

Southern Water requested an additional policy to align with the delivery of sewerage infrastructure.

### Observation – HA10: HOR2

<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Statutory Consultees</u> Network Rail felt development of the allocation would justify a financial contribution be secured to help to fund improvements at Horsham rail station.	

### Support – HA10: HOR2

<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> Support for the policy provisions were provided.	
<u>Developers and Agents</u> The site promoter indicated support (except for criterion g) and indicated that their proposal was progressing Riverside Development supports the allocation and Policy HOR2 with the exception of criterion (g). Another comment suggested that Horsham is the most sustainable settlement and could accommodate the allocations as well as more development.	

## Strategic Policy HA11: Lower Beeding

### Object – Policy HA11

<b>Number of Comments</b>	<b>5</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> Comments received included: <ul style="list-style-type: none"><li>- New housing should supply places for young people.</li><li>- The allocations were not compliant with the NPPF</li><li>- The allocation at Glayde Farm differs from that in the Neighbourhood Plan.</li><li>- Concern with the setting and impact on the High Weald AONB</li></ul> An alternative viewpoint expressed that there was a known Housing Needs Register derived figure of 95 dwellings yet with only 43 homes had been allocated in the Parish and that this would lead to a shortfall of affordable housing supply.	
<u>Parish Council</u> Lower Beeding Parish Council objected to Policy LWB1 on grounds of flood risk and that the watercourse alongside the site is a marsh at source and includes wildlife such as newts and frogs.	
<u>Statutory Consultees</u> Natural England considered insufficient regard has given to the impacts to the High Weald AONB in the policy wording and suggested alternative wording to mitigate this impact	

<b>Support – Policy HA11</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
<p>Though supporting the principle of the allocation, a comment was made suggesting that the built-up area boundary for Lower Beeding should be extended to include the allocation of the site LWB1, the site area should increase to match the area defined in the proposal maps, yields should be increased to account for the neighbourhood plan allocation and that landscape requirements on the northern field should be removed.</p>	

## Strategic Policy HA12: Partridge Green

### PG1: Land North of the Rosary

<b>Object – PG1</b>	
<b>Number of Comments</b>	<b>5</b>
<b>Summary of Comments</b>	
<u>Member of Parliament</u>	
<p>Andrew Griffith MP noted that the site was on greenfield land, undermined the neighbourhood plans (both those at West Grinstead and Shermanbury) and that there was no meaningful consultation with the community. He also commented that Southern Water had advised that the local Wastewater Treatment Works does not have sufficient capacity.</p>	
<u>Members of the Public and community groups</u>	
<p>Comments included:</p> <ul style="list-style-type: none"> <li>- The site will be visually intrusive and reduce openness between Partridge Green and Jolesfield and harm their separate identities</li> <li>- There are concerns over pedestrian and road safety as the allocation fails to provide sufficient active travel measures and lacks safe connections with the existing ProW network.</li> <li>- The site is contrary to the Landscape Capacity Assessment, would harm the settlement pattern.</li> </ul>	
<u>Parish Council</u>	
<p>West Grinstead Parish Council objected to all of the Partridge Green allocations as it considers the process undemocratic and undermines the made neighbourhood plan. The Parish Council has produced its own Housing Requirement figure and advocate the implementation of its own housing requirement instead of the allocations imposed on the parish.</p> <p>The Parish Council also objected to the allocation of PG1 citing the allocation would be contrary to landscape guidance from the Landscape Capacity Assessment 2021 and like many locals indicated that the allocation would undermine the 'gap' separation between Jolesfield and Partridge Green.</p> <p>They also commented that the site assessment report conclusion for PG2 cites there is a high-pressure gas pipeline to the west of the site. In their view, a correction is required as there is no high pressure gas pipeline to the west of PG2 and therefore no 150m buffer zone is required. Policy PG2 (i) will require correction and instead should apply to the site PG1.</p>	
<u>Statutory Consultees</u>	

Natural England explained that the site contains deciduous woodland, which is a priority habitat of national importance and should be conserved and enhanced in line with the NPPF paragraph 185. They suggested the policy wording could be strengthened to ensure that development is habitats led.

### Support – PG1

**Number of Comments**

1

#### Summary of Comments

##### Developers and Agents

The site promoter supported the allocation and considered to be suitable, available and achievable within the Local Plan timescales. They stated that site has a bespoke water neutrality scheme, which will ensure its early delivery. However, they considered the policy should be amended to make clear 80 homes was the minimum the site could deliver.

### PG2: Land North of the Rise

#### Object – PG2

**Number of Comments**

4

#### Summary of Comments

##### Member of Parliament

Andrew Griffith MP noted that the site was on greenfield land, undermined the neighbourhood plans (both those at West Grinstead and Shermanbury) and that there was no meaningful consultation with the community. He also commented that Southern Water had advised that the local Wastewater Treatment Works does not have sufficient capacity.

##### Members of the Public and community groups

An objection was raised that due to

- The village isn't attractive to young people
- Lack of active travel and sustainable transport options
- Traffic, pollution and Road safety concerns

##### Parish Council

West Grinstead Parish Council Made similar objections as with other sites (see PG1). In terms of site specific objections they noted the site assessment report conclusion for PG2 cites there is a high-pressure gas pipeline to the west of the site – they believe that this should say east and the policy would therefore require correction.

In their view PG2, together with PG3 would create congestion and greater air pollution for local residents especially around the High Street. The lack of frequency of public transport with the train station located over 10 miles away will create car dependency. Concerns over pedestrian safety as traffic increases particularly when crossing the High Street.

It was also commented that vehicles will have no alternative but to access Littleworth Lane. Travelling south or east will mean eventually joining the High Street. It would be possible to travel north up Littleworth Lane for those wishing to travel north, east or west although the A272 is a very busy road and the uncontrolled junction is extremely difficult and dangerous to negotiate at peak times.

<b>Support – PG2</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
The site promoter fully supported the allocation and noted an outline application had been submitted and refused only on water neutrality grounds.	

### PG3: Land at Dunstans Farm

<b>Object - Policy HA12 – PG3 Dunstans Farm</b>	
<b>Number of Comments</b>	<b>4</b>
<b>Summary of Comments</b>	
<u>Member of Parliament</u>	
In addition to comments relevant to all PG allocations (set out in earlier summaries on Partridge Green) Andrew Griffith MP noted PG3 would	
<ul style="list-style-type: none"> <li>- erode the gap and separation between Partridge Green and Shermanbury.</li> <li>- PG3 would impact negatively on the Grade II listed building Old Priors.</li> <li>- The High Street, connecting each end of Partridge Green from the A281 to the B2135 and onto the A24, has traffic calming infrastructure in place which reduces to a single vehicle passing point. Additional housing of the level proposed would exacerbate the amount of traffic on the High Street and see more traffic re-routing through Littleworth.</li> </ul>	
<u>Members of the Public and community groups</u>	
A comment was made that private vehicle ownership will be very high and in their view it was clear from the plans that access and egress from this site will be via the east end of the High Street as there is no alternative. Vehicles traveling west will have no option but to use the High Street. Vehicles may well have access to Littleworth Lane however for those travelling north the A272 junction is problematic. The allocation is not sound and would create significant congestion, air pollution and concerns over road safety.	
<u>Parish Councils</u>	
West Grinstead Parish Council's objections are set out in the summaries to PG1 and PG2.	
Shermanbury Parish Council strongly objected on the following grounds:	
<ul style="list-style-type: none"> <li>- Coalescence</li> <li>- Urbanising effects and threat to countryside</li> <li>- Impact on highway safety</li> </ul>	

<b>Support – Policy HA12 PG3 Dunstan Farm</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
The site promoter supported the allocation and noted that a previous application had been submitted but refused due to water neutrality issues, which they felt could now be addressed. They advised that the revised indicative development framework plan outlines potential pedestrian and cycle links to the adjacent residential allocation PG2. They also identified that the impact on the nearby listed building had been considered and suggested a wording amendment	

to PG3 to reflect that the need to have regard to the Grade II Listed Building (Old Priors) and its setting to the south

## Strategic Policy HA13: Pulborough

<b>Object – Policy HA13: Highfields, Pulborough</b>	
<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> The need to provide open space was questioned when the site is surrounded by green space, including the National Park. Additionally, they questioned public access to the surrounding green space as it is bisected by roads and the railway, hindering users such as cyclists and children. They suggested modification of the policy was needed to more appropriately respond to the local context, prioritising the provision of safe access to existing green space via the enhancement of the active travel network.	
<u>Statutory Consultees</u> The South Downs National Park Authority (SDNPA) requested a wording amendment to ensure the site is landscape led, and development layout and capacity is designed to avoid adverse impacts on the National Park and its setting. Natural England suggested similar wording. The SDNPA also commented that the site has a role in the gap and transition between settlement to the north and south of the railway line and retaining and enhancing site boundaries would assist in minimising impacts and maintaining the gap and transition.	

<b>Observation – Policy HA13 Land at Highlands, Pulborough</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Statutory Consultees</u> Network Rail were of the view that policy should request a financial contribution be secured towards the identified improvements to Pulborough station car park and that consultation with Network Rail would be necessary as part of any development proposal in this location.	

<b>Support – Policy HA13 Land at Highfield</b>	
<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> A comment received supported the principle of development and that development was proportionate to village.	
<u>Developers and Agents</u> The site promoter supported the allocation but felt that criterion 2 is too prescriptive. Another site promoter supported the allocation but felt a neighbouring site should also be allocated to assist with meeting needs.	



## Strategic Policy HA14: Rudgwick and Bucks Green

<b>Object – Policy HA14 Rudgwick and Bucks Green</b>	
<b>Number of Comments</b>	<b>9</b>
<b>Summary of Comments</b>	
<u>Members of the Public and Community Groups</u>	
Some of the representations expressed concerns about both allocations or did not clarify which specific site they were concerned with. Such comments included:	
<ul style="list-style-type: none"><li>- The area was assessed as not developable in 2018</li><li>- The allocations do not take account of nearby development in adjacent areas</li><li>- There is insufficient infrastructure to accommodate increased population – difficult to get GP and Dentist appointments - development will therefore impact on existing residents</li><li>- No consideration has been given to traffic and air quality caused by new development – and traffic is already excessive with high speeds</li><li>- No consideration of flooding either on site or causing run off to neighbouring properties</li><li>- There are sewage and water stress problems in the area</li><li>- There has been no train service since 1965 and residents commute by car</li><li>- Housing Targets for Rudgwick have already been met</li><li>- Development will impact on the character of the village – including the historic environment</li></ul>	
Specific comments on RD1 were:	
<ul style="list-style-type: none"><li>- There would be adverse impacts on Listed Buildings – The Old Cottage and Snoxall</li><li>- Development on the southern part of the site would have a larger visual impact than on the northern part as it is not overlooked by as many properties</li><li>- Loss of agricultural land when other sites are available</li><li>- Disruption to wildlife</li><li>- Views from a footpath would be negatively affected</li></ul>	
Specific comments on RD2 were:	
<ul style="list-style-type: none"><li>- Access into the site would be dangerous, occurring at a bend that reduces visibility</li></ul>	
<u>Developers and Agents</u>	
Multiple site promoters for other sites in Rudgwick were of the view that the proposed allocations were not appropriate or additional allocations were needed. Reasons given for this included:	
<ul style="list-style-type: none"><li>- The sites aren't sustainably located</li><li>- The Landscape Capacity Study found RD1 to have limited capacity for development</li><li>- Rudgwick is of sufficient size to accommodate additional sites</li><li>- Whilst supporting the principle of development on RD1 to bring forward new housing, the promoters for the site did not support the wording of the policy. They were of the view that the site could accommodate 105 homes (rather than 60 as indicated in the policy) and that changes should be made to the proposal map to accommodate this increase.</li></ul>	

<b>Observation – Policy HA14 Rudgwick and Bucks Green</b>	
<b>Number of Comments</b>	<b>2</b>
<b>Summary of Comments</b>	
<u>Member of the public</u> A member of the public suggested minor changes to the supporting text and title of the policy to make reference to Cox Green and to correct a sentence so that it referred to Bucks Green rather than Rudgwick.	
<u>Statutory Consultees</u> Waverley Borough Council noted the proposed allocations could have an impact on the A281 going northwards into Waverley. They recognised that traffic modelling had taken place which had not identified any issues of a cross-border matter. They requested that any impact from development should be addressed through the policy.	

<b>Support – Policy HA14 Rudgwick and Bucks Green</b>	
<b>Number of Comments</b>	<b>4</b>
<b>Summary of Comments</b>	
<u>Members of the Public and Community Groups</u> Rudgwick Preservation Society supported the allocations and stated that they did so through the Neighbourhood Plan. They indicated strong support for amalgamating the site and providing walking/cycling links between Bucks Green and Rudgwick.	
<u>Parish Council</u> Rudgwick Parish Council supported the allocation but only on the provision of a single access point onto the A281 serving both allocations (ideally with a mini-roundabout that also serves the King George V playing fields).  They were also of the view that the third lane of paragraph 10.149 should state “Bucks Green is a largely linear settlement” and that the title of the policy should be “Rudgwick, Cox Green & Bucks Green”.	
<u>Developers and Agents</u> The site promoter of RG1 was supportive of the principle of the allocation.	

## Strategic Policy HA15: Rusper

### RS1: Land at Rusper Glebe

<b>Object – Policy HA15 – RS1 Rusper Glebe</b>	
<b>Number of Comments</b>	<b>10</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u> Comments included: <ul style="list-style-type: none"> <li>- Rusper and the district had seen large scale growth – the village already is being squeezed by development at North Horsham and Kilnwood Vale</li> <li>- There would be an increase in traffic</li> <li>- The allocation would deviate from the Neighbourhood Plan</li> </ul>	

- Allocation proposed outside of the settlement boundary
- There was limited infrastructure
- No benefit to local residents and new housing should supply places for young people
- Would impact on the Conservation Area, landscape and setting
- Would harm biodiversity

Developers and Agents

Gatwick Airport Limited, while not objecting to the proposal recommended the following amendment to criterion 2 to ensure current and future noise levels are considered as far as this is possible.

Parish Council

Rusper Parish Council objected to RS1 on the following grounds:

- No identified need from Housing Needs Assessment for this allocation – this was considered through the Neighbourhood Plan process. In addition the site is outside the settlement boundary so conflicts with SP3.
- Unsustainable and isolated from Crawley, Dorking and Horsham. Limited bus service and the local primary school is at capacity. Lack of services to accommodate growth (lack of doctors) and poor connectivity
- No services to the site and the provision/connection of mains waste infrastructure would be an issue. The site cannot demonstrate water neutrality.
- The proposal would contribute to a loss of character for the village and is contrary to the Rusper Dark Skies Policy.
- The site will cause significant harm to the local heritage assets and the setting of Rusper Conservation Area.
- Brownfield sites should come first and would be more viable.

Developers and Agents

One site promoter made comments that suggested that additional dwellings could be provided in Rusper including their site.

<b>Observation – Policy HA15 RS1 Rusper Glebe</b>	
<b>Number of Comments</b>	<b>2</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
Gatwick Airport noted that the site lies outside the 60dB contour and so offered no objection and that they would supported the implementation of suitable noise mitigation.	
<u>Statutory Consultees</u>	
Thames Water submitted representations promoting early engagement between them and developers and also confirmed that following desktop assessment that they do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s.	

**RS2: Land north of East Street**

<b>Object – Policy HA15 – RS2 Land North of East Street</b>	
<b>Number of Comments</b>	<b>7</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Comments included:	
<ul style="list-style-type: none"> <li>- New housing should supply places for young people</li> </ul>	

- Lack of infrastructure to service further growth in the village (shops, schools and doctors). The village has expanded a lot in recent years.
- Development at North Horsham (Mowbray) has had a significant impact on local roads causing congestion and creating increased volumes of traffic passing through the village.
- Contrary to the Rusper Dark Skies Policy.
- Lack of services to accommodate growth (lack of doctors, facilities) and poor connectivity locally (no suitable footways) with no daily bus service for the area. The local primary school is at capacity.
- The site will cause significant harm to the local heritage assets and the setting of Rusper CA.
- Better alternative sites to be found in the village. The site is located outside the settlement boundary.
- Local Views from the site will be harmed.
- The site is not water neutral.
- The site allocation undermines the made neighbourhood plan.

Developers and Agents

Gatwick Airport Limited, while not objecting to the proposal recommended the following amendment to criterion 2 to ensure current and future noise levels are considered as far as this is possible.

Parish Council

Rusper Parish Council objected on the following grounds:

- The site is located outside the existing settlement boundary.
- The site was not proposed to the neighbourhood planners so it was not assessed at the time.
- The proposal does not meet Strategic Policy 3: Settlement Expansion. Local housing needs has been met. Development is not contained in a defensible boundary and will impact on local views in the NP.
- The site does not demonstrate water neutrality.

**Observation – Policy HA15 RS2 Land North of East Street**

<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
A comment was made that a development on the site should be modelled on the Gardener’s Green Development.	
<u>Developers and Agents</u>	
Gatwick Airport noted that the site lies outside the 60dB contour and so offered no objection and that they would supported the implementation of suitable noise mitigation.	
<u>Statutory Consultees</u>	
Thames Water submitted representations promoting early engagement between them and developers and also confirmed that following desktop assessment that they do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s.	

<b>Support – Policy RS2 Land North of East Street</b>	
<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
Comments made in support indicated that the site was largely unconstrained, can contribute to meeting housing needs and can be implemented quickly as it was a smaller site. A comment recognised an error that the policy should refer to 32 homes rather than 22 homes.	

## Strategic Policy HA16: Small Dole

<b>Object – Policy HA16</b>	
<b>Number of Comments</b>	<b>76</b>
<b>Summary of Comments</b>	
<u>Member of Parliament</u>	
Andrew Griffith MP (Arundel and South Downs) made the following comments:	
<ul style="list-style-type: none"> <li>- The grade 2 agricultural field proposed for development is in an unsustainable location for development and was firmly rejected in the preparation of the Henfield Neighbourhood Plan.</li> <li>- The Upper Beeding and Small Dole Neighbourhood Plan made provision for development at Oxcroft Farm and resolved not to allocate further sites in Small Dole to take into account sustainability and size of settlements.</li> <li>- The site was previously subject to a planning application which was rejected.</li> <li>- The site impacts on the South Downs National Park.</li> </ul>	
<u>Members of the Public and community groups</u>	
A large volume of comments were received objecting to the allocation. Comments included:	
<ul style="list-style-type: none"> <li>- The site has been assessed and rejected by the Neighbourhood Plan and therefore would undermine the wishes of the community. Sufficient development has been allocated to the village following the allocations made in the respective neighbourhood plans (Henfield and Upper Beeding) and the additional allocation is too much growth.</li> <li>- The site lies outside the settlement boundary and would urbanise the village and does not reflect the settlement pattern of the village.</li> <li>- The village is relatively small with limited services and cannot support additional development without investment in infrastructure.</li> <li>- The proposal will impact negatively on the landscape and settlement character including an adverse impact on the South Downs National Park given the site's close proximity to the boundary of the national park. The allocation would result in loss of dark skies because of light pollution (National Park has a Dark Skies Policy).</li> <li>- The site has been rejected in a previous planning application.</li> <li>- Surface water flooding is a risk in that location and there is inadequate wastewater infrastructure to deal with additional development in the village.</li> <li>- Poor connectivity and lack of public transport and dangerous site access. Unsustainable location which will lead to an increase in car usage on local roads.</li> <li>- Lack of consultation with local residents on potential development sites and contrary to the Council's SCI</li> <li>- Would lead to loss of wildlife and biodiversity.</li> <li>- The Southeast of England is a water stressed area and a borehole will not work because of clay soils found in the area. Water Neutrality is an issue.</li> <li>- HDC should focus on brownfield development instead of releasing greenfield.</li> <li>- Impact on value of properties and create disruption during the construction period.</li> </ul>	

- Lack of capacity at local schools in the area would make the proposal unsustainable.
- Development should be phased with Neighbourhood Plan allocations coming forward in the first phase and further Neighbourhood Plan updates bringing forward development in the latter phases.

**Parish Councils**

Upper Beeding Parish Council and Henfield Parish Council objected on the following grounds:

- The site has been rejected previously by the neighbourhood planners and this allocation undermines the neighbourhood plan
- There was an agreement between the parishes (Henfield and Upper Beeding) to allocate one site at Small Dole which would meet all their future needs.
- Small Dole is a small village with limited facilities and cannot accommodate additional growth on top of the allocation made in the neighbourhood plan.
- Impacts negatively on the setting of the national park.
- Impact on landscape and the character of the village.

Henfield Parish Council also objected on the following grounds:

- Lack of public transport would increase car usage if you wanted to access services.
- Both the neighbourhood plan allocation and the local plan allocation would constitute a 23% increase in the population of the village. This would change the character of the village.
- The site was previously subject to a planning application and rejected.

**Statutory Consultees**

Natural England advised that the application site is within the setting of the South Downs National Park. They suggested policy wording to address potential harm to this landscape.

<b>Support – Policy HA16</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
The site promoter supported the allocation and thought that it was capable of being delivered earlier than the Council expects.	

## Strategic Policy HA17: Steyning

<b>Objection – Policy HA17</b>	
<b>Number of Comments</b>	<b>8</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Comments objecting to the allocation were varied and included:	
<ul style="list-style-type: none"> <li>- Brownfield development should be prioritised.</li> <li>- Development would cause traffic congestion, poor parking and accidents.</li> <li>- The village’s needs should not come forward on a single site.</li> <li>- There was no justification for the site and constraints had not been addressed</li> <li>- Lack of infrastructure and investment in community services. (sewage and waste, schools, health infrastructure is at capacity which cannot accommodate additional growth).</li> <li>- The proposal is considered to be over development for the village.</li> </ul>	

- Infrastructure
- A viable Water Neutrality solution is required.
- A lack of a proper consultation with the community.
- Development should be restricted to 50 dwellings.
- the presence of a lithium battery store or the sewage treatment plant in the proximity of the site has not been addressed and could cause pollution or contamination

Parish Council

Steyning Parish Council commented that the allocation was inconsistent with the NPPF and made the following points:

- The site is bisected away from the main part of town and is separated by A283.
- Steyning does not have the appropriate services to accommodate the additional development.
- Development would conflict with the Council’s aim to reduce carbon and emissions and meet national targets. New builds should also incorporate solar panels and heat pumps as part of the requirement.
- Brownfield sites should be prioritised.
- The proposed development would be contrary to increasing biodiversity net gain when dealing with the loss of greenfield.
- The lack of employment opportunities and active travel measures will encourage use of vehicles leading to increase pollution and congestion.
- New development should comprise smaller units for younger people and for people who want to downsize.

Statutory Consultees

South Downs National Park Authority commented that the site would generate negative effects within the setting of the National Park, in particular regarding landscape character, including settlement pattern, landscape function, and views. They recommended an amendment to be sufficiently clear and specific in regards what is required to address the sensitivity of this site in the setting of the South Downs National Park. Natural England made similar points also requesting that the development be habitat led.

Southern Water requested an additional policy to align with the delivery of sewerage infrastructure. Separation between the site and the Steyning wastewater treatment works was necessary together with an odour assessment.

<b>Observation/Support – Policy</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
The site promoter wrote in support of their site, explained that they had submitted an outline application in September 2021 (impacted by Water Neutrality) and that they considered that the proposal met the relevant policy criteria.	

# Strategic Policy HA18: Storrington

## STO1: Land to the north of Melton Drive/Land South of Northlands Lane

<b>Object – STO1</b>	
<b>Number of Comments</b>	<b>296</b>
<b>Summary of Comments</b>	
<u>Member of Parliament</u> Andrew Griffith MP objected on grounds the allocation encroaches on the green gap, the site has been subject to a previous appeal and rejected by PINS, it undermines the neighbourhood plan, road access and safety is a concern, there is localised flooding, and that the integrity of listed buildings and their setting would be impacted. It was also commented that there is significant overdevelopment in the village and that Storrington is a hub for residents from neighbouring villages who put strain on local services.	
<u>Members of the Public and Community Groups</u> A large number of representors submitted the same or very similar set of comments, with minor variations:  <i>The allocation is not legally compliant (conflict with 17 (5), 19 (2) and 20 (2) of the Planning and Compulsory Purchase Act 2004 and Reg 66(1) of the Planning (Listed Buildings and Conservation Act 1990 and does not comply with Section 9(4) of the Wildlife &amp; Countryside Act 1981), Various reasons are cited – but essentially the site conflicts with other environmental and landscape policies in the plan.</i>  <i>The Local Plan conflicts with the Dec 2023 NPPF paras: 11,14,16, 123, 128 – 129, 180, 195, 201, 206-208, 224 and 227.</i>  <i>The area around site STO1 is prone to localised flooding (off Melton Drive only Fryern Road) which, in turn, leads to severe damage to roads and footpaths. Nor does it take account of the burden that the development would put on the transport links through West Chiltington, (particularly Monkmead Lane) particularly to access the local school.</i>  <i>The proposal conflicts with the Green Gap between Storrington and West Chiltington and will lead to the coalescence of two settlements</i>  <i>The resulting additional traffic movements and artificial lighting would urbanise the countryside and significantly affect important wildlife habitats.</i>  <i>Development on this site is not sustainable: it is on the wrong side of Storrington to offer safe access to the primary school and leisure centre in Storrington.</i>  <i>This is not the location to deliver the lower cost family housing needed by residents.</i>  Other reasons for objection included: <ul style="list-style-type: none"><li>- Development would impact upon listed buildings (including West Wantley House – Grade II*)</li><li>- Lack of consultation in accordance with the Council’s own SCI protocols</li><li>- Site is outside the existing settlement boundary and countryside policies should apply</li><li>- Development should be focused in major towns and cities as stated through the uplift as supported by the NPPF</li><li>- Development should occur on brownfield land or a greater proportion of growth should be on brownfield land</li></ul>	



- Development would be harmful to local landscape character (with some referencing the Landscape Capacity Study's finding)
- Would exacerbate air quality issues in Storrington around the AQMA create health issues contrary to government guidance
- The boundary of Storrington should not be extended
- Development of the site would cause light pollution, impacting upon the South Downs National Park and its Dark Skies policies
- Harm would be caused to local wildlife
- Planning applications for housing development have previously been rejected on the site
- Local transport links are inadequate - Fryern Road has no footways to support safe pedestrian travel
- Concerns around HGV use for construction using roads in West Chiltington
- Fryern Road is narrow and rural in character. It has a number of equestrian properties within close proximity of STO1 and would be in potential conflict with the additional traffic generated by the proposal as could disabled road users
- Insufficient infrastructure provision (e.g. schools are oversubscribed, and no new school places would be delivered)
- HA18 should be revoked because of water neutrality
- STO1 is contrary to the previously approved Neighbourhood Plan (and the South Downs National Park Local Plan). The former has been superseded without the benefit of any public consultation process. It was previously identified/considered as Local Green Space (LGS) in the Neighbourhood Plan and should be considered as a LGS in the Local Plan review.
- STO1 does not comply with the 20-minute neighbourhood

A number of comments suggested that there were flaws with the various assessment documents (HRA/SA/Site Assessment) for reasons including:

- The HRA relies on satellite imagery
- The site is not located in the village where services are located and inability of infrastructure to accommodate additional people
- The SA fails to take into account out of village location, climate change, employment, transport, climate change, footpath network, capacity of the local services/facilities, local heritage assets, countryside protection
- Inadequate consideration of the impact on the setting of only one of the three listed buildings adjacent to the site is considered in the SA
- No account has been had to The Mens SAC and the inclusion has not been made with due regard to the possibility that Barbastelle and Bechstein's Bats will be utilising the site
- ignores the impact of the development on local Traveller communities that are located next to the proposed development and therefore is in breach of the Equality Act 2010.
- doesn't take into account that the location is within a Mineral Safeguarding Zone and therefore is in breach of National Planning Policy Framework 17.

#### Parish Council

Thakeham Parish Council had concerns over the coalescence of villages with Thakeham caused by allocations in Storrington, including STO1. They also noted that residents at STO1 may access sports facilities in Thakeham, the site would be contrary to Strategic Policy 23 and highlighted that the site was not allocated in the relevant Neighbourhood Plan.

Many comments reflected those made by the public, but in Storrington and Sullington Parish Council stated:

- will not be policy compliant with affordable housing provision

- Site is 25-30 minutes walking time away from key facilities, more than double the 20-minute return trip time suggested by the '20 minute neighbourhood' principles. This will increase reliance on private vehicles.
- Fryern Road access is dangerous for pedestrian and cyclist users. Alternative routes are long or difficult and public transport is inadequate
- STO1 crosses through a bluebell wood, copses and field boundaries necessitating substantial tree felling and loss of a contiguous habitat
- STO1 borehole water extraction may harm the Wet Heath area within the Sullington Warren SSSI
- STO1 would undermine the amenity value whole of the footpath network in northern Storrington
- Adverse impacts on public footpaths 2463 (West Chiltington) and 2463-1 (Thakeham) 2442,2448 2463 and 2463-1, in terms of views and amenity for users.
- STO1 would harm existing field boundaries, undermine countryside protection policies, impact on tranquillity, does not meet sustainability requirements, landform and settlement pattern and is undermining the SA objectives
- No assessment of the cumulative impacts of development as people will travel from the rural hinterland to use the facilities at Storrington
- Significant flooding around East Wantley House which may be made worst by the development of STO1
- Water abstraction in STO1, in combination with the 'Land North of Downsview Avenue' development, may be detrimental to the Wet Heath area within the Sullington SSSI – a nationally rare habitat. The allocation should be revoked on grounds of water neutrality as a borehole solution would be inadequate.

Washington Parish Council objected to STO1 as it was considered during the Neighbourhood Plan process and rejected. It is contrary to Policy 9 (green gaps) in the SSWNP and Policy 27 in the HDPF. Sandgate Park should be subject to further protection as a country park and covered through Policy 14 and Policy 28 of the HLP. Existing infrastructure will not be able to cope and is inadequate. West Chiltington Parish Council also objected to erosion of the gap between West Chiltington and Storrington through the allocation of STO1 in the green gap.

#### Developers and Agents

A number of site promoters put the view that their site should also be allocated in preference to or alongside sites that they were promoting in Storrington, in order to meet housing needs. Both site promoters indicated that the site could collectively accommodate a far greater amount of development – ranging from 120 to 160 homes.

Those representing land North of Melton Drive did not consider that the site should forward as a single planning application and that the policy wording should reflect this. They also felt that the policy should be specific as to the minimum amount of dwellings (60) to come forward on land in their control.

#### Statutory Consultees

South Downs National Park Authority and Natural England requested policy wording to make more explicit the need for landscape led development that minimises impacts on the SDNP and its setting.

Southern Water recommended criterion be added to ensure the occupation of development is phase to align with the delivery of sewage infrastructure.

<b>Support – Policy HA18 Policy STO1</b>	
<b>Number of Comments</b>	<b>2</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
Those representing the respective landowners of the site supported the allocation	
Those representing land South of Northlands Lane felt that the policy should reference the need for a 'shadow HRA' and that 'appropriate survey work' should replace the reference in the policy for requiring a wintering bird survey. They also expressed that the policy should require two vehicular access points, including on access from Fryern Lane.	

## STO2: Land at Rock Road

<b>Object – Policy HA18 STO2</b>	
<b>Number of Comments</b>	<b>143</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Reasons for objections varied and included:	
<ul style="list-style-type: none"> <li>- It was previously identified/considered as Local Green Space (LGS) in the Neighbourhood Plan and should be considered as a LGS in the Local Plan review. The site was not identified in the Thakeham NP and should be rejected.</li> <li>- The area is identified as high risk for groundwater pollution. Development should not be allowed which would contribute to this problem.</li> <li>- Storrington has a AQMA designated in the village centre. Further development would lead to increased traffic and exacerbate the deterioration in air quality in the village.</li> <li>- The allocation would undermine the dark skies policy of the national park.</li> <li>- Growth should be focused on urban areas and brownfield site.</li> <li>- Sussex Biodiversity Record Centre have been surveying the site for Dormice activity.</li> <li>- Development will erode the gap between villages to the north (Thakeham).</li> <li>- The site is located outside the existing settlement boundary taking up valuable high grade agricultural land. Countryside protection policies should be applied.</li> <li>- The walking distance from the site to the village centre will be greater than 20 minutes and will encourage people to use their cars and generate a greater strain on local services such as school and health centres.</li> <li>- Local infrastructure (schools/roads/GP) could not cope</li> <li>- Development capacity in the landscape for small to medium scale housing development is limited in that part of the village and would impact negatively on the landscape.</li> <li>- It would cause traffic and road safety issues.</li> <li>- Development will impact on the wet heath of Sullington Warren SSSI and would harm bats, rare glow worms, barn owls, red kites and buzzards which are present on the development site.</li> <li>- Penfold is a Listed Building. Development which impacts on the integrity of the heritage asset should be revoked.</li> <li>- The allocation of STO2 will further urbanise that part of the village. The designation does not have regard to local heritage assets (Penfolds).</li> <li>- The LP fails on Duty to Cooperate by not consulting on STO2 with the local community in Thakeham.</li> <li>- Inconsistent approach to site selection – Land at Rock Road is identified by the LP for allocation but adjacent sites SA469 (Land West of Storrington Road) and SA499 (Land to the rear of Fairlands) are not selected for allocation.</li> </ul>	

- The inclusion of land adjoining Rock Road and Crescent Rise has always been subject to a trust and therefore was not available to be developed or implemented.
- High water table in the location of STO2. During winter localised pooling of water will be difficult to manage should the ground be developed on with impermeable surfaces.

Parish Council

Thakeham Parish Council objected on the following grounds:

- It is a greenfield lies on high grade agricultural land and is contrary to TNP/NP Policy 19 and the protection of food production;
- Loss of biodiversity;
- The site should not come forward because of Water Neutrality;
- The development would lead to greater growth in car usage as public transport is limited and it will encourage people to get in their cars to access employment and services;

Storrington and Sullington Parish (SSPC) objected to STO2 on the following grounds:

- SSPC has not given the village a housing target despite requests from Parish Council;
- Water abstraction will be detrimental to the Wet Heath area within the Sullington SSSI;
- No evidence from the LP will look to address local employment needs and enhance local services and facilities;
- STO2 is further away from shop and services and will increase traffic volumes next to a school. Development will contribute to additional road traffic on the local road network, further exacerbating the air quality in the centre of the village undermining AQMA and the Storrington Air Quality Plan;
- Storrington is a hub for the wider hinterland and there has been no assessment of the cumulative impact of people coming into the village to use local facilities;
- STO2 is regarded as Local Green Space with significant biodiversity, as attested to by local residents. The Sussex Biodiversity Research Centre has been surveying dormice at the STO2 locale since 2019;
- It lies in the parish of Thakeham. This allocation is unacceptable to the parish council because of the inevitable strain it will put on local resources;
- The Council's SA indicate harmful impacts arising from the allocation undermining the sustainability credentials of the site;
- The NPPF advocates development uplift in urban centres and cities. Any uplift should be directed to those areas.

Statutory Consultees

South Downs National Park Authority and Natural England requested policy wording to make more explicit the need for landscape led development that minimises impacts on the SDNP and its setting.

Southern Water recommended criterion be added to ensure the occupation of development is phase to align with the delivery of sewage infrastructure.

<b>Support – Policy HA18 STO2</b>	
<b>Number of Comments</b>	2
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
The site promoter supported the allocation for 55 homes. They suggested that appropriate regard through the DM process will be given to the impact on the nearby listed building Penfolds (Grade II) and to have regard to the setting of the South Downs National Park. They were of the view that both of these matters can be fully addressed through a planning application and can be	

satisfactorily achieved to ensure appropriate regard is given to these designations through a sensitively designed development.

It was explained that the site is relatively unconstrained and will contribute positively to the housing supply by providing site which can be delivered relatively quickly.

## Strategic Policy HA19: Thakeham

<b>Object – Thakeham</b>	
<b>Number of Comments</b>	<b>3</b>
<b>Summary of Comments</b>	
<u>Members of the Public and Community Groups</u>	
Comments were received which thought the sites, alone and in combination with each other could have negative impacts, including:	
<ul style="list-style-type: none"><li>- Inadequate infrastructure to cope with increased population</li><li>- Sprawl across Storrington, Thakeham and West Chiltington</li><li>- Roads are small and not designed to take current levels of traffic or increased traffic</li><li>- The allocations don't take account of recently built/approved development</li><li>- The allocations will add to increased poor air quality.</li></ul>	
<u>Parish Council</u>	
Thakeham Parish Council did not find the inclusion of the allocations in Thakeham to be sound. Reasons included:	
<ul style="list-style-type: none"><li>- The sites were greenfield and potentially prime agricultural land</li><li>- There has been no demonstration that water neutrality issues can be overcome</li><li>- Drains regularly overflow and run off could impact upon neighbouring properties</li><li>- There would be an unacceptable burden upon local infrastructure</li></ul>	
They also made the point that the reference to 'medium village' should read 'smaller village' to correctly reflect the categorisation in the settlement hierarchy. West Chiltington Parish Council supported this view.	
West Chiltington Parish Council also felt that that policy provisions were very weak and that there are many more considerations to consider for further proposed developments in Thakeham.	

<b>Support – HA 19</b>	
<b>Number of Comments</b>	<b>2</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
The site promoter for TH1 Land North of High Bar Lane supported the site's allocation, stating that the site was suitable, available and achievable within Local Plan timescales.	
Though the site promoter for TH2 Land West of Stream House were supportive of the allocation, they were of the view that the site boundary should be redrawn to include land to the east of the site where it is proposed that biodiversity net gain may be delivered. They referred to a live	

planning application for the site where the red line boundary had been extended to include such land and mentioned that making such changes would overcome sequential test issues.

## Strategic Policy HA20: Warnham

<b>Objection – Policy HA20 Land South of Bell Road</b>	
<b>Number of Comments</b>	5
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Comments included:	
<ul style="list-style-type: none"><li>- New housing should supply indoor places for young people.</li><li>- Warnham should be allowed to expand at its historic rate.</li><li>- The connection between Bell Road and A24 is an accident hot spot and the allocation would bring about the possibility of more accidents at this road junction.</li><li>- Infrastructure is not ideal and buses cannot pass another due to parking.</li><li>- Wildlife would be harmed</li><li>- The gradient of the site is prohibitive and development would be visible from the conservation area</li><li>- The site South of Bell Road would be preferable to the chosen site, with better accessibility and safe pavements for connections to Horsham.</li></ul>	
<u>Parish Council</u>	
Warnham Parish Council objected, noting that allocations had already been made through the made Neighbourhood Plan and that there shouldn't be further allocations in the village. They also commented that:	
<ul style="list-style-type: none"><li>- Any development on the site could lead to flooding issues within the village as run off from the site would impact on the centre of the village.</li><li>- Development could undermine nature recovery network and impact negatively on the local environment through increased congestion and air pollution.</li><li>- They had concerns over road safety (A24) and water neutrality.</li><li>- Any new development should not restrict the movement of wildlife and support is given to protecting the environment, recycle rainwater use, support active travel and efficient forms of heat and power generation.</li><li>- There is inadequate infrastructure currently to support new development (school capacity, medical care and community facilities).</li></ul>	

<b>Support – Policy HA20 Land South of Bell Road, Warnham</b>	
<b>Number of Comments</b>	2
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
One comment expressed support for the allocation and suggested that the landowner remains committed to progressing a prompt planning application on the site so that it can deliver houses within the first 5 years of the plan period.	
Another representation supported the allocation but thought that 20 dwellings may be inappropriate and should come forward without a stipulated housing number to enable a wider variety of dwellings to be constructed. They viewed that growth should be in line with the	

historic growth rate in the village with 20 dwellings identified for this site exceeding that historic growth rate.

## Strategic Policy HA21: West Chiltington

### WCH1: Land at Hatches Estate

<b>Object – Policy HA21 – WCH1 Hatches Estate</b>	
<b>Number of Comments</b>	<b>4</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Comments received included the following reasons for their objection:	
<ul style="list-style-type: none"><li>- Consultation on the Reg 18 Local Plan promoted 25 dwellings for West Chiltington, only to increase the quantum of development to 38 dwellings in the Regulation 19 Local Plan. There has been no consultation on the uplift proposed for the village.</li><li>- Increased environmental degradation with greater traffic congestion, increased air pollution and loss of biodiversity.</li><li>- Ignores the Neighbourhood Plan and the work and cost to local people.</li><li>- There is no regular bus service in the area to serve the development.</li><li>- Increased congestion on narrow local roads arising from development.</li><li>- Erosion of the green gap between West Chiltington and Storrington.</li><li>- Lack of infrastructure and services (GPs) to cope with additional growth.</li></ul>	
<u>Parish Council</u>	
Thakeham Parish Council considered the plan unsound on grounds of the lack of information on allocations in West Chiltington Neighbourhood Plan and the Local Plan should subject to further public consultation. They considered the allocation premature and undermined the democratic process. They also objected on the basis of increased coalescence between settlements.	
West Chiltington Parish Council advised that the wording relating to WCH1 relating to the protection of TPOs was too weak and would want to further strengthen the policy to ensure protection of TPOs.	

<b>Support – Policy HA21 – WCH1 Land at Hatches Estate</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
The site promoter indicated support for the allocation. They commented that the site is identified in the emerging West Chiltington Neighbourhood Plan and will be implemented relatively quickly as opposed to large strategic sites, helping meet a local need.	

### WCH2: Land West of Smock Alley

<b>Object – Policy HA21 – WCH2 West of Smock Alley</b>	
<b>Number of Comments</b>	<b>7</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
A number of individuals made similar objections as to WCH1. Specific issues included:	

Increased flood risk especially at Smock Alley

- Allocations with borehole solutions will lead to unsightly infrastructure and cannot demonstrate to have full regulatory conformity with habitat regulations regarding Water Neutrality.
- Local tight narrow roads will not accommodate additional growth.
- Erosion of the gap between West Chiltington and West Chiltington Common increasing coalescence between the two areas.

Parish Council

Thakeham Parish Council considered the plan unsound on grounds of the lack of information on allocations in West Chiltington Neighbourhood Plan and the Local Plan should subject to further public consultation. They considered the allocation premature and undermined the democratic process. They also objected on the basis of increased coalescence between settlements.

Statutory Consultees

Natural England stated WCH2 appears to contain Priority Woodland Habitat and there is no reference to this designation in the policy. They viewed that wording should be added to the policy to make clear that priority habitats would be conserved and enhanced.

<b>Support – Policy HA21 – WCH2 West of Smock Alley</b>	
<b>Number of Comments</b>	<b>1</b>
<b>Summary of Comments</b>	
<u>Developers and Agents</u>	
The site promoter wrote in support of the application and explained that a planning application had been submitted.	
Notwithstanding the overall support for the policy, it was suggested that the wording of each site within Policy HA23 is amended to include the words ‘up to’ before each housing figure.	

**WCH3: East of Hatches House**

<b>Objections – Policy HA21 WCH3 East of Hatches House</b>	
<b>Number of Comments</b>	<b>4</b>
<b>Summary of Comments</b>	
<u>Members of the Public and community groups</u>	
Comments made objecting to these policies raised objections as those for WCH1 and 2.	
<u>Parish Council</u>	
Thakeham Parish Council considered the plan unsound on grounds of the lack of information on allocations in West Chiltington Neighbourhood Plan and the Local Plan should subject to further public consultation. They considered the allocation premature and undermined the democratic process.	
West Chiltington Parish Council strongly objected. They explained that following the 2020 Local Plan consultation, this site was removed from the Draft Regulation 18 Plan but is now allocated in the Regulation 19 LP without any further consultation with the Parish Council or West Chiltington residents. The site is not allocated in the Neighbourhood Plan, and indeed when site	



assessments were conducted as part of the Neighbourhood Planning process it was judged to be the joint-worst potential site in the village for development.

### **Support – Policy HA21 WCH3 East of Hatches House**

#### **Number of Comments**

2

#### **Summary of Comments**

##### Developers and Agents

The site promoter supported the allocation, the allocation of smaller sites and considered the settlement to be a sustainable location. They commented that a planning application is currently under determination.

## **Representation/Plan Making Process**

### **Representation/Plan Making Process**

#### **Number of Comments**

88

#### **Summary of Comments**

##### Members of Parliament/Political Groups

Jeremy Quin, former MP for Horsham, expressed concern with the approach taken to the formulation of the Local Plan, stating that it undermined communities' wishes as set out in Neighbourhood Plans and does not give sufficient weight to local residents' views.

Andrew Griffith MP stated that the Plan had been put together without meaningful community engagement and differed greatly from the Regulation 18 document. He was of the view that Neighbourhood Plans had been ignored.

The Horsham Labour Party made multiple points relating to the consultation and, in particular stated that they were of the view that the Council had not complied fully with the SCI because they had not:

- Assisted anyone who wished to get involved in the planning process.
- Ensured as many people as possible were able to have their say in planning decisions that affect them.

They explained that for those relying on hard copies of the consultation material, supporting documents referred to in the Local Plan were either not available at all or limited in availability due to restricted library opening hours.

##### Members of the Public and Community Groups

A number of comments received stated that there had been no consultation about elements of the Plan (particularly with regards to site allocations), while others suggested that the consultation responses previously submitted had not been reflected in the Regulation 19 document, with comments referencing information from the Consultation Report as evidence of this. A number of views received suggested that the Local Plan did not reflect the views reflected in various made or emerging Neighbourhood Plans.

Some comments mentioned that there was limited coverage of the Local Plan in the media and/or questioned what methods were used to advertise. Other comments suggested that further engagement was needed with some identifying that no exhibitions had been held in

their respective parish/settlement during the plan making process. Some responses indicated that they weren't directly contacted and heard about the representation period through word of mouth. Others pointed to difficulties with the HDC website and searching for information using online search engines.

Some comments referred to limited/incomplete hard copy documentation being available at libraries and/or that library staff had no knowledge of the Local Plan. Some comments were put forward on the documentation being too lengthy and complex – with summaries being suggested as a way to overcome technical information.

Some felt the process was rushed and that the Council ought to have waited for changes to the planning system to occur (such as the release of an updated NPPF) and/or new information or statistics to be made public. Others pointed to confusion between consultation activities undertaken by particular site promoters and activities related to the Local Plan.

Others commented on the consultation process itself, with some describing the system as complex and thought that it impacted on residents expressing their view. Some stated that they needed help to complete the form and others commented that it wasn't possible for those without computers to engage. Others felt the process was not transparent and/or had been overly influenced by developers. Comments were also received on aspects of the form, with some feeling that they shouldn't be forced to answer each question and others being of the view that to respond to some of the questions would involve those responding to have knowledge that they didn't possess.

Some questioned whether the Council had adhered to the Statement of Community Involvement when making the Local Plan or with national policy. Views expressed included:

- Misleading points made in adverts
- Aspects of the Plan had not been made clearly and/or had used jargon
- That the Local Plan had not been shaped by community input and that views had been or would be ignored
- That Councillors' public statements were incorrect/contradictory
- Significant matters (i.e. water neutrality, development in certain parishes) had occurred which meant that further consultation was necessary
- Significant time had occurred since the Regulation 18 document was considered in 2020.

#### Parish Councils

A number of Parish Councils were of the view that the Local Plan did not reflect the views of parishioners and/or their Parish Council indicated through previous responses on the Local Plan and/or through work on their respective Neighbourhood Plans. Some felt that some of the allocations undermined made Neighbourhood Plans and suggested that the Local Plan would affect trust with the District Council/Planning system more generally. Some of the Parish Councils felt that there had been insufficient communication with them on particular site allocations and that the Duty to Cooperate should apply to them.

Though some recognised that the Local Plan covered a period to 2040 (longer than the period covered by respective Neighbourhood Plans), the general feeling expressed was that the Parish Councils should have been allowed to review their Neighbourhood Plans, to include further allocations, rather than the District Council making allocations throughout the District.

## Omitted Sites

Omitted Sites – Housing, Mixed Use, Employment	
Number of Comments	135
<p><b>Summary of Comments</b></p> <p>A number of landowners and site promoters raised objections to the Local Plan’s strategy in respect of housing and employment, in particular Strategic Policy 29 New Employment and Strategic Policy 37 Housing Provision, and considered the following sites should be allocated:</p> <p><b>OMITTED POTENTIAL STRATEGIC ALLOCATIONS:</b></p>	
Site (SHELAA Ref) (Parish)	Proposed Development
<b>Billingshurst</b>	
Land West of Billingshurst (Newbridge Park) (SA744 / SA668 / SA225) (Billingshurst)	<ul style="list-style-type: none"> <li>c. 1,000 homes, including 35% affordable homes within all phases, elderly accommodation and Gypsy and Traveller pitches</li> <li>Primary School (land gifted and contribution, and contribution towards secondary school places)</li> <li>Community centre</li> <li>Leisure hub with associated leisure facilities / improved sports facilities</li> <li>Country park, including allotments and community orchard, and new woodland (30%+ BNG)</li> <li>Retail / employment</li> <li>Extension to existing recycling / waste centre. (representation suggests able to demonstrate water neutrality via bespoke off-setting approach to deliver at least 350 of the 1000 homes they propose)</li> </ul>
Land at Marringdean Road / West of Marringdean Road, Billingshurst <b>(NEW)</b> (Billingshurst)	Housing and supporting infrastructure (site area c.200 acres [80.9ha])
<b>Colgate</b>	
Land to the West of Pease Pottage (Cottesmore Hotel, Golf & Country Club – being promoted as Cottesmore Village) (SA868) (Colgate)	<ul style="list-style-type: none"> <li>Strategic scale residential development (with potential to include specialist accommodation for older people) - no figure given except reference to a 2005 study which indicated c.2,517 dwellings</li> <li>Local centre</li> <li>Primary school</li> <li>Open space, including Sports / play pitches</li> <li>Community food production area (within High Weald National Landscape [formerly AONB]) (adjacent to site being promoted in Mid Sussex – Pease Field for c.150-200 dwellings) (site area c.58ha)</li> </ul>
<b>North Horsham (and Rusper)</b>	
Land North of Horsham ('Mowbray') ('Uplift' to include Cuckmere Farm and intensification of	Additional 560 homes – uplift / intensification within HDPF Masterplan red line boundary.

<p><i>current allocated strategic site in the adopted Local Plan [HDPF], (NEW / HDPF North of Horsham Allocation) (North Horsham)</i></p>	
<p>Land North of Horsham ('Mowbray') - Addition of 3 sites: All are part of the following assessed sites:</p> <ul style="list-style-type: none"> <li>• Land at Graylands and Morris Farm (SA750) (North Horsham)</li> <li>• Land at Huntley Farm (SA751) (North Horsham)</li> <li>• Land at Bensons Farm (SA752) (Rusper)</li> </ul>	<p>c. 380 dwellings in total (total 'site' area 25.87ha, developable area 12.83ha)</p> <p>This comprises 3 proposed extensions to the current allocated strategic site in the adopted Local Plan [HDPF], which has outline permission for 2,750 homes. The three sites would form extensions to the respective phases in the promoter's site titles. The proposed split in development is as follows:</p> <p>Part of "Land at Graylands and Morris Farm (SA750)" (split site): Propose only 10.36ha of the 27.94 ha be allocated (promoter titles the site as 'Land North of Mowbray Sub Phase 3D') for:</p> <ul style="list-style-type: none"> <li>• c.140 dwellings</li> </ul> <p>Part of "Land at Huntley Farm (SA751)": Propose only 4.69ha of the 12.2ha be allocated (promoter titles the site as 'Land North of Mowbray Sub Phase 1B/1D') for:</p> <ul style="list-style-type: none"> <li>• c.60 dwellings</li> </ul> <p>Part of "Land at Bensons Farm (SA752)": Propose only 10.82ha of the 18.77 ha be allocated (promoter titles the site as 'Land North of Mowbray Sub Phase 2C') for:</p> <ul style="list-style-type: none"> <li>• c.180 dwellings</li> </ul>
<b>Warnham</b>	
<p>Land at Kingsfold, Warnham (Brookvale Garden Village) (SA459) (Warnham)</p>	<p>Mixed use to provide:</p> <ul style="list-style-type: none"> <li>• 2,125 dwellings (market and 35% affordable)</li> <li>• 75 extra care homes</li> <li>• c.11ha business / employment campus (5.9ha Business Park and 3.3ha employment hub)</li> <li>• 3FE primary school</li> <li>• New railway station and new railway crossing, possible park and ride</li> <li>• Mobility hub</li> <li>• Medical Centre (subject to demand)</li> <li>• Local Centre / retail services</li> <li>• Country Park - 60ha of open space (41%+BNG)</li> <li>• Sports and play facilities</li> <li>• Solar Farm</li> <li>• Kingsfold A24 relief road</li> </ul>
<b>West Chiltington (and Billingshurst and Pulborough)</b>	

<p>Land at Adversane (Kingswood Village) (SA597) (West Chiltington, Billingshurst, and Pulborough)</p>	<p><i>Not set out in representation, based on HDC's Site Assessment Report and employment commitment (Table 5 of the Local Plan):</i></p> <ul style="list-style-type: none"> <li>• c.2,850 (market and 35% affordable)</li> <li>• 15 Gypsy and Traveller pitches</li> <li>• c.16,850sqm employment (B2, B8, E(g) Use Classes)</li> <li>• Two 2FE Primary Schools (including SEN)</li> <li>• One 6FE Secondary School (including SEN)</li> <li>• Local Centre (including retail, library and community facilities)</li> <li>• Hotel</li> <li>• Open Space (c.34% of site)</li> <li>• Safeguarded land for a future railway station</li> </ul> <p>(Representations suggest the proposal will deliver a water neutrality solution.) (Site area 148.06ha)</p>
<p><b>West Grinstead (and Nuthurst and Shipley)</b></p>	
<p>Land at Buck Barn ('Wealdcross') (SA716) (West Grinstead, Shipley, and Nuthurst)</p>	<ul style="list-style-type: none"> <li>• 3,100 dwellings</li> <li>• Country Park (20ha [49 acres])</li> <li>• Green Bridge over the A24 (potentially)</li> <li>• Open Space including a Village Green, community gardens and allotments</li> <li>• Three education facilities including: <ul style="list-style-type: none"> <li>○ 1 x 1 Form Entry Primary School</li> <li>○ 1 x 2 Form Entry Primary School with Early Years Provision</li> <li>○ 1 x 6 Form Entry Secondary School</li> </ul> </li> <li>• Transport Hubs</li> <li>• 15 x Gypsy and Traveller Pitches</li> <li>• Neighbourhood centre and employment potentially delivering: <ul style="list-style-type: none"> <li>○ c.175,000sqft (16,000sqm) employment space (B2/B8 Use Class)</li> <li>○ c.100,000sqft commercial, business and service space (E Use Class)</li> <li>○ c.29,000sqft community space (F2 Use Class)</li> <li>○ Public House/Hotel (Sui Generis)</li> </ul> </li> </ul> <p>(Representations suggest the proposal will deliver net zero carbon homes and has a water neutrality solution. The Thakeham Homes Limited representation also suggests an uplift to 100 litres per person per day)</p>
<p>Land at Buck Barn ('Wealdcross') (SA716) (West Grinstead, Shipley, and Nuthurst)</p>	<p>Request reconsideration of Buck Barn instead of West of Ifield (Buck Barn is more favourable development (Questions soundness of only including urban extensions)</p>
<p><b><u>MIXED USE / USE OPTIONAL:</u></b></p>	

(Predominantly housing & employment)

(NB: to be read in conjunction with the 'Omitted Potential Strategic Allocations' Table above)

Site (SHELAA Ref) (Parish)	Proposed Development
<b>Billingshurst</b>	
Land at Denver Farm, Okehurst Lane, Billingshurst (SA864 [incl blue boundary]) (Billingshurst)	Any allocation (mixed, res or emp) delivering : <ul style="list-style-type: none"> <li>• 150 dwellings, and/or</li> <li>• 10,000sqm commercial / Industrial floorspace (B2, B8 and E Use Classes)</li> </ul> (site area c.10.5ha)
Land to the West of Billingshurst / Land East of Lordings Road [titled 'Bookhurst South' by promoter](SA409) (Billingshurst)	<ul style="list-style-type: none"> <li>• c.450 homes</li> <li>• Flexible work space</li> <li>• Local centre</li> <li>• Primary School</li> <li>• Country Park</li> </ul> (Indicates that, in collaboration with other promoters of land West of Billingshurst, a larger area they title 'Bookhurst' could deliver 1,750 homes – their scheme focuses on delivering the new community facilities and infrastructure) (site area c.35.3ha)
<b>Horsham and North Horsham</b>	
Land South of Hilliers Garden Centre (SA570) (Horsham - Forest)	Any allocation eg: <ul style="list-style-type: none"> <li>• residential,</li> <li>• mixed use, or</li> <li>• commercial</li> </ul> (site area c.4.7ha).
Land East of Graylands Estate, Horsham (SA363) (North Horsham)	Extension to the East of the Estates existing employment and housing to deliver: <ul style="list-style-type: none"> <li>• c.27 dwellings</li> <li>• c.0.55ha additional employment land</li> </ul>
<b>Pulborough</b>	
Harwoods Land Rover, London Road, Pulborough (SA877) (Pulborough)	Either: housing, mixed use or employment. (Site area 1.1ha - 0.7ha brownfield and 0.4ha woodland) (Draft policy in the Pulborough Neighbourhood Plan allocates site for c.15 dwellings if robustly demonstrated employment generating uses are no longer viable or are being relocated)
<b>Southwater</b>	
Land West of Worthing Road, Tower Hill, Horsham (SA765 and part of SA784 [which also includes SA040 & SA626])(Southwater)	Either: <ul style="list-style-type: none"> <li>• c.150 dwellings, or</li> <li>• c.28,000sqm employment floorspace</li> </ul> (site area c.10.5ha)
<b>Storrington and Sullington</b>	
Chantry Industrial Estate and Chantry Quarry, Storrington (SA544 & SA620) (Storrington and Sullington)	Mixed use to provide: <ul style="list-style-type: none"> <li>• 125 dwellings</li> <li>• 70,000sqft (B2,B8 and ancillary office / E(g) Use Classes)</li> <li>• Quarry – Sand</li> </ul> (two sites comprising a combined site area c.15.8ha)

**HOUSING:**

(Predominantly housing. Including C3 and also C2 Use Class) (NB: to be read in conjunction with the 'Omitted Potential Strategic Allocations' Table above):

Site (SHELAA Ref) (Parish)	Proposed Development
<b>Ashington</b>	
Land North of Rectory Lane and West of Billingshurst Road, Ashington (SA085, SA520, SA524, SA539, SA790,) (Ashington)	c.400-500 homes (To help meet needs including the unmet needs of Coastal West Sussex and Brighton area)  (Reinforced in separate representation from Chichester Diocese and raising that the Ashington Glebe is well situated to deliver 80-100 dwellings potentially singularly or with this wider scheme see below)
Ashington Glebe, Ashington (SA085) (Ashington)	c. 80 – 100 dwellings  (representation suggests either as part of Land North of Rectory Lane [see above], or singularly)
Land West of Ashington School, Ashington (part of SA122 and SA548, SA735) (Ashington)	<ul style="list-style-type: none"> <li>c.180 dwellings</li> <li>Open space, including sport pitches and allotments</li> </ul> (Site allocated for 150 dwellings and community infrastructure in made Ashington Neighbourhood Plan, Policy ASH11) (site area c.14.95ha)
<b>Billingshurst</b>	
Land at Denver Farm, Okehurst Lane, Billingshurst (SA864) (Billingshurst) – see the Mixed Use Table above	
Land to the West of Billingshurst / Land East of Lordings Road (SA409) (Billingshurst) - see Mixed Use Table above	
Bridgewater Farm, Billingshurst (SA642) (Billingshurst)	c.200 dwellings  (site area c.10.44ha)
Land at Coneyhurst Road, Billingshurst (SA757) (Billingshurst)	<ul style="list-style-type: none"> <li>c.400 dwellings</li> <li>Care home</li> <li>Open space including allotments &amp; community orchard</li> <li>Car park for train station</li> </ul> (an extension to SP HA4 allocation, as shown in the Reg 18 Local Plan) (site area c.23ha)
Harwoods Audi, Five Oaks (SA876) (Billingshurst)	Housing – sought in conclusion of representation. (site area 1.45ha) (It should be noted that, if not allocated, the wider representation sought policy flexibility to enable any future development eg: residential, mixed use or employment)

Land at Hilland House, Billingshurst (SA895) (Billingshurst)	Small site suitable for housing that can demonstrate water neutrality.
Land at Kingsfold Cottage, Billingshurst (SA607) (Billingshurst)	c.20 homes
Land at Marringdean Road, Billingshurst (SA560) (Billingshurst)	c. 80 homes (site area approx. 10 acres)
Land at Marringdean Road / West of Marringdean Road, Billingshurst (Billingshurst)	Housing and supporting infrastructure (site area c.200 acres [80.9ha])
Land East of Stane Street A29, Billingshurst (New [formerly part of] & part of SA043) (Billingshurst)	20 homes
Land at Reservoir Farm, Billingshurst (SA698, SA606) (Billingshurst)	Housing (c.4.9ha) (adjacent the SP HA4 allocation)
<b>Broadbridge Heath</b>	
<i>Lyons Farm, Broadbridge Heath (SA492) - lies within Slinfold Parish - See Slinfold below</i>	
<i>Land to the north of Lower Broadbridge Farm, Broadbridge Heath (Extension of SA102 ) - lies within Slinfold Parish – See Slinfold below</i>	
<b>Colgate</b>	
Land West of Kilnwood Vale (SA291) (Colgate)	c.400 dwellings
Land at Little Clovers Farm, Faygate (SA057) (Colgate)	c.120 homes
<b>Cowfold</b>	
Land East & South West of Eastlands, Cowfold (SA052, SA791 and SA747) (Cowfold)	c.58 dwellings, split site as follows: <ul style="list-style-type: none"> <li>• SA052 Land East of Eastlands Wood – c.1.6ha (38 dwellings)</li> <li>• SA791 Land East of Eastlands Lane c.0.3ha (8-10 dwellings)</li> <li>• SA 747 Land South West of Eastland Lane c.0.6ha (8-10 dwellings)</li> </ul> (potential for a water borehole)
Land to the west and north-west of Cowfold (also known as Land North of A272/Station Road / Land at Capons Hill Farm) (part of SA778) (Cowfold)	65 homes and/or 300 homes



Land North of Bolney Road, Cowfold (Land East of Cowfold), (SA366) (Cowfold)	c.110 dwellings (Potential for water borehole) (site area c.7.2ha; developable area c.5.7ha)
<b>Henfield</b>	
The Paddocks, Henfield (SA692) (Henfield)	c.20-30 dwellings
Land at Parsonage Farm (Western Parcel), Henfield ( <b>NEW</b> – an addition to the west of SA686 allocated in NP)(Henfield)	c.200 dwellings  (whole site c.21.9ha; developable area c.6.8ha)
Land North of Furners Lane, Henfield (SA005) (Henfield)	c.365 dwellings and 80 unit care home as follows: <ul style="list-style-type: none"> <li>• Phase 1: 215 dwellings</li> <li>• Phase 2: <ul style="list-style-type: none"> <li>○ 150 dwellings</li> <li>○ 80 unit care home</li> </ul> </li> </ul> (site area c.16.29ha split as follows: Phase 1 - 8.5ha, and Phase 2 - 7.79ha)
Land East of Henfield (SA123 [land south also SA005 – see above]) (Henfield)	c. 400 with scope to increase to c.850 if land south included (with first phase delivering c.500 homes with scope for open space, community hall and water boreholes). (site area without land south c.36.9ha; with c.52.9ha)
Land at Betley Farm, North of West End Lane, Henfield / Land West of Henfield (SA899) (Henfield)	c.220 dwellings (site area c.7.7ha)
Land North and South of West End Lane, Henfield (SA496) (Henfield)	c.150-180 homes
<b>Horsham</b>	
North Heath Lane Industrial, Horsham ( <b>NEW</b> ) (Horsham)	c.74 dwellings
<i>Land South of Hilliers Garden Centre (SA570) (Horsham - Forest) - see Mixed Use Table above</i>	
Land South of Athelstan Way, Horsham (SA060) (Horsham - Forest)	c.63 dwellings (total site area c.4ha - developable area 2.6ha)
<b>Itchingfield</b>	
Land Rear of Two Mile Ash Road, Barns Green (SA344) (Itchingfield)	c. 6-10 homes on Ropers field [part of SA344: northern field is Ropers Field, southern field is Cheffins field]
Land Rear of Two Mile Ash Road, Barns Green (SA344) (Itchingfield)	63 dwellings (instead of SP HA6 BGR1 and BGR2 sites)

Sumners Field / Land at Sumners Ponds, Barns Green (SA613) (Itchingfield) (Permitted / Policy 9 of Itchingfield Parish Neighbourhood Plan)	32 residential units
Wellcross Farm, Broadbridge Heath ( <b>New</b> – extension of SA622)(Itchingfield)	c.15-20 cottages in C2 Use Class - Retirement housing, extra care and / or specialist care. (site area c.1ha - expansion of a site with outline consent with 1 of 3 phases with Reserved Matters consent)
<b>North Horsham</b>	
<i>Land at Graylands Estate, North Horsham (SA363) (North Horsham) - See Mixed Use Table above</i>	
Land at Newhouse Farm, Horsham (SA127) (North Horsham)	c.120 dwellings (site area 4.9ha within the High Weald National Landscape [formerly AONB])
<b>Nuthurst</b>	
Land North of Mannings Heath (SA788) (Nuthurst)	c.60 dwellings (site lies within the High Weald National Landscape [formerly AONB])
<b>Pulborough</b>	
<i>Harwoods Land Rover, London Road, Pulborough (SA877) (Pulborough) - see Mixed Use Table above</i>	
Land between Faustina and Mill House, A29, Codmore Hill ( <b>NEW</b> ) (Pulborough)	A rural exception site for affordable housing. (site area c.2.4ha)
Land at Greendene, Pulborough (SA112) (Pulborough)	c.65 homes (proposed private water neutrality solution) (site area c.3.52ha)
Land South of Highfields, Codmore Hill (SA767) (Pulborough)	c.45 dwellings (site area c.6 acres)
<b>Rudgwick</b>	
Land at Guildford Road, Rudgwick (Land South of Guildford Road / Land at Fairlee) (SA578) (Rudgwick) (SP37, SP HA14)	c.43 dwellings
Land East of Highcroft Drive, Rudgwick (SA683) (Rudgwick) (SP37, SP HA14)	c.6 dwellings
Land South of Bucks Green Place, Rudgwick (SA731) (Rudgwick) (SP37, SP HA14)	c.6-9 dwellings
Land off Church Street, Rudgwick (SA442) (Rudgwick) (SP37, SP HA14)	c.35 dwellings

Land on the Corner of Church Street (B2128) and Guildford Road (A281), Rudgwick (SA434) (Rudgwick)	c.12-13 dwellings (site area c.0.7ha)
Land East of Woodfalls Manor, Rudgwick (SA327) (Rudgwick)	c.6 dwellings
<b>Rusper</b>	
Land North of Rusper Road, Rusper ( <b>NEW</b> ) (Rusper)	c.20 dwellings as an 'internal' addition to strategic allocation SP HA2 Land West of Ifield (site area c.0.78ha)
Land at Millfields Farm, Rusper (SW part of SA598)(Rusper)	Housing (site area c.3.45ha)
Land at Pucks Croft Cottage, Rusper (SA737) (Rusper)	c. 4 dwellings (site area c.0.48ha)
<b>Shipley</b>	
Land at Home Farm, Coolham (SA010) (Shipley)	Housing
Land at Malden Farm, Shipley Road, South of Southwater ( <b>NEW</b> ) (Shipley)	c.80 homes and open space (site area c.7.3ha)
Land west of Centenary Road, Southwater (SA725) (Shipley)	c.100 homes
<b>Slinfold</b>	
Land NW of West Way / Land rear of Padora-Niblett's Slinfold (SA061) (Slinfold)	c.25 homes
Farthings, Park Road, Slinfold (SA714) (Slinfold)	c.25 homes
Lyons Farm, near Broadbridge Heath (SA492) (Slinfold)	Older Resident – Use Class C2 (30% affordable) comprising: <ul style="list-style-type: none"> <li>• 17 extra care bungalows</li> <li>• 82 extra care cottages</li> <li>• 108 extra care apartments</li> <li>• 60 bed care home (nursing and high dependency residential care; 32 bed specialist dementia care home; community hub with commercial kitchen, therapy/activity rooms, swimming pool with care accommodation above)</li> </ul>
Land to the north of Lower Broadbridge Farm, Broadbridge Heath (Extension of SA102 ) (Slinfold)	c.105 dwellings
<b>Small Dole</b>	
<i>Land at Oxcroft Farm, Small Dole (SA689) - lies within Upper Beeding Parish – see Upper Beeding below</i>	

<b>Southwater</b>	
Land West of Worthing Road, Tower Hill, Horsham (SA765 and part of SA784 [which also includes SA040 & SA626])(Southwater) - See Mixed Use Table above	
Land west of Centenary Road, Southwater (Western Part of SA725) - see Shipley above	
Land at Campfield, Southwater (SA896) (Southwater)	c. 100 homes (whole site 4.26ha; developable area c.2.86ha) (potential onsite water borehole)
Land at Christ's Hospital, The Warren (SA129) (Southwater)	Housing
Land at the Copse, Southwater (minor extension of SA324, SA408) (Southwater)	<ul style="list-style-type: none"> <li>• 76 bed care home</li> <li>• Housing (potentially specialist care, extra care or sheltered)</li> </ul>
Lennox Wood Business Park (part of Southwater Business Park) ( <b>NEW</b> ) (Southwater)	Either residential institution/care home or dwellings (C2 or C3 Use Classes)
Land West of Worthing Road, Tower Hill, Horsham (SA040 [and also part of SA785]) (Southwater)	<p>Either:</p> <ul style="list-style-type: none"> <li>• c.156 extra care and care units / a retirement home (70 apartments), a care home (64 bed) and retirement bungalows (22 units) (Use Class C2) with ancillary facilities; or</li> <li>• c.115 dwellings (Use Class C3)</li> </ul> <p>And/or: Broad location for growth/reserve sites should be identified or allocated – to include the site and land south (SA785 which comprises SA040, SA765, SA626) delivering c.150,000sqft employment space (on SA626) and either: 265 dwellings; or, 156 retirement and care home units (on SA040) and 150 dwellings (on SA765). (site area c.10.2ha)</p>
Land West of Worthing Road, Horsham (SA599) (Southwater)	c.90 homes
Southwater Glebe Vicarage and Hall, Southwater (SA084) (Southwater)	Housing
<b>Steyning</b>	
Clay's Field, Steyning (SA758) (Steyning)	Housing
<b>Storrington and Sullington</b>	
Land at Bax Close, Storrington (SA485) (Storrington and Sullington)	c.31 dwellings (site area c.2.3ha)

Land at Clay Lane, Storrington (SA486) (Storrington and Sullington)	c.60 dwellings
Land South of Kithurst Lane (SA021) (Storrington and Sullington)	In excess of 5 dwellings (greater than 1ha)
Land West of Storrington Road, Storrington (SA469) (Storrington and Sullington)	c.140 homes
<i>Chantry Industrial Estate and Chantry Quarry, Storrington (SA544 &amp; SA620) (Storrington and Sullington) - see Mixed Use Table above</i>	
<b>Thakeham</b>	
Thakeham Tiles, Rock Road, Heath Common, Storrington (SA012)(Thakeham)	c.90 homes (site allocated for housing [indicatively c.50 homes] in made Thakeham Neighbourhood Plan, Policy 2, which is more than 5 years old. Outline consent for 90 dwellings expires 27 Feb 2025 in absence of Reserved Matters application which is delayed due to water neutrality as well as lack of relocation site) (site area c.4.8ha)
Former Thakeham Mushroom Site, Thakeham ( <b>NEW</b> ) (Thakeham)	<ul style="list-style-type: none"> <li>c.250 homes</li> <li>c. 500sqm Flexible non-residential floorspace (Use Class E)</li> </ul> (site area 13.45ha. Potentially borehole on site to server over 250 dwellings)
Former Thakeham Mushroom Site and Land West, Thakeham ( <b>NEW</b> ) (Thakeham)	<ul style="list-style-type: none"> <li>c.400 homes</li> <li>Primary school</li> <li>Local centre including flexible Use Class E floorspace</li> <li>Countryside Park</li> </ul> (site area 30.1 ha. Potentially a borehole on site to serve 400 homes)
Land to the South of Furze Common Road, Thakeham (SA513) (Thakeham)	c.28 dwellings (from Site Assessment Report: site area c. 1ha)
<b>Upper Beeding</b>	
Land North of Church Farm, Upper Beeding (Primarily <b>NEW</b> – part of the site includes SA629) (Upper Beeding)	c.60 dwellings (site area c.3.8ha)
Land at Church Farm, Upper Beeding (Amendment of SA629) (Upper Beeding)	c.4 homes
Land at Oxcroft Farm, Small Dole (SA689) (Upper Beeding)	c.20 dwellings (Southern end of the site is allocated for 20 houses in the made Upper Beeding Neighbourhood Plan – Policies 2 and 4) (site area c.1.31ha)
<b>Warnham</b>	

Land at Station Road, Warnham (SA842 [employment]) (Warnham)	c.48 dwellings (site previously promoted for employment) (site area c.7.46ha)
<b>Washington</b>	
Land at Longbury Hill [Land at Heath Common, Storrington] (SA497) (Washington)	Housing (the submitted Sustainability and Transport Report and Air Quality Feasibility Assessment [both March 2020] indicate 120 dwellings) (site area c.10ha)
<b>West Chiltington</b>	
West Chiltington - Site Unclear – potentially Land at Southmill House (SA889) (West Chiltington)	c.12-17 dwellings
<b>West Grinstead</b>	
Land at Dunstans, Partridge Green (SA634) (West Grinstead)	Housing
Land at Jolesfield Common, Partridge Green / Land West of Littleworth (SA787)(West Grinstead)	c.50 dwellings (site area c.2.25ha)
Land South of Shermanbury Road, Partridge Green ( <b>NEW</b> ) (West Grinstead)	Housing (site area c.23ha)
Land West of Bines Road, Partridge Green (SA891) (West Grinstead)	c.105 residential units (just northeast section of SA891)

#### **EMPLOYMENT:**

*(Predominantly employment) (NB: to be read in conjunction with the 'Omitted Potential Strategic Allocations' Table above):*

All the following form an objection to Strategic Policy 29 New Employment as they seek to be included as an allocation.

<b>Site (SHELAA Ref)(Parish)</b>	<b>Proposed Development</b>
<b>Ashington</b>	
Land East of Ashington (SA077)(Ashington)	24 ha (c.60,000m <sup>2</sup> ) (B2, B8, E Use Classes)
<b>Billingshurst</b>	
Land South of Hilland Farm, Billingshurst (SA573)(Billingshurst)	2.7ha (c.10,000m <sup>2</sup> ) (B2, B8, E(g) Use Classes)
<i>Land at Denver Farm, Okehurst Lane, Billingshurst (SA864) – see the Mixed Use Table above</i>	
<i>Land to the West of Billingshurst / Land East of Lordings Road (SA409)</i>	

<i>(Billingshurst) - see Mixed Use Table above</i>	
<b>Colgate</b>	
Sunnybrook, Tower Road, Faygate ( <b>NEW</b> )(Colgate)	1.3ha
<b>Cowfold</b>	
Oakendene Estate, Cowfold ( <b>NEW</b> ) (Cowfold)	Extension of the designated Key Employment Area to provide: <ul style="list-style-type: none"> <li>• 7ha Employment (expansion from c.3ha to c.10ha)(B2, B8, E(g) Use Classes), and</li> <li>• Renewable Energy Generation (solar PV on farmland)</li> </ul>
<b>Henfield</b>	
The Old Brickworks, Henfield (SA481) (Henfield)	3ha employment land (promoted via SP30 as a Key Employment Area)
<b>Horsham &amp; North Horsham</b>	
<i>Land South of Hilliers Garden Centre (SA570) (Horsham - Forest) - See Mixed Use Table above</i>	
<i>Land at Graylands Estate, North Horsham (SA363) (North Horsham) - see Mixed Use Table above</i>	
<b>Pulborough (and West Chiltington)</b>	
<i>Harwoods Land Rover, London Road, Pulborough (SA877) (Pulborough) - see Mixed Use Table above</i>	
Land North of Broomers Hill Park, Codmore Hill, Pulborough (SA830) (Pulborough)	2.05ha employment land (c.5,000sqm)
Land East of A29 at Brinsbury College, Pulborough (SA831) (Pulborough, and West Chiltington)	c.9ha (c.15,000sqm) for new employment land (Commercial / Industrial use) with associated links to training courses at the college.
<b>Southwater</b>	
<i>Land West of Worthing Road, Tower Hill, Horsham (SA765 and part of SA784 [which also includes SA040 &amp; SA626])(Southwater) - See Mixed Use Table above</i>	
Land at Pollards Way, Southwater (SA772) (Southwater)	10.8ha employment land ((B2, B8 and E Use Classes)(C.20,000sqm)
<b>Storrington and Sullington</b>	
Land at Chantry Quarry, Storrington (SA620) (Storrington and Sullington)	c.70,000sqft employment land (B2, B8 and ancillary office / E(g) Uses)

	(proposed relocation and expansion of existing employment site [Chantry Industrial Estate])  (NB: this forms part of the inclusion in the mixed use table above)
<b>Upper Beeding</b>	
Mackley Industrial Estate, Small Dole ( <b>NEW</b> ) (Upper Beeding)	Expansion / intensification of existing Industrial Estate
<b>Warnham</b>	
Land at Westons Farm, Warnham (SA325)(Warnham)	38ha site to provide: <ul style="list-style-type: none"> <li>• c.50,000sqm (B2, B8 and E(g) Use Classes)</li> <li>• c.1,400sqm (F1 Use Class)</li> <li>• Woodland and Wetland (publicly accessible)</li> </ul>

**OTHER:**

Site (SHELAA Ref)(Parish)	Proposed Development
<b>Rusper</b>	
Land North of Rusper Road, Rusper ( <b>NEW</b> ) (Rusper)	Green link (pedestrian / cycle route) and / or BNG  (include within strategic allocation SP HA2: Land West of Ifield) (site area c.0.93ha)