

Horsham District Council Schedule of Suggested Modifications to the Regulation 19 Local Plan

This schedule sets out proposed wording amendments, correction of factual errors or similar.

Proposed deletions are shown as a ~~striketrough~~ and proposed additions are underlined.

Chapter	Paragraph / Policy Number	Suggested Change	Reason
Contents			
	Policy 39	Should read <u>Strategic</u> Policy 39: Affordable Housing	Factual update as this policy has been drafted and named as a Strategic Policy
Chapter 1			
	Paras 1.11 to 1.14	<p>Delete all paragraphs in their entirety:</p> <p>Next steps</p> <p>1.11 “This document will be published for a formal ‘period of representation’ from Friday 19th January 2024 to Friday 1st March 2024. The document will be available to view...”</p> <p>[delete all text following, up to:]</p> <p>1.14 “...If the Planning Inspector concludes that the plan is ‘Sound’ it will be formally adopted and will replace the Horsham District Planning Framework as the main planning document for the District.”</p>	This text was specific to the Regulation 19 stage process up until the point of submission, and briefly explaining the examination process, and will be redundant by the time the Plan is ready for adoption.
Chapter 2			
	Sub-heading preceding para 2.10	Amend sub-heading: The Gatwick Diamond and Coast to Capital Local Enterprise Partnership	The Coast to Capital LEP (as with all other LEPs) was wound up in March 2024.

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	2.10	Amend text: The majority of Horsham District is located within the Gatwick Diamond economic area which extends from Croydon in the north, around Gatwick Airport and down the A23 corridor to the south coast. Residents of Horsham District contribute to this wider regional economy. <u>Within this area, partnerships between local authorities and businesses will play a role in determining local economic priorities and undertaking activities to drive economic growth, investment and the creation of local jobs.</u>	The Coast to Capital LEP (as with all other LEPs) was wound up in March 2024. To complement the proposed deletion of para 2.11, some additional wording is proposed for para 2.10 to ensure the context of joint regional working is not lost.
	Para 2.11	Delete entire paragraph: “The Coast to Capital Local Enterprise Partnership (LEP) is focused in the Gatwick Diamond area. This LEP is currently a business-led partnership... This will include supporting the sub-regional economy as it continues to emerge from the Covid-19 pandemic, and the pause to development that has arisen as a consequence of the requirement for water neutrality.”	The Coast to Capital LEP (as with all other LEPs) was wound up in March 2024. Some additional wording is proposed for para 2.10 to ensure the context of joint regional working is not lost.
	Para 2.12	Amend third sentence: “...The Council has therefore been mindful of the duty to have regard to <u>further</u> the two purposes of the National Park, namely to conserve and enhance its natural beauty, wildlife and cultural heritage and to promote the opportunities for public understanding and enjoyment of its special qualities. ...”	To bring into line with update to the National Parks & Access to the Countryside Act 1949 made by Section 245 of the Levelling Up & Regeneration Act (LURA) 2023.
Chapter 3			
	Para 3.11	Amend third sentence: “A small area in the south-east of the District also falls within the Sussex coast <u>Coastal West Sussex</u> housing market area.”	Minor correction to ensure consistent terminology.
Chapter 4			

Chapter	Paragraph / Policy Number	Suggested Change	Reason
	Policy 3	Amend policy to include : ' <i>Outside built-up area boundaries, <u>secondary settlements or strategic site allocations</u></i> '	In order to avoid ambiguity between policies in the draft Local Plan, as per paragraph 16 of the NPPF and confirm that development within strategic site allocations would not fall within the definition of the rural area.
	Para 4.16	Amend and of last sentence: "...together with the potential for an allocation to help deliver a school that meets existing and future educational needs including those within Crawley town <u>Borough</u> ."	Factual correction.
	4.20	Amend last sentence: "...the potential for the District to contribute to meeting the significant unmet housing needs for other authorities including <u>firstly</u> Crawley and <u>then</u> the South Coast."	To reflect agreed position as set out in the Northern West Sussex Statement of Common Ground (Housing Need)
	Figure 3 Horsham District Key Diagram (page 28)	Amend legend as follows: "Land <u>North</u> West of Southwater"	To ensure consistency in Local Plan with name of site allocation in HA3
Chapter 5			
	5.3	The Climate Change Act 2008 (2050 Target Amendment) Order 2019 commits the UK to carbon emission reduction target of 100% by 2050 compared with a 1990 baseline. This <u>net zero carbon</u> target will require radical changes in how we live and how we plan our settlements to ensure our energy and transport systems are decarbonised over the next 30 years.	To clarify that the requirement of the 2020 target amendment is commonly referred to as "net zero carbon". The definition of Net Zero Carbon" has been added to the Glossary
	5.16	The development of renewable and low carbon energy is a key means of reducing the District's contribution to climate change. Renewable and low carbon energy can encompass a wide range of technologies including combined heat and power	To reflect that emerging mandatory food and waste composting/recycling will drastically reduce biogenic content of

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		(CHP); combined cooling, heat and power (CCHP); district heating, energy from waste , wind (large and small scale), biomass, solar (thermal and photovoltaics) and heat-pumps.	residual waste, and that the (usually very) inefficient combustion of residual waste should not be regarded as a viable low carbon energy source.
	5.31 Second sentence	"This WRZ is <u>partly</u> supplied from groundwater abstraction, from the Folkestone bed of the Lower Greensand/Wealden Greensand semi-confined aquifer, on the River Arun, close to Pulborough.	Minor factual correction.
	Strategic Policy 9: Water Neutrality	Clause 7 to be amended to read: "Should the need to demonstrate water neutrality no longer be required, new residential development must be designed to utilise no more than 110 litres of mains supplied water per person per day, as per the Building Regulations optional requirement for tighter water efficiency. <u>For non-domestic buildings, the minimum standards for BREEAM 'Excellent' within the Water category will apply.</u> Should tighter national standards be introduced during the Local Plan period applicable for areas of serious water stress, they will be applied."	To make clear of requirements for non-residential properties and to align with policy wording of Crawley Local Plan
	Strategic Policy 10 :Flooding	g) Comply with the tests and recommendations set out in the Horsham District Strategic Flood Risk Assessments (SFRAs), <u>and the Crawley Borough Strategic Flood Risk Assessments (SFRAs) where development is within and adjacent to the Upper River Mole catchment.</u> m) <u>Consider the cumulative impacts of development on flood risk elsewhere.</u> i) 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;	Include reference to the Joint HDC CBC Upper Mole SFRA. To reflect representations made about the potential for cumulative impacts on flooding and the need to take account of surface water, together with requirement for blue as well as green infrastructure.

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		3. New development which incorporates SuDS will be supported where it considers amenity value, green <u>and blue</u> infrastructure, local ecological resources including water quality and biodiversity, natural flood management methods, and contributes towards environmental net gain. An appropriately detailed assessment should be submitted to demonstrate an appropriate SuDS strategy.	
Chapter 6			
	Strategic Policy 11: Environmental Protection	Amend wording of criterion 3, 4 and 6 as follows: "3. Maintain or <u>and improve</u> the environmental quality of any watercourses, groundwater and drinking water supplies," "6. Minimise <u>Ensure no unacceptable impacts result from</u> air pollution and greenhouse gas emissions in order to protect human health and the natural environment."	To take strengthened wording so as to be more closely aligned with NPPF.
	Strategic Policy 11: Environmental Protection	Amend criterion 4 to read as follows: "..... , particularly with regard to <u>and avoid adverse impacts on and protect the integrity of</u> the South Downs International Dark Sky Reserve designation."	To ensure wording is sufficiently clear and robust to be effective.
	Strategic Policy 13: The Natural Environment and Landscape Character	Amend criteria 2, 3 and 4 as follows: "2. Maintain and enhance the Green Infrastructure Network, the Local Nature recovery Strategy and national Nature Recovery Network and, where practicable , help to address any identified needs and deficiencies, these networks across the District;	To reflect the increasing importance to be given to biodiversity and Nature Based solutions in accordance with the Environment Act and secondary legislation.
	Para 6.14	This document sets out the mechanisms for calculating the additional transport emissions associated with development and the method for determining the estimated monetary value of	Factual clarification

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		damage from proposed development caused by pollutants including small <u>fine</u> particulates matter (PM40s <u>PM2.5</u>) and nitrogen oxides (NOx).	
	Para 6.32	Amend third and fourth sentences: “...Applicants will need to be mindful of this <u>should have regard to the need to further the statutory purposes of the National Park</u> in relation to any proposals close to the South Downs National Park boundary <u>and ensure that development within its setting should be sensitively located and designed to avoid or minimise adverse impacts.</u> The Council will have regard to the South Downs National Park Local Plan, the South Downs Integrated Landscape Character Assessment, the South Downs Partnership Management Plan, <u>the South Downs View Characterisation Study</u> and any other relevant documents and updates. The Council will also seek to support the National Park’s status as an International Dark Night Skies Reserve in its decision making.”	For clarification and consistency with NPPF, and to bring into line with update to the National Parks & Access to the Countryside Act 1949 made by Section 245 of the Levelling Up & Regeneration Act (LURA) 2023.
	SP16: Settlement Coalescence, part 4	Amend text: “Proposals within land that contributes to the setting of the South Downs National Park should be consistent with National Park purposes and have regard to the South Downs Local Plan, the South Downs Integrated Landscape Character Assessment, the South Downs Partnership Management Plan, <u>the South Downs View Characterisation Study</u> and any other relevant document and updates. In particular, proposals should not...”	Clarification of key documents
	Paragraph 6.44 (SP17)	Split paragraph After third sentence which ends before development can lawfully commence”. In new para add the following text – the first two sentences of which are a reversal of the existing order at the end of para 6.44	Since the BNG regulations became applicable various implementation issues have been identified either nationally and locally, which may be altered or require

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		<p>“6.55 For the purposes of this policy the types of development subject to mandatory biodiversity net gain laid out in regulations constitutes ‘relevant development’. Sufficient biodiversity gain information will be required at application stage to appropriately inform what constitutes the developable area and to ensure the required biodiversity net gains can be delivered. <u>Applicants should refer to additional relevant national planning policy, and any BNG guidance published by the Council, or any other relevant update, in ensuring the relevant information is submitted.</u></p>	<p>further clarification. Some of this will be set out in future guidance which is to be prepared by HDC for use by applicants and officers.</p>
	<p>Strategic Policy 17: Green Infrastructure and Biodiversity (and supporting text)</p>	<p>All references to ‘green infrastructure’ be amended to refer to ‘green <u>and blue</u> infrastructure’ including the policy title.</p>	<p>To clarify that that opportunities to enhance and consider the water environment are reflected</p>
	<p>Strategic Policy 17: Green Infrastructure and Biodiversity</p>	<p>Criterion 8: Amend this Policy criterion to read as follows: “Proposals must give appropriate consideration to protected, <u>priority</u> and notable species. They will be expected to protect <u>populations of protected</u>, priority <u>and notable</u> 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.”</p>	<p>To provide clarity over the regard to be given to species.</p>
Chapter 7			
	<p>7.9</p>	<p>27 <u>29</u> Conservation Areas</p>	<p>Factual update - two Conservation Area’s have recently been designated.</p>
	<p>Strategic Policy 19: Development Quality</p>	<p>Criterion 8 – Amend to read as follows:</p>	<p>To clarify the requirement to consider the setting of the AONB.</p>

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		<p>“If located within, <u>or affecting the setting of</u>, the High Weald Area of Outstanding Natural Beauty, proposals for housing should have regard to the High Weald Housing Design Guide.”</p>	
Chapter 8			
	Para 8.5	<p>It will be essential for infrastructure to be provided in a timely way that meets the needs of the new development as it comes forward. Studies to determine whether the proposed development will lead to overloading of existing infrastructure may be required to support planning applications. <u>Specific identified requirements are set out in the relevant site allocation policies.</u> It will also be necessary to understand from key infrastructure providers the timing and delivery of any key new upgrades that may be necessary, such as road upgrades or new water treatment facilities, and the level of development that can come forward prior to the completion of these upgrades, as this may impact on the speed at which the new development can come forward. <u>Developers will be required to demonstrate that infrastructure capacity and required upgrades can be delivered in accordance with an agreed phasing scheme for multi-stage developments.</u></p>	To provide context for requirement for some sites to prepare Phasing and Implementation Strategy.
	Para 8.6	<p>In order to address wastewater treatment <u>assess available waste water network</u> capacity, developers are encouraged to contact the water/wastewater infrastructure provider as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater reinforcement requirements. Where there is a capacity constraint, the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</p>	Factual update to use correct terminology

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	Strategic Policy 23: Infrastructure	<p>Add sentence to para 8.5: <u>“Where the need for improved infrastructure is identified, this should be based on up-to-date evidence which demonstrates how improvements are responsive to changing circumstances, and contribute to sustainability objectives, and sustain the high quality of life as part of the "monitor and manage" approach.”</u></p>	To ensure flexibility and deliverability of required infrastructure in accordance with identified needs.
	Strategic Policy 23: Infrastructure Provision	<ol style="list-style-type: none"> 1. The release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development, or suitable necessary mitigation arrangements for the improvement of the infrastructure, services and community facilities caused by the development being provided. 2. Where there is a need for extra capacity, this will need to be provided in time to serve the development or the relevant phase of the development, in order to ensure that the environment and amenities of existing or new local residents is not adversely affected. <u>Where distinct development phases are expected, a Phasing and Implementation Strategy will be required at outline, hybrid or full planning application stage, which demonstrates what infrastructure enhancements will be delivered, and at what stage in the development.</u> 	To ensure infrastructure upgrades will be in place, or secured, to align with the development.
	Para 8.11	<p>Add new sentence to end of paragraph: For developments that generate significant amounts of movement, interventions should be documented in a Transport Assessment or Statement submitted in support of the application, and a Travel Plan produced to ensure measures are implemented and sustained. These must prioritise active travel, and ensure that all new development is well-connected to wider cycling and walking networks, including appropriate contributions to support off-site improvements. Impacts on the</p>	To ensure delivery of proposed mitigation measures.

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		wider strategic road network may also need to be considered. <u>The transport assessment or statement and/or in the Travel Plan must include a monitoring framework and review mechanism to ensure the ongoing effectiveness of measures proposed.</u>	
	Para 8.13	Add text to last sentence before first bullet point: These will be facilitated primarily by the development of strategic sites, and supported as necessary through further developer funding, <u>which will derive in full or in part from the Community Infrastructure Levy:</u> ...	To clarify the main mechanism for doing so, which is consistent with Strategic Policy 23: Infrastructure Provision and supporting para 8.4.
	Para 8.13 (last bullet)	Amend as follows: “Upgrade to Hop Oast Roundabout (A24/B2237) to introduce traffic signals and change the layout <u>to enable priority for buses.</u> ”	To enable bus prioritisation subject to evidence of this being the best solution.
	Para 8,13 (additional bullet)	Add a new bullet point to the list of proposed strategic junction improvements: “ <u>Upgrade to Great Daux Roundabout to include traffic signals and additional lanes</u> ”	Evidence update has shown that the improvement is also necessary to mitigate the new Local Plan as well as the existing North Horsham development. Hence reference added for completeness.
	Para 8.14	Additional sentence as follows: The Council has worked with partners to produce a Horsham Local Cycling and Walking Infrastructure Plan (LCWIP). This sets out cycling and walking network plans within a 5km radius of Horsham town centre, and a prioritised programme of improvements for future investment. Strategic Policy 24 expects development to have regard to this programme, as well as to any future LCWIPs across the District, together with any relevant government guidance including LTN1/20 – Cycle Infrastructure design, or any future updates. <u>Where the LCWIP networks</u>	For clarification

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		<u>provide potential links to a development, the applicant should contribute to delivering or improving that part of the network.</u>	
	Policy 24 part 1.c	Addition to part 1(c) as follows: "Walking, and -cycling <u>and wheeling</u> routes are <u>as appropriate provided or improved both on- and off-site, and designed to be...</u> "	For clarity. Reference to wheeling added for consistency with other Plan policies/text.
	Policy 24 part 1.d	Change policy text as suggested: "Where feasible, provision is made for bus travel and infrastructure within the development <u>and where appropriate on routes connecting to the development</u> , to include as appropriate..."	To strengthen policy and provide certainty.
	Para 8.18	Change wording: "It is critical that the needs of disabled drivers <u>and passengers</u> , and users of mobility scooters, are accommodated."	For clarity
	Para 8.19	Add sentence at end of paragraph: " <u>Applicants should refer to any relevant advice that may be published on this matter including by HDC and WSCC.</u> "	For clarity and consistency
	Para 8.20	Amend last sentence: Locations within the airport boundary will remain the most sustainable places for airport parking, and in general additional off airport facilities will not be considered acceptable.	To ensure consistency with part 9 of Policy 25: Parking.
	Policy 26: Gatwick Airport Safeguarding	2. Minor development within this area, such as changes of use and small-scale building works such as residential extensions, will normally be acceptable. <u>Improvements to existing employment buildings, including small scale extensions and refurbishment, will normally be acceptable provided they will not lead to a significant intensification or increase in the scale of development.</u> Where appropriate, planning permission may be	Changes made to reflect wording in CBC's Main Mods local plan required for consistency (GAT2). Rewording agreed with airport and requested by CBC Local Plan inspectors for soundness.

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		granted on a temporary basis. The airport operator will be consulted on all planning applications within the safeguarded area.	
	Policy 28: Community Facilities and Uses	Amend criterion 3.b) to read as follows: "3.b) <u>an assessment has been undertaken which clearly shows any open space to be lost is surplus to requirements and</u> evidence is provided that demonstrates the continued use of the site as a community facility or service is no longer feasible, taking into account factors such as; appropriate active marketing, the demand for a community use within the site or premises, the quality, usability, viability and the identification of a potential future occupier.	To reflect the requirements of paragraph 99 of the NPPF (Sept 2023)
Chapter 9			
	Policy 32: Conversion of Agricultural and Rural Buildings to Commercial, Community & Residential Uses	Amend policy title: Conversion of Agricultural and Rural Buildings to Commercial, Community & Residential Uses	Factual update and for clarification given the policy wording only relates to conversion to residential use and Policy 31 addresses conversion of rural buildings to economic / enterprise uses.
Chapter 10			
	Para 10.8	Amend paragraph: Crawley Borough Council is also in the process of undertaking a local plan review, and the Plan at the time of writing has yet to be adopted. Current indications are that Crawley can meet almost half of its needs in the plan period, with a total of 7,050 <u>7,505</u> dwellings (414dpa <u>441dpa</u>) to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of	Factual update to accept main modification tabled at Crawley's examination, on request of their Inspectors, in relation to an amended Crawley Local Plan period as well as correcting a previous error.

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		sustainable development (including the issue of water neutrality).	
	Para 10.25	<p>...Overall, it is considered that there is potential for an additional 500 homes, which would include Land at Cuckmere Farm <u>that falls within the saved Horsham District Planning Framework allocation but outside of the extant outline application 'red line' boundary. Provision for these additional 500 homes is set out in Policy 37 below for completeness. This brings the total number of homes to be built on the site to around 3,250. It is however expected that only 2,000 of these new homes will have been built by the end of the Plan period.</u></p>	For clarification regarding the intensification of "Land North of Horsham"
	Strategic Policy 37	<p>1. Homes that are already permitted or have been allocated in a "made" Neighbourhood Plan, including previously allocated strategic sites:</p> <ul style="list-style-type: none"> • At least 2,000 at Land North of Horsham • At least 1,400 at Kilnwood Vale • At least 275 at Land West of Southwater <p>2. New Strategic Sites</p> <p>a) At least 1,600 homes on Land West of Ifield (from an allocation of 3,000 dwellings <u>homes</u>)</p> <p>b) At least 735 homes on Land North West of Southwater (from an allocation of 1,000 dwellings <u>homes</u>)</p> <p>c) At least <u>The entire allocation of</u> 650 homes on Land East of Billingshurst (from an allocation of 650 dwellings)</p> <p>4. An additional 60 dwellings from intensification of the Land North of Horsham allocation (Horsham District Planning Framework, November 2015). This intensification totals 500 dwellings and includes Cuckmere Farm and</p>	<p>For clarification regarding the intensification of "Land North of Horsham"</p> <p>And consistency between homes/ dwellings</p> <p>Evidence indicates that HDC cannot deliver 10% of allocations on sites below 1ha.</p>

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		<p>4 <u>Land North of Horsham</u></p> <p>a) <u>as identified in Horsham District Development Framework (2015) saved policies SD1 to SD9 inclusive and the “Land North of Horsham Concept Masterplan map” is expected to deliver around 3,250 homes in total.</u></p> <p>b) <u>of this total, around 2,000 homes will be delivered within the Plan period, and</u></p> <p>c) <u>within the 2,000 homes, land at Cuckmere Farm will deliver 60 homes within the Plan period.</u></p> <p>5. Approximately 1,680 windfall homes units, including 10% provision on land less than 1 hectare.</p>	
	Strategic Policy 37	<p>After para 27 add a new para 10.28</p> <p><u>“The NPPF states (paragraph 69, September 2023) that local authorities should identify through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare, unless it can be shown that there are strong reasons why this 10% target cannot be achieved. Due to the nature of development in this rural District (with delivery heavily reliant on a small number of large sites), this figure cannot be reached. However, sites smaller than 1ha will be considered positively where they meet all other development criteria in this plan.</u></p>	Evidence indicates that HDC cannot deliver 10% of allocations on sites below 1ha.
	Para 10.36	Title should read: <u>Strategic Policy 39: Affordable Housing</u>	Clarification to reflect status as a strategic policy – as set out on page 139

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	Strategic Policy 43	2 b) the site has safe and convenient access to the highway and public transport services <u>for all users, including pedestrians and cyclists.</u>	For clarity
	Para 10.80	Amend last sentence to read: “... the <u>West Sussex</u> Joint Minerals Local Plan (JMLP), <u>2018 (Partial Review 2021)</u> ...”	To correct factual error in title name
	HA1	3. Development shall be designed and laid out, incorporating character areas exhibiting a range of appropriate densities and building heights and typologies, to create a strong sense of place which respects the existing settlement and enhances the landscape qualities of the area, and provide Green Infrastructure <u>green and blue infrastructure</u> within the site that provides functional links beyond the site, and contributes to the wider nature recovery network. 4. Strategic Scale development must also be designed to minimise water consumption, and contribute to water neutrality <u>and not result in an increase in flood risk on the site or elsewhere.</u>	To clarify that that opportunities to enhance and consider the water environment are reflected, and the need to ensure that development proposals consider on and off site impacts on flood risk.
	HA1 (new criterion)	Insert new criterion 10 and renumber later criteria: <u>“10. A Phasing and Implementation Strategy will be required at outline, hybrid or full planning application stage, to set out development phase timescales, which demonstrates what infrastructure enhancements will be delivered (both on- and off-site), and at what stage in the development.</u>	To ensure infrastructure upgrades will be in place, or secured, to align with the development.
	Para 10.86	The new communities will demonstrate excellence with regards energy efficiency and sustainability, water use efficiency, active and sustainable transport, high quality urban design and effective use of land, green <u>and blue</u> infrastructure connectivity and biodiversity net gain.	To clarify that that opportunities to enhance and consider the water environment are reflected,

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	Para 10.88	Amend to read: “Development in this location will also need to ensure infrastructure impacts in and around the town <u>Crawley</u> are considered cumulatively, taking account of development within and around the town <u>Crawley Borough</u> .”	Factual correction
	Para 10.90	Amend last sentence: “Given the particular housing needs of the area, as evidenced in the emerging Crawley Local Plan <u>Crawley Borough Local Plan 2023-2040</u> ,...”	Factual update
	Para 10.91	Any development in this location must respect the rural and natural environment and local heritage and be brought forward in a sensitive way which generates net biodiversity gain, effectively mitigates any adverse impacts on protected species such as bats and delivers green <u>and blue</u> infrastructure that is functionally linked to the surrounding environment.	To clarify that that opportunities to enhance and consider the water environment are reflected.
	Para 10.94	A comprehensive masterplan (<u>see illustrative Figure 7</u>) has been developed to ensure that issues such as flood risk, biodiversity net gain, carbon neutrality, air quality and noise impact and water neutrality are comprehensively addressed ahead of any development taking place. <u>This is not intended to be ‘fixed’ and is expected to evolve as understanding of environmental constraints and infrastructure needs are refined, to ensure that impacts are mitigated.</u> The masterplan will also ensure that the development is landscape-led, includes a Gypsy and Traveller residential site, and provides excellent green <u>and blue</u> infrastructure and recreational links (including via public rights of way) to the wider countryside.	To reflect the potential for the masterplan to be updated in response to evolving evidence on matters such as the Bechstein’s bats population (NE) and educational provision (WSCC). To clarify that that opportunities to enhance and consider the water environment are reflected.

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	Para 10.95	Add text to first sentence: Evidence from strategic transport modelling shows that to deliver the Land West of Ifield, significant mitigation will be necessary to mitigate the impacts on the local road network, <u>potentially including roads in Crawley Borough, in Surrey, and in Horsham District itself.</u>	To clarify that mitigation may be needed in all of these administrative areas, given the proximity of the site to administrative boundaries.
	10.97	Amend first sentence: "It is recognised that a proposal for 3000 homes is unlikely to be able to deliver a full Crawley Western multi-modal corridor that connects the A264 at <u>near</u> Faygate to the A23 south of Gatwick Airport, north of County Oak." Amend last sentence: Land <u>An area of search</u> is therefore safeguarded-identified in the plan to allow for the delivery of such a road. An indicative safeguarded area of search for the full corridor is shown on the Policies Map.	The precise location of the connection point to the A264 is not firmly established, so flexibility is required in wording. 'safeguarding' may be considered too prescriptive when what is meant is to identify an area of search.
	Para 10.98	Amend text: "It is recognised that development of new homes and associated infrastructure in this area will have an impact on traffic movement both within Ruser Parish and Crawley town <u>Borough.</u> "	Factual correction
	HA1	Update final sentence in point 4 as follows " Strategic scale development must also be designed to minimise water consumption, contribute to water neutrality <u>and not result in an increase in flood risk on the site or elsewhere</u>	To ensure that on and off site impacts of flooding are considered as part of any proposal.

Chapter	Paragraph / Policy Number	Suggested Change	Reason
	Strategic Policy HA2: Land West of Ifield -part 2.a	Amend/add to text: “Approximately 3,000 homes (C2 and C3 Use Class), a minimum 40% of which will be affordable homes, together with <u>and to include</u> provision for young families, older people, land for Community Land Trust (or similar community led scheme) housing and, together with the provision of a permanent Gypsy and Traveller site of 15 pitches. <u>A blended mix of housing sizes will apply, to take into account both Horsham’s and Crawley’s strategic mixes for affordable and market housing, as expressed in respective local plans.</u> ”	Clarification around types of provision and of approach to reflect needs of both HDC and CBC.
	Strategic Policy HA2: Land West of Ifield -part 2.b	Add to text: “Approximately 3,300 sqm of retail space to cater for day-to-day shopping and service needs delivered as part of the Neighbourhood Centre and/or secondary neighbourhood centre and a medium size food store, <u>subject to a retail impact assessment with account taken of existing Crawley retail centres.</u> ”	To ensure no unintended impacts on the viability or success of existing retail in Crawley borough.
	Strategic Policy HA2: Land West of Ifield -part 2.e.i and part 2.e.ii	Change text: e) Land and contributions to meet the education provision standards advised by the Local Education Authority, (or any future updates <u>based on refinement of needs evidence</u>) as follows: i. “ two one <u>2-form entry primary school and one 2-form entry expandable to 3-form entry primary school, both</u> to incorporate support centres for special educational needs,” ii. an 8-form entry <u>expandable to 10-form entry</u> secondary school, to incorporate...”	To reflect WSCC evidence that the provision of two primary schools, and also the provision of a 10-form entry secondary school, may be necessary in the longer term depending on precise mix of housing types and changing demographics.
		Add a new sub-criteria ‘vi’ at end of part g: “...Informal open space provision must be designed for all and shall include (but not be limited to):	For clarity, reflecting the emerging proposals include allotments.

Chapter	Paragraph / Policy Number	Suggested Change	Reason
		... <u>vi. community allotments.</u> ”	
	Strategic Policy HA2: Land West of Ifield -part 8.e	Amend as follows: “A comprehensive Travel Plan and Construction Travel Plan to be agreed by the Council and Local Highway Authority is submitted, to cover the entire construction period, which demonstrate the long-term embedment of the transport strategy, and which must include a monitoring framework and review mechanism to ensure the ongoing effectiveness of measures proposed.”	To ensure the strategic site allocation is comprehensive and clear on expectations with regards travel plan.
	Strategic Policy HA2: Land West of Ifield -part 8.g	Amend text: Formal and informal open space, sport and recreation provision is provided to meet the needs of the new community in accordance with standards and the respective recommendations in the Playing Pitch Strategy and Open Space, Sport & Recreation Review 2021 <u>(or any subsequent updates)</u> .	To reflect the potential for future updates to the evidence base over the lifetime of the scheme.
	Strategic Policy HA2: Land West of Ifield -part 9	Amend as follows: “No development shall occur within an <u>safeguarded</u> area of search as shown on the Policies Map that may prejudice a full Crawley Western multi-modal corridor...”	‘safeguarding’ is considered too prescriptive – clarify when what is meant is to identify an area of search.
	Strategic Policy HA3 “Land North West of Southwater” Background Text Para 10.100	“The total additional growth over the wider period would therefore amount to <u>around</u> 1,000 homes”	Consistency with wording elsewhere in the plan

Chapter	Paragraph / Policy Number	Suggested Change	Reason
	Strategic Policy HA3 “Land North West of Southwater” Background Text Para 10.101	“This policy therefore allocates the land area for at least <u>around</u> 1,000 homes, of which 735 are expected to be delivered in the period to 2040.”	Consistency with wording elsewhere in the plan
	Strategic Policy HA3 “Land North West of Southwater” Background Text Para 10.108	“A comprehensive masterplan (see <u>Illustrative</u> Figure 8) has been developed <u>will be agreed with the Council at the planning application stage</u> , to ensure that issues such as: biodiversity, net gain, heritage, carbon neutrality, air quality and noise impact and water neutrality are comprehensively addressed ahead of any development taking place”.	To reflect the potential for the masterplan to be updated in response to evolving evidence
	Strategic Policy HA3 “Land North West of Southwater” Part 1	“is allocated for mixed-use strategic development and associated infrastructure for <u>around</u> 1,000 homes. of which it is anticipated 735 homes will be delivered in the Plan period. This delivery comprises <u>includes</u> 450 homes allocated in the Neighbourhood Plan”. together with an additional 285 homes.	For clarity and to avoid duplication with SP37.
	Strategic Policy HA3 “Land North West of Southwater” Part 2	“Development will be in accordance with a comprehensive masterplan to be agreed with the Council <u>at the planning application stage</u> , which clearly shows the key elements of development, a comprehensive site-wide Design Code, and a clear phasing plan and will provide the following:”	To reflect the potential for the masterplan to be updated in response to evolving evidence
	Strategic Policy HA3 “Land North West of	“A neighbourhood centre shall be provided, offering appropriate uses, including such as <u>leisure, sports facilities, and retail</u> whilst retaining Lintot Square as the primary centre of Southwater”	To reflect that there are a range of uses which may be suitable in the

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	Southwater” Part 2b)		neighbourhood centre and ensure the policy is sufficiently flexible.
	Strategic Policy HA3 “Land North West of Southwater” Part 2dii)	“ up to 6 form entry secondary school expandable to 8 forms of entry”	To reflect WSCC requirements that a secondary school smaller than 6 forms of entry would not be acceptable
	Strategic Policy HA3:”Land North-West of Southwater” -part 2.e	“Formal and informal open space, sport and recreation provision to meet the needs of the new community in accordance with standards and the respective recommendations in the Playing Pitch Strategy Open Space, Sport & Recreation Review 2021 (<u>or any subsequent update</u>).”	To reflect the potential for future updates to the evidence base over the lifetime of the scheme.
	Strategic Policy HA3: “Land North West of Southwater” -part 7.a	“...It should take account of the West Sussex County Council schemes from their “Walking and Cycling Strategy (2016-2026)” (<u>or any subsequent update</u>), including investigating direct and indirect walking and cycling routes connecting Horsham to Southwater.”	To reflect the potential for future updates to the evidence base over the lifetime of the scheme.
	Strategic Policy HA3 “Land North West of Southwater” -part 7b)ii)	“A new footway <u>and LTN1/20 compliant cycleway</u> will also be provided along Station Road at Christ’s Hospital to complete the route and deter on-verge parking associated with the station, <u>subject to the availability of sufficient highway land</u> ”	To ensure adequate facilities are provided for non-private car users and ensure policy is effective with regards to the availability of land for this purpose.
	Strategic Policy HA3: “Land North West of Southwater” -part 7.c.i	“a new link road between the development and <u>Worthing Road Hop Oast roundabout</u> ”;	To reflect WSCC feedback that new link road should not connect directly to Hop Oast roundabout.

Chapter	Paragraph / Policy Number	Suggested Change	Reason
	Strategic Policy HA3: "Land North West of Southwater" -part 7.c.ii)	"full signalisation of the Hop Oast roundabout to allow safe crossing of pedestrians, cyclists, <u>and equestrians</u> north to Horsham..."	WSCC for clarification - Wording should be amended to include equestrian use
	Strategic Policy HA3: "Land North West of Southwater" Party 7c) iii)	" <u>At least</u> four new accesses to the development, in consultation with West Sussex County Council, in order to spread traffic evenly across the development".	Clarification of minimum number of access points to the development
	Strategic Policy HA3: "Land North West of Southwater" Party 7c) v)	"improvements <u>for active and sustainable modes</u> between <u>Worthing Road and Cedar Drive</u> roundabout and <u>to</u> the new <u>primary and</u> secondary school site."	Clarify the nature and location of the proposed improvements
	Strategic Policy HA3: "Land North West of Southwater" Party 7c) v)i	"The provision of a sustainable link for pedestrians and cyclists between Southwater Village and Horsham , including <u>a safe, convenient and comfortable</u> crossing of the <u>A24</u> . This may <u>include measures such as</u> a bridge, underpass, or the <u>signalisation of the Hop Oast junction</u> .) signal-controlled toucan crossing close to Hop Oast roundabout in consultation with, and as agreed by, West Sussex County Council".	Increased flexibility to allow for more options that would deliver a safe, convenient and comfortable route for active travel.
	Strategic Policy HA3: Land North-west of Southwater -new criterion to follow part 7.c	" <u>d) A comprehensive Travel Plan and Construction Travel Plan to be agreed with the Council and Local Highway Authority, to cover the entire construction period, which demonstrate the long-term embedment of the transport strategy, and which must include a monitoring framework and review mechanism to ensure the ongoing effectiveness of measures proposed.</u> "	To ensure the strategic site allocation is comprehensive and clear on expectations with regards travel plan.

Chapter	Paragraph / Policy Number	Suggested Change	Reason
	Figure 8	Figure 8 “Land North West of Southwater <u>Illustrative</u> Masterplan”	To reflect the potential for the masterplan to be updated in response to evolving evidence
	Para 10.116	Amend text: “Policy HA4 requires submission of a comprehensive Travel Plan. It is especially important at this location to reduce reliance on combustion engine motor traffic due to the potential effects of nitrogen deposition <u>and ammonia</u> on the nearby Mens SAC. <u>The Travel Plan must include measures to adequately address the issues highlighted in the Habitats Regulations Assessment. Measures must include electrical charging points for all car parking spaces within the allocation area and</u> could include (but are not limited to) provision of communal minibus and car club spaces; bicycle <u>share club</u> ; high quality cycle <u>infrastructure and</u> parking and workplace shower facilities; onsite services and shop; Personalised Journey Planning for residents; workplace Travel Plans, and high-quality information for residents on sustainable travel options (including easy availability of bus timetables). If the transport assessment concludes that the development will increase the number of HGVs using the A272 at The Mens to or above 200 HGVs per day, measures should be taken to either reduce this to less than 200 or ensure Euro6 standard compliance”	To ensure development is HRA compliant and the plan is legally sound.
	Para following 10.119 (currently un-numbered)	Amend text: “A comprehensive masterplan (<u>see illustrative</u> Figure 9) has been developed...”	To reflect the potential for the masterplan to be updated in response to evolving evidence
	Strategic Policy HA4: Land East of Billingshurst - criterion 2.e	Formal and informal open space, sport and recreation provision shall be provided to meet the needs of the new community in accordance with standards and the respective recommendations in the Playing Pitch Strategy and Open Space, Sport & Recreation Review 2021 (<u>or any subsequent updates</u>).	To reflect the potential for future updates to the evidence base over the lifetime of the scheme.

Chapter	Paragraph / Policy Number	Suggested Change	Reason
	Strategic Policy HA4:Land East of Billingshurst Criterion 6	Proposals must be accompanied by a comprehensive transport strategy with development to include and legible layout which facilitates all modes of sustainable transport <u>including active travel, and...</u> "	To ensure development is HRA compliant and the plan is legally sound
	Strategic Policy HA4: Land East of Billingshurst - criterion 6.f	Amend final sentence as follows: "Provision must be phased in accordance with railway safety requirements, and where not provided from the outset designed and land safeguarded to enable ramped wheelchair accessible provision in due course, <u>and facilitate the closure of the level crossing.</u> "	To meet National Rail requirements in relation to public safety
	Strategic Policy HA4: Land East of Billingshurst - criterion 6.g	Amend as follows: "A comprehensive Travel Plan and Construction Travel Plan to be agreed by the Council and Local Highway Authority is submitted, to cover the entire construction period, which demonstrate the long-term embedment of the transport strategy, <u>and which must include a monitoring framework and review mechanism to ensure the ongoing effectiveness of measures proposed...</u> "	To ensure the strategic site allocation is comprehensive and clear on expectations with regards travel plan.
	Strategic Policy HA4: Land East of Billingshurst - criterion 6.h	Insert an additional criterion to read as follows: <u>"6. h) The improvement of shared/public transport services."</u>	To ensure development is HRA compliant and the plan is legally sound
	Para 10.125	Amend last sentence to read: "... the <u>West Sussex Joint Minerals Local Plan (JMLP), 2018 (Partial Review 2021) ...</u> "	To provide correct reference as requested by WSCC.
	HA7	d) Have regard in the design and setting of development to the areas of the site affected by Flood Zones 2 and 3 <u>by steering development to areas of lowest flood risk.</u>	To ensure adequate consideration of flood risk

Chapter	Paragraph / Policy Number	Suggested Change	Reason
		e) <u>Have regard in the design and setting of the development to the high pressure gas pipeline to the east of the site;</u> Renumber following paragraphs to f) and g)	
	HA11	Insert new criterion b) <u>Development proposals within and adjacent to the High Weald National Landscape (AONB) must demonstrate how their development proposals conserve and enhance the natural beauty of this landscape. Proposals should have particular regard to the setting and views into and out of the National Landscape and all proposals must take account of the High Weald Management Plan.</u>	To ensure development takes account of the nearby High Weald National Landscape designation.
	HA12 (PG1)	PG1 a) Are limited to the western <u>eastern</u> portion of the site and retain the mature boundaries surrounding the site.	To correct a factual error in drafting.
	Para 10.149	Amend first three lines of paragraph to read: "Rudgwick, <u>Cox Green</u> and Bucks Green are adjacent settlements located in Rudgwick Parish. Rudgwick village is the larger settlement lying either side of the B2128/Church Street, <u>with Cox Green adjoining to the north.</u> Rudgwick Bucks Green is a largely linear settlement on the A281/Guildford Road.	Factual correction
	10.150	Amend second sentence of paragraph to read: "It did not make any housing allocations, but its policies apply to any applications in Rudgwick <u>Parish.</u> and Bucks Green "	Factual correction to reflect Neighbourhood Plan applies to entire Parish.
	Policy HA14	Correct policy titles to read: "Strategic Policy HA14: <u>Rudgwick, Cox Green and Bucks Green</u> "	To reflect policy settlement hierarchy and policy map
	Policy HA15	The following sites are allocated, as shown on the Policies Map, for the provision of at least: <u>22 32</u> homes:	To correct factual error

Chapter	Paragraph / Policy Number	Suggested Change	Reason
		<ul style="list-style-type: none"> • RS1: Land at Rusper Glebe, 0.6 hectares (12 homes) • RS2: Land north of East Street, 0.9 hectares (20 homes) 	
	HA17 (STE1)	<p>Insert additional criterion d) <u>safeguard the amenity of local residents from odour and noise pollution from the Steyning Waste Water Treatment Works and Kings Barn Waste Pumping Station. Proposals should be supported by an odour assessment report.</u></p>	To ensure any proposal is compliant with Paragraph 180 (e) of the NPPF.
	HA18 (STO1)	<p>Add new criterion 4:</p> <p><u>The development is landscape-led supported by a Landscape and Visual Impact Assessment to inform site layout and capacity and safeguard any key views to and from the South Downs to avoid or minimise adverse impacts on the South Downs National Park.</u></p>	To reflect feedback and ensure that the proposals do not have adverse impacts on the SDNP.
	HA18 STO1	<p>Amend policy criterion c as follows:</p> <p>c) Have appropriate regard to the setting of West Wantley Farmhouse (Grade 2*), and East Wantley Farm (Grade II) <u>and East Wantley Barn (Grade II). An appropriate buffer should be provided on the northern section of the site to retain the setting of these properties.</u></p>	To reflect feedback raised as part of the consultation in relation to potential impacts on the listed building and ensure development respects the built heritage.
	10.158	<p>Amend second sentence of paragraph and add new sentence to read:</p> <p>In recent times it has experienced growth, noticeably on the eastern side of the B2139, and is now identified as a medium village in the settlement hierarchy for its moderate range of</p>	Correction to reflect the classification of Thakeham in the settlement hierarchy.

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		services and facilities in the settlement. It is classified as a smaller village in the settlement hierarchy owing to its limited range of services and facilities in the settlement.	
Illustrative Masterplans			
	Figure 7 (p193)	Amend title of figure: "Figure 7: Land West of Ifield <u>illustrative</u> masterplan"	For consistency with para 10.94 (to ensure flexibility and reflect that the masterplan may evolve)
	Figure 8 (p194)	Amend title of figure: "Figure 8: Land North West of Southwater <u>illustrative</u> masterplan"	For consistency with para 10.108 (to ensure flexibility and reflect that the masterplan may evolve)
	Figure 9 (p195)	Amend title of figure: "Figure 9: Land East of Billingshurst <u>illustrative</u> masterplan"	For consistency with para following 10.119 (currently un-numbered) (to ensure flexibility and reflect that the masterplan may evolve)
Glossary			
	Biosolar roofs	New Terminology. Add wording: " Biosolar Roofs: <u>These combine and integrate green roofs and solar panels (an energy generating photovoltaic (PV) system). They seek to maximise both PV output and the footprint for the green roof and provide a mixture of sunny, shaded and sheltered areas which create a matrix of different habitats and water storing capabilities. They can be retrofitted on many existing flat roofs without the need for any structural modification to the building.</u> "	Definition or explanation of what is meant by using the term 'biosolar roofs' referred to in document text.
	Blue infrastructure	New terminology. Add wording: " Blue Infrastructure: <u>this refers to water features, including ponds, lakes, streams, rivers and storm water provision swales, wetlands and canals and their banks. It is important to note that, as defined in the NPPF and below, the term 'green infrastructure' normally applies to all natural environmental features including blue infrastructure.</u> "	Definition or explanation of what is meant by using the term 'blue infrastructure' as referred to in document text

Chapter	Paragraph / Policy Number	Suggested Change	Reason
	Carbon neutral	Addition to text: Offsetting or compensating for carbon emissions (for example from burning fossil fuels) by schemes such as planting trees to absorb carbon or through careful use of design to promote energy efficiency and to avoid carbon emissions. <u>(See Net Zero Carbon.)</u>	Consequential change to signpost to new Glossary entry for Net Zero Carbon.
	Comparison Retail	New terminology. Add wording: <u>“Comparison Retail: Sale of items which tend to be of higher value and are bought less frequently, and are generally compared in terms of price, quality, and attributes such as white goods and clothing. This is opposed to convenience goods, such as groceries.”</u>	Definition of what is meant by using the term ‘Comparison Retail’.
	Local Economic Partnership (LEP)	Delete LEP definition from Glossary.	The Coast to Capital LEP (as with all other LEPs) ceased to exist in March 2024.
	Net Zero Carbon	New terminology. Add wording: <u>“Net Zero Carbon: The Climate Change Act 2008 (2050 Target Amendment) Order 2019 commits the UK to carbon emissions reduction target of 100% by 2050 compared with a 1990 baseline. This is commonly referred to as Net Zero Carbon.”</u>	Definition of what is meant by using the term ‘Net Zero’.
	Non Strategic Policy	New terminology. Add wording: <u>“Non Strategic Policy: Non-strategic policies within the Local Plan set out detailed criteria for specific areas, neighbourhoods or types of development such as heritage, parking and shop fronts.”</u>	Definition of what is meant when using the term ‘Policy’
	Strategic Policy	New terminology. Add wording <u>“Strategic Policy: Strategic Policies address the Local Planning Authorities priorities for development and use of land for its area, setting out the overall strategy for the pattern, scale and design quality of places.”</u>	Definition of what is meant when using the term ‘Strategic Policy’
	Waste Disposal Authority	Amend first sentence to read:	To insert correct term into definition.

Chapter	Paragraph / Policy Number	Suggested Change	Reason
		“... Household Waste Recovery Centres <u>Recycling Sites.</u> ”	