

Cowfold Neighbourhood Development Plan

Regulation 16 Consultation

Submission Version



May 2020

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Appendix 1 – Indicators of Housing Need at Cowfold, Savills

Appendix 2 – Site Location Plan

Appendix 3 - Gladman Developments Ltd submission to Horsham District Council Local Plan Review –
Strategic Housing and Economic Land Availability Assessment (SHELAA) Criteria Consultation
(SA366)

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1 INTRODUCTION

1.1 Context

- 1.1.1 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs.
- 1.1.2 These representations provide Gladman's response to the current consultation on the submission version of the Cowfold Neighbourhood Plan (CNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.
- 1.1.3 Gladman have sought to engage positively and proactively with the neighbourhood plan Steering Group throughout the process of the plan's preparation, including meeting to discuss our promotion land and attending the exhibition event organised by the group on 1 March 2019.
- 1.1.4 As both Councils are aware, Gladman are promoting land in the neighbourhood area, land off Bolney Road, Cowfold. The site represents a suitable and sustainable location for housing.
- 1.1.5 The site is capable of accommodating a number of dwellings and the site could make a significant contribution to the housing needs of Cowfold. The site would be able to include 35% affordable housing and significant new areas of public open space and community infrastructure for the benefit of new and existing residents of Cowfold.
- 1.1.6 We are seeking the allocation of this site through the neighbourhood plan and have included a site submission within these representations.
- 1.1.7 Through these representations, Gladman provides an analysis of the CNP and the policy choices promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the CNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG¹.
- 1.1.8 We currently have concerns about the plan's ability to meet the basic conditions as drafted, which will be detailed below, under the following headings:
- Housing Need at Cowfold
 - Legal compliance; Strategic Environmental Assessment
 - National Planning Policy and Guidance;

¹ Section ID: 41

- Neighbourhood plan policies; and
- Site submission.

2 HOUSING NEED IN COWFOLD PARISH

- 2.1.1 Gladman have commissioned Savills to provide a technical note on the housing needs of Cowfold. This report can be found as Appendix 1 to these representations.
- 2.1.2 The report was submitted alongside our representations to the Regulation 14 consultation², but unfortunately it appears the qualifying body has not fully considered its conclusions. The Regulation 14 consultation and the attached Savills report were both prepared in advance of the housing numbers identified in the District Council's emerging Local Plan (discussed further below).
- 2.1.3 Savills' report considers various scenarios for housing needs in Cowfold over the 20-year period 2011-2031³, with the 'average need' indicating a requirement of 215 dwellings within the Parish over the period. Once completions and consents since 2011 have been discounted (55 dwellings⁴) this results in a residual requirement to deliver 160 dwellings.
- 2.1.4 As is indicated in the report, following the introduction of the standard methodology in Horsham these needs will almost certainly be higher and as such Gladman suggest that the CNP should be planning for a minimum of 160 dwellings through the neighbourhood plan.

² Held between Tuesday 12 November and Tuesday 24 December 2019

³ Consistent with Horsham District Planning Framework

⁴ Cowfold Neighbourhood Plan Submission Version (31/01/20)

3 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

3.1 Legal Requirements

3.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions, set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the CNP must meet are as follows:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
- c) Having regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
- d) The making of the neighbourhood plan contributes to the achievement of sustainable development;
- e) The making of the neighbourhood plan is in general conformity with the strategic policies contained within the development plan for the area of the authority; and
- f) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
- g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

3.2 National Planning Policy Framework, & Planning Practice Guidance

National Planning Policy Framework

3.2.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework (NPPF2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF2018 consultation. This version was itself superseded on the 19th February 2019, when MHCLG published a further revision to the NPPF (2019) which implements further changes to national policy, relating to the Government's approach for Appropriate Assessment as set out in Paragraph 177, clarification to footnote 37 and amendments to the definition of 'deliverable' in Annex 2.

3.2.2 The NPPF (2019) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of neighbourhood plans within which locally-prepared plans for housing and other development can be produced. Crucially, the changes to national policy reaffirms the Government's commitment to

ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 13 states that:

“The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”

3.2.3 Paragraph 14 further states that:

“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

a. The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;

b. The neighbourhood plan contains policies and allocations to meet its identified housing requirement;

c. The local planning authority has at least a three-year supply of deliverable housing sites (against its five-year supply requirement, including the appropriate buffer as set out in paragraph 73); and

d. The local planning authority’s housing delivery was at least 45% of that required over the previous three years.”

3.2.4 The NPPF (2019) also sets out how neighbourhood planning provides local communities with the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing needs. Neighbourhood plans should not promote less development than set out in Local Plans and should not seek to undermine those strategic policies. Where the strategic policy making authority identifies a housing requirement for a neighbourhood area, the neighbourhood plan should seek to meet this figure in full as a minimum. Where it is not possible for a housing requirement figure to be provided i.e. where a neighbourhood plan has progressed following the adoption of a Local Plan, then the neighbourhood planning body should request an indicative figure to plan for, taking into account the latest evidence of housing need, population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

3.2.5 In order to proceed to referendum, the neighbourhood plan will need to be tested through independent examination in order to demonstrate that it is compliant with the basic conditions and other legal requirements before it can come into force. If the Examiner identifies that the

neighbourhood plan does not meet the basic conditions as submitted, the plan may not be able to proceed to referendum.

Planning Practice Guidance

- 3.2.1 Following the publication of the NPPF (2018), the Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018 with further updates being made since in May 2019. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans.
- 3.2.2 Although a draft neighbourhood plan must be in general conformity with the strategic policies of the adopted development plan, it is important for the neighbourhood plan to provide flexibility and give consideration to the reasoning and evidence informing the emerging Local Plan which will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against. For example, the neighbourhood planning body should take into consideration up-to-date housing needs evidence as this will be relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan⁵. This should be undertaken through a positive and proactive approach working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan.
- 3.2.3 It is important that the neighbourhood plan sets out a positive approach to development in the plan area by working in partnership with local planning authorities, landowners and developers to identify their housing need figure and identifying sufficient land to meet this requirement. Furthermore, it is important that policies contained in the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities to come forward. Indeed, the PPG emphasises that;
- “...blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence”⁶*
- 3.2.4 Accordingly, the CNP will need to ensure that it takes into account the latest guidance issued by the SoS so that it can be found to meet basic conditions (a) and (d).

⁵ PPG Reference ID: 41-009-20160211

⁶ Paragraph: 001 Reference ID: 50-001-20160519

4 HOUSING NUMBERS IN THE DEVELOPMENT PLAN

4.1 Adopted Development Plan

- 4.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared in conformity with the strategic policy requirements set out in the adopted Development Plan.
- 4.1.2 The adopted Development Plan relevant to the preparation of the Cowfold Neighbourhood Plan, and the Development Plan which the CNP will be tested against, consists of the Horsham District Planning Framework (HDPF), adopted in November 2015. The HDPF provides the vision, objectives and spatial strategy for the district over the plan period 2011 – 2031. The CNP should therefore seek to support and meet those policies contained in the HDPF.
- 4.1.3 The housing requirement set out in the strategic housing policy requires the Council to deliver at least 16,000 dwellings over the plan period. This figure is reliant on the delivery of large strategic sites, 750 windfall units and neighbourhood plans allocating sites for a combined total of 1,500 dwellings. This policy does not set specific targets for neighbourhood areas and as such to meet the requirements of the Framework the plan should not seek to constrain potential sustainable development opportunities from coming forward.
- 4.1.4 Within the settlement hierarchy Cowfold is designated as one of the medium villages. The medium villages are considered to have a moderate level of services and facilities and community networks, together with some access to public transport. Some of the day to day needs of residents can be met within the settlement.

4.2 Emerging Development Plan

- 4.2.1 Horsham District Council is currently in the process of undertaking a review of the HDPF which will cover the period 2018 – 2036. The recently closed Regulation 18 consultation identified significantly greater housing needs than the HDPF is currently planning for. Using the standard methodology it is anticipated that HDC will need to plan for 17,370 new homes between 2019 and 2036, before even considering any unmet needs from neighbouring Crawley and wider unmet needs from the Coastal Sussex area.
- 4.2.2 The NPPF (2019) sets out that at Paragraph 73:
73. *Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.*

- 4.2.3 Reviews at least every five years are also a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).
- 4.2.4 It clear that the current approach to the spatial distribution of housing within neighbourhood plan areas (including the amount of housing expected to be delivered by neighbourhood plans) is no longer fit for purpose and not in line with the requirements of the NPPF (2019). Instead, the Council will now need to allocate an individual number to designated neighbourhood plan areas in order to help to meet the housing numbers arising from the Standard Method.
- 4.2.5 Although it is not clear, it appears that Cowfold will need to plan for an additional level of need beyond than currently set out in the emerging neighbourhood plan. Therefore, Gladman suggest that the CNP either includes sufficient flexibility to allow adjustment to changes in circumstances, such as the housing target for the area increasing, or greater reliance being placed on medium villages, in advance of this being confirmed through the Local Plan Review.
- 4.2.6 This degree of flexibility is required to ensure that the CNP is capable of being effective over the duration of the plan period and not ultimately superseded under the provisions of s38(5) of the Planning and Compulsory Purchase Act 2004.
- 4.2.7 Using the Savills report, Gladman has attempted to identify an appropriate housing figure for incorporation in the neighbourhood plan. A proportionate breakdown of the identified Horsham-only housing need (ie excluding unmet needs in adjacent authorities) would result in a need in Cowfold of 240 dwellings. This is a very likely (and significant) increase, and Gladman suggests that the CNP seeks to address this now, rather than allowing the neighbourhood plan to become out of date. The standard methodology will apply in Horsham from November this year.

4.3 Impact of COVID-19 and Postponement of Referendums

- 4.3.1 Following the impact of COVID-19, the government introduced new legislation through the Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020. This legislation came into force on 7 April 2020.
- 4.3.2 In the Planning Practice Guidance⁷ the government explains how the legislation impacts upon Neighbourhood Plans:

What changes have been introduced to neighbourhood planning in response to the coronavirus (COVID-19) pandemic?

The government has been clear that all members of society are required to adhere to guidance to help combat the spread of coronavirus (COVID-19). The guidance has implications for neighbourhood planning including: the referendum process; decision-making; oral representations for examinations;

⁷ <https://www.gov.uk/guidance/neighbourhood-planning--2#coronavirus>

and public consultation. This planning guidance supersedes any relevant aspects of current guidance on neighbourhood planning, including in paragraphs 007, 056, 057, 061 and 081 until further notice.

Referendums: All neighbourhood planning referendums that have been recently cancelled, or are scheduled to take place, between 16 March 2020 and 5 May 2021 are postponed in line with the Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020 until 6 May 2021.

...

Paragraph: 107 Reference ID: 41-107-20200513

Revision date: 13 05 2020

- 4.3.3 A referendum for the Cowfold Neighbourhood Plan therefore won't be able to happen until at least 6 May 2021 in accordance with the legislation. This will be more than five years after the HDPF was adopted and therefore it is inevitable that Horsham District Council's housing need will be assessed and revised upwards in advance of the neighbourhood plan proceeding.
- 4.3.4 Cowfold Parish should look to review how it can contribute to accommodating the need arising the whole of district from the Standard Method otherwise the plan risks becoming out-of-date even before it has reached referendum.

5 COWFOLD NEIGHBOURHOOD PLAN POLICIES

5.1 Context

5.1.1 These representations are made in response to the current consultation on the submission version of the CNP, under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This chapter of the representation includes the key points that Gladman raise with regard to the content of the CNP as currently proposed.

5.2 Neighbourhood Plan Policies

5.2.1 This section of the representations provides Gladman's comments on the draft CNP policies. As currently proposed, Gladman believe that a number of the CNPs policies require modification/amendment, before they can be considered consistent with the Neighbourhood Plan Basic Conditions.

Housing

5.2.2 As has been stated earlier, Gladman have commissioned Savills as a consultant to provide a technical note on the housing needs of Cowfold. This report can be found as Appendix 1 to these representations. The report considers various scenarios for housing needs in Cowfold over the 20-year period 2011-2031, indicating an average requirement of 215 dwellings across the scenarios. Once completions and consents since 2011 have been discounted (55 dwellings) this results in a residual requirement to deliver 158 dwellings. As is indicated in the report, the introduction of the standard methodology in Horsham will mean that these needs will almost certainly be higher and as such Gladman suggest that the CNP should be planning for a minimum of 160 new dwellings through the neighbourhood plan.

5.2.3 The report indicates that there is an ageing population in both Cowfold and Horsham. The population of Cowfold has changed significantly since 2011 with a near 20% reduction of 25 to 49 year olds, and an increase in 50 to 64 year olds and 65+ age groups. To seek to reverse this trend, a significant number of new homes will be required within Cowfold to seek to make housing more affordable for younger people and to help them to stay in the area if they wish. This will also help to ensure the vitality and viability of services and facilities in the village.

5.2.4 When the standard methodology is adopted by Horsham, it is likely that Cowfold will be required to deliver 240 dwellings in neighbourhood plan period and to ensure the longevity of the plan and it's policies. Gladman therefore suggests that the CNP should recognise this by providing further housing now. Gladman have submitted Land off Bolney Road, Cowfold as a site appropriate for inclusion within the neighbourhood plan.

5.2.5 Land at Bolney Road could deliver market and affordable housing as well as significant areas of public open space and community infrastructure, at a level appropriate for the village.

Policy 9: Residential Development Principles

- 5.2.6 This policy states that development proposals will be supported subject to them being of a sympathetic scale. Gladman are concerned around the use of the term 'sympathetic', a term likely to be applied subjectively, leading to inconsistencies in the decision-making process. The NPPF Paragraph 16(d) is clear that policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Gladman therefore suggest, to meet basic condition (a), that this term is substituted or removed from the policy.
- 5.2.7 Further, this policy seeks for development to be of a density that is appropriate to its location having regard to the current levels in the immediate area. Again, Gladman has concerns that this approach conflicts with national policy, notably paragraphs 122 and 123 of the NPPF19. These paragraphs are clear that development should make efficient use of land and that where there is an anticipated shortage of land for meeting identified needs, it is especially important that planning policies and decisions avoid homes being built at too low a density, to ensure that developments make optimal use of the potential of each site. The density of surrounding development is not always a suitable guide. This element of the policy should also be amended to ensure conformity with national planning policy and guidance.

Policy 10: Windfall Housing

- 5.2.8 As has been suggested through this representation, the housing needs of Cowfold are likely to be higher in the near future. Gladman suggest that this policy could also support windfall development adjacent to the built-up boundary that is well related to the settlement and compliant with other development plan policies, to add flexibility within the plan. Such flexibility is necessary due to the CNP not currently planning to meet identified housing needs and the potential for otherwise sustainable development proposals to be restricted by the current approach.

Site Allocations: Policy 11: Brook Hill, CNP01 & Policy 12: Potters, CNP03

- 5.2.9 The CNP proposes to allocate two sites of 35 dwellings each to meet what is considered to be the current housing needs of the neighbourhood area. Paragraphs 6.7.2 to 6.7.4 sets out the process that has been followed in selecting the proposed sites with Paragraph 6.7.4 stating that the two proposed site allocations have been selected as best meeting the selection criteria and needs of the community.
- 5.2.10 It would appear that site under promotion from Gladman was discounted at an early stage, for poor conformance with HDPF policies, yet in the Sustainability Assessment the site scores just as well, if not better, than the sites selected for allocation. Further, Gladman raises concerns about some of the scoring of the Bolney Road site, as detailed in response to the Sustainability Appraisal in Section 5.

- 5.2.11 Minimal reasoning is provided to justify Land at Bolney Road's poor conformance with HDPF policy. It is not clear how this conclusion has been derived, and precisely which policies the site would not conform with. The HDPF supports expansion of settlements where the site is allocated in a Neighbourhood Plan and adjoins the settlement edge, is appropriate to the scale and function of the settlement, meets housing needs and is contained within a defensible boundary.
- 5.2.12 Land off Bolney Road is well related to Cowfold. The previous development proposal included a large area of open space and structural landscaping which would strengthen the boundary of Cowfold to the east and would be no greater in scale than the level of housing initially considered in early preparation of the neighbourhood plan. Notwithstanding this point, Gladman consider the housing needs of Cowfold will increase in the near future and as such this site would be capable of supporting a level of development appropriate in scale for the settlement, helping to meet local housing needs. Discounting this site for allocation therefore does not appear justified for this reason.
- 5.2.13 Further, no reasoning is given for the preferred approach being the allocation of the two sites for 35 dwellings rather than a single allocation of a site for a greater number of dwellings. The community benefits a single larger allocation can provide, such as a greater amount of affordable housing and a community park, does not appear to have been a consideration. Indeed, as of October 2019 there were 103 households active on the Council's housing register that have identified Cowfold as an area of choice for permanent rented accommodation.
- 5.2.14 The Savills Report (Appendix 1) suggests that between 146 and 262 dwellings will be needed in Cowfold to meet affordable housing needs in the period 2014 to 2031. As such consideration of a larger site and the greater potential for provision of affordable housing this could provide should be weighted heavily in determining an appropriate strategy for housing allocations.
- 5.2.15 Whilst potential sites have been considered through a Site Assessment exercise, this does not come to any conclusions around the assessment of each site. Further detail is needed in explaining the site selection process and the reasons for selecting the sites that have been proposed for allocation. Failing to provide sufficiently detailed robust reasoning for choosing sites and discounting others has led to other neighbourhood plans failing to meet the basic conditions when examined elsewhere.

Policy 16: Car Parking Provision

- 5.2.16 The minimum parking standards encouraged in this policy require a greater amount of parking provision than the recently updated (August 2019) West Sussex County Council Guidance on Parking at New Developments.
- 5.2.17 Whilst the additional parking numbers set out in this policy could reasonably be presented as aspirational, they should not be a firm requirement. If the parish nevertheless intend it to be so,

the impacts of this level of parking provision should be tested to ensure that these standards do not potentially undermine the viability of development proposals.

5.2.18 Monitoring and Review

5.2.19 Section 9 sets out a commitment to review the CNP within 3 years of being made, or following the adoption of the HDPF review, whichever is later. Whilst Gladman welcome this commitment we suggest that this proposal could be strengthened. As noted above, for the CNP to remain up to date, it will likely be required to be reviewed much earlier than 3 years after being made or adoption of the Local Plan. However, there is a more robust approach open to the Parish Council.

5.2.20 As has been presented through this representation the housing needs of Cowfold are likely to increase following introduction of the use of the standard methodology for calculating the housing needs of Horsham District. Instead of committing to a review, Gladman suggest that the CNP should look to providing increased flexibility through the policy framework and the consideration of further housing sites that could come forward should housing needs increase as predicted.

6 STRATEGIC ENVIRONMENTAL ASSESSMENT

6.1 Context

- 6.1.1 In accordance with PPG ID: 11-027, the preparation of Neighbourhood Plans may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would be likely to have significant environmental effects.
- 6.1.2 The SEA is a systematic process that should be undertaken at each stage of a Plan's preparation. It should assess the effects of a Neighbourhood Plan's proposals and whether they would be likely to have significant environmental effects and whether the Plan is capable of achieving the delivery of sustainable development when judged against all reasonable alternatives.
- 6.1.3 The decision-making and scoring of the SEA should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often, SEA flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.
- 6.1.4 In assessing the reasonable alternatives, conclusions need to be provided on the reasons for rejected options not being taken forward with reasons provided for selecting the preferred approach in light of the alternatives.

6.2 Cowfold Neighbourhood Plan - Sustainability Appraisal

- 6.2.1 The Sustainability Appraisal sets out through Paragraphs 5.6 to 5.9 how potential housing sites have been assessed and why the preferred option has been selected. It is stated that the Parish Council have elected to allocate land at Brook Hill and Potters as the assessment has demonstrated that these (overall and on balance) meet the Sustainability Objectives of the Plan. It is also considered that the proposed allocations present the most sustainable option for the Parish as the sites with the least environmental effects have been allocated.
- 6.2.2 Gladman question this conclusion and suggest that this is not consistent with the assessment of each of the reasonable alternatives. Gladman object to many of the findings of the SA in relation to Land off Bolney Road, Cowfold (Site CNP08) and suggest that if the scoring is amended that this site would in fact present a more sustainable option.
- 6.2.3 Gladman have provided a table below of the scoring we disagree with and the reasons for this below.

Figure 1 – Table of Amended Sustainability Objectives

Objective	Scoring	Commentary	Amended Scoring
Conserve/enhance rural character	X	<p>Entering the village from the East from the A272 Bolney Road the site could be designed and shielded by a mature hedgerow with oak trees flanking the north side of Bolney Road. Therefore, development would not impact the character of the entrance to the village.</p> <p>Built development begins on the south side of the A272 on the approach to Cowfold and as such development the site has the ability to better define the entrance to the village.</p>	0
Protect/enhance biodiversity	X	<p>A previous development proposal on this site has proposed extensive levels of Green Infrastructure providing a buffer to existing woodland and hedgerow boundaries around the entire site. Consisting of approximately 4.2 hectares with new attenuation, hedgerows and ecological enhancement areas including tussock grassland and areas rich in wildflowers.</p> <p>A circular pedestrian route would be incorporated around the development, which will utilise the green infrastrucutre buffers around the boundaries to provide recreational benefits for local residents and provide features that will increase and provide a net gain in biodiversity.</p> <p>It is clear that a positive effect will be demonstrated on this objective and the scoring should amended accordingly.</p>	✓
Protect/enhance heritage assets	X?	<p>Conclusions from a publicly available Heritage Statement in support of a previous planning application on the site demonstrates that as a</p>	0

		<p>minimum the scoring that should be attributed to this site is neutral.</p> <p>The Whilst there a number of listed buildings in the vicinity of the site, in responding to the previous application on site (DC 18 2745) the Council's Conservation Officer advised that the proposal retains the undeveloped rural setting of these heritage assets, which forms an integral part to its setting and original experience, including views. Due to the intervening features of existing built form and trees located east of the Conservation Area, there is very limited potential for inter-visibility between the site and the Cowfold Conservation Area, Leonardslee Grade I Listed Historic Garden, and the Listed buildings within the locality of the site.</p> <p>The committee report for the same application stated: "A non-intrusive archaeological geophysical survey of the land was undertaken in November 2018. No probable features of archaeological interest were recorded during the geophysical survey. The site is not included in the vicinity of a designated heritage asset, although evidence of a prehistoric settlement in the wider area has been identified. Given this it is considered that provided that suitable conditions requiring archaeological investigation mitigation, assessment and analysis be attached to a planning permission, should the application be approved, the proposed development would not be contrary to Policy 34 of the HDPF."</p>
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6.2.4 Should the scoring of site CNP08 be amended to reflect the suggested scoring in the table above the findings that the chosen option is the most sustainable is highly questionable. This is all the more pertinent following the changes made to the scoring of site CNP03 and the potential for negative impacts on the heritage objective, without the wider assessment and conclusions within being revisited.

7 SITE SUBMISSION

7.1 Land off Bolney Road, Cowfold

7.1.1 The Councils are aware of Gladman's land interest at Land off Bolney Road, Cowfold. The proposed development framework from a previous application is attached as Appendix 2 to this submission. The site represents a suitable and sustainable location for housing, well located to the existing urban area. The site could accommodate a number of residential dwellings, including 35% affordable housing and new public open space.

7.1.2 The site offers the opportunity to deliver:

- Local benefits, through investment in the local community;
- New areas of public open space including a new community park and/or significant community infrastructure;
- Improvements to biodiversity through on site mitigation and additional planting of native species and hedgerows;
- On site Sustainable Drainage System (SuDS);
- Potential provision of crossing facilities over Bolney Road to improve pedestrian safety;
- District-wide benefits, in terms of making a strategically important contribution to housing supply and economic objectives; and
- National objectives in boosting the supply of homes and delivering sustainable development.

7.1.3 The site is well-related to the existing urban edge of Cowfold and well-contained by physical features. Development of this site would represent a logical extension to Cowfold with an overall positive affect on Cowfold. In this regard, we submit that the evidence suggests that the site is suitable for allocation in the CNP.

8 CONCLUSIONS

8.1 Assessment against Basic Conditions

- 8.1.1 Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the CNP must be consistent with national planning policy and needs to take account of up-to-date evidence. If the Plan is found not to meet the Basic Conditions at Examination, then the Plan will be unable to progress to referendum.
- 8.1.2 Gladman have commissioned Savills as a consultant to provide a technical note on the housing needs of Cowfold. This report can be found as Appendix 1 to these representations. The report considers 5 scenarios for housing needs in Cowfold over the 20-year period 2011-2031. On average across those scenarios, the requirement is 215 dwellings. Once completions and consents since 2011 have been discounted (55 dwellings) this results in a residual requirement to deliver 160 dwellings. As is indicated in the report, following the introduction of the standard methodology in Horsham these needs will almost certainly increase and as such Gladman suggest that the CNP should be planning for a minimum of 160 dwellings through the neighbourhood plan.
- 8.1.3 In this regard, we have submitted our development proposal off Bolney Road as a suitable site that should be allocated within the CNP.
- 8.1.4 Gladman suggest that further work will be required in justifying why the proposed allocations have been selected as the preferred approach and other sites rejected. The Sustainability Appraisal supporting the CNP suggests that Land off Bolney Road scores just as well as the preferred allocations. However, the social and economic benefits of the development of Land off Bolney Road could be greater and therefore the most sustainable option for the neighbourhood plan to progress.
- 8.1.5 As currently drafted, we submit that the CNP does not meet Basic Conditions (a), (d) and (f) and amendments will need to be made for the plan to meet the Basic Conditions.

Appendix 1– Indicators of Housing Need at Cowfold, Savills

Cowfold Parish

Indicators of Housing Need



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1. Introduction

1.1. Cowfold is a Civil Parish in the local authority area of Horsham. Cowfold sits roughly in the centre of Horsham district and is about 13 miles by road from Horsham town to the north. The village of Cowfold sits at the intersection of the A272 (heading west to Billingshurst and east to Haywards Heath) and the A281 (heading north to Horsham and south to Henfield).

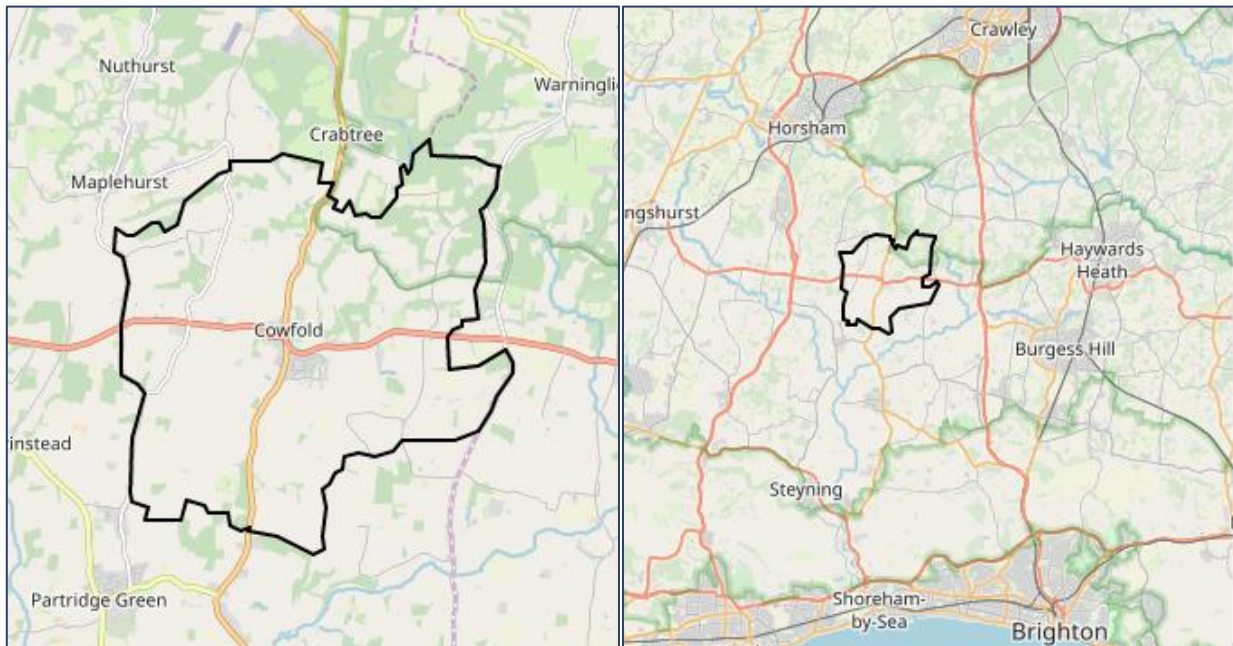


Figure 1. Cowfold parish boundary in relation to the surrounding area

1.2. This report will look at some of the socio-demographic characteristics of Cowfold and interpret what these could mean for housing needs in the parish.

What is housing Need?

1.3. National planning policy and guidance provides a definition of housing need. Housing need is an unconstrained assessment of the number of homes needed in an area over a Local Development Plan period.¹

¹ Paragraph: 001 Reference ID: 2a-001-20190220

- 1.4. Strategic planning authorities are encouraged to use the standard methodology to calculate housing need at the district level. Housing need may be higher than the figure generated by the standard methodology, where there are, for example, growth strategies, housing deals, infrastructure improvements or unmet needs.²
- 1.5. There isn't set guidance for calculating housing need at the sub-district level as it will depend on '*the overall strategy for the pattern and scale of development*' as well as '*the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority*'.³ There are a number of circumstances where it is appropriate to assess housing needs at the sub-district geographical level: for example at the Parish or individual settlement level.
- 1.6. The Parish Council is preparing a Neighbourhood Plan which will provide for the needs of the Parish between 2019 and 2031. The Draft Neighbourhood Plan shows that between 2011 and 2019 56 dwellings have been permitted or completed.⁴ The Draft Neighbourhood Plan refers to a 'Housing Need Consideration' report which "*establishes a range from 40-70 new dwellings*" with the Draft Neighbourhood Plan making two housing allocations for 35 dwellings each. This means that between 2011 and 2031, barring further windfalls, the parish intend to deliver 126 dwellings.

² Paragraph: 010 Reference ID: 2a-010-20190220

³ Paragraphs 65 and 66 of the NPPF

⁴ Paragraph 6.2 of the Cowfold Neighbourhood Plan

2. Evidence of Housing Need

Horsham

- 2.1. The Development Plan for Horsham District comprises the Horsham District Planning Framework (HDPF), adopted November 2015. The HDPF sets out the planning strategy between 2011 and 2031. Policy 3 'Development Hierarchy' states that development will take place in the most sustainable settlements in the district; with Horsham identified as the 'Main Town' where the majority of growth will take place. Cowfold is a medium village reflecting the range of services and facilities located in the villages including education and public transport infrastructure.
- 2.2. Policy 15 Housing Provision states that a minimum of 16,000 new dwellings will be accommodated in the district between 2011 and 2031; equating to an average annual requirement of 800 dwellings. Whilst the HDPF does not prescribe housing need below the Main Town level, Policy 15 states that circa 1,500 dwellings are to be provided throughout the district in accordance with the development hierarchy and through the neighbourhood planning process.
- 2.3. The HDPF housing requirement is based on evidence prepared in 2015 (the March 2015 Housing Need Paper). In 2018 the Government introduced a new method for calculating housing needs described as the standard methodology. In Horsham, the standard methodology results in an increase in housing need from 800 dwellings per annum in the 2015 HDPF to 965 dpa.
- 2.4. In terms of affordable housing, needs are assessed in detail at the district level in the 'Affordable Housing Needs Model Update – Northern West Sussex Housing Market Area' (Chilmark Planning, October 2014). The analysis looks at affordable housing needs over the period 2014 to 2024 (10 years) and assesses the need using several different methodologies. The Report concludes that there is a net need for between 225 and 404 affordable dwellings per annum in Horsham. Between 2014/15 and 2017/18 (4 years) the Council has delivered 848 affordable homes meaning a shortfall of between 52 and 768 affordable dwellings in the first four years of the affordable housing assessment period (depending on the figure used).
- 2.5. The HDPF (Policy 16) sets out a requirement that 35% of all dwellings (on sites over 15 houses) should be affordable (i.e. subsidised through the delivery of market housing). On the basis of an annual requirement for 800 dwellings (in the HDPF between 2011 and 2031) this would result in the delivery of 280 affordable dwellings (sufficient to meet the lower end of the range but not the upper end of the estimate). The 2018 Annual Monitoring Report (at table 7) shows that the average proportion of affordable housing relative to total housing was actually just 24% and therefore below the policy aspiration of the HDPF.



Cowfold

- 2.6. There is no existing housing requirement for Cowfold as the Neighbourhood Plan is still being prepared. The Parish Council has prepared a Housing Need Consideration report which as set out above, identifies a need for between 40 and 70 dwellings up to 2031. This is based on a number of different scenarios using a range of statistics and projections.
- 2.7. The latest population data for Cowfold can be obtained from the mid-year population estimates (2017). In 2017 there were estimated to be 1,845 persons living in the Parish. The level of population in the parish has fluctuated over recent years with 1,897 persons living in the Parish in 2011 reaching a peak of 1,910 in 2013. The 2001 Census recorded 1,864 person living in the parish showing that there has been no net population growth in Cowfold over the last 16 years (in fact the population fell by 19 persons or 1%). Over the same period (between 2001 and 2017) the population of the district of Horsham increased by 15%.

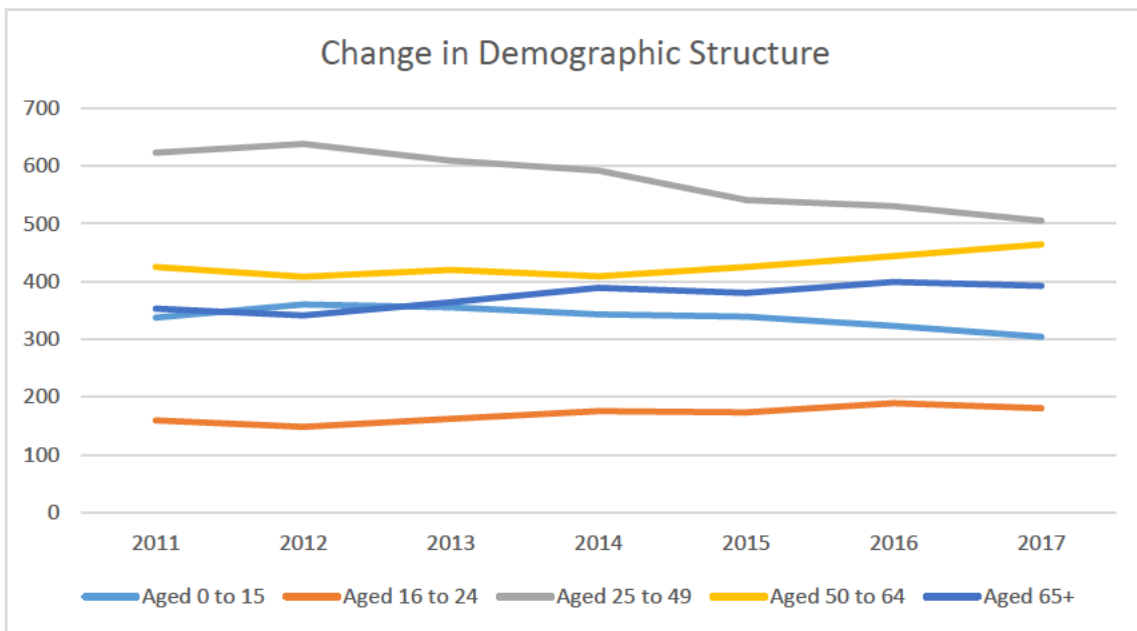


Figure 2. Change in demographic structure since 2011 (Source: Mid-year Population Estimates)

- 2.8. As shown in Figure 2 there has also been a change in the number of residents of certain age groups over recent years. Figure 2 shows a 10% reduction in 0-15 year olds, a 13% increase in 16 to 24 year olds; a reduction in the number of 25 to 49 year olds (-19% or 118 persons) and an increase in the number of 50 to 64 years olds and 65+ year olds (both with a 10% increase). In Horsham over the same period (2011 to 2017) there was a 3% increase in 0-15 year olds, a 2% increase in 16 to 24 year olds; a reduction in the number of 25 to 49 year olds (-2%) and an increase in the number of 50 to 64 years olds and 65+ year olds (both with a 11% and 21% increase respectively). Both areas have an ageing population.

- 2.9. The latest household data for Cowfold comes from the 2011 Census. In 2011 there were 739 households and 771 dwellings (meaning 32 dwellings were either vacant or second homes). This is a net increase of 14 households from 2001 where the census indicated that there were 725 households (and 24 vacant or second homes).
- 2.10. As of October 2019 there were 104 households active on the Council's housing register that have identified Cowfold as an area of choice for permanent rented accommodation. All of these households have an identified need and meet Horsham's qualification criteria.

Potential Housing Need

- 2.11. There are a number of ways that the housing needs of Cowfold could be calculated. There are top down assessments which utilise assessments of need at the district level and attempt to disaggregate down to the parish level. There are also bottom up assessments which seek to understand the level of housing that would be needed in a parish to meet certain socio-economic needs. This briefing note has only utilised existing assessments of need, principally at the district level, and therefore would represent a top down assessment.
- 2.12. We know that Cowfold has a population of around 1,845 persons (2017). This represents 1.32% of the population of Horsham. The latest household information we have is from 2011 where Cowfold had 739 households (1.35% of Horsham's households).
- 2.13. Applying the 2015 HDPF requirement of 16,000 dwellings to Cowfold on a proportionate basis⁵ would indicate a need for around 210 dwellings over the plan period. However the HDPF only allocates 1,500 dwellings outside of the main towns. Cowfold's share of this 'residual' requirement would therefore mean a much lower requirement of around 20 dwellings over the plan period.
- 2.14. It should be noted that the Local Plan is being reviewed and in doing so, the Local Planning Authority will be required to assess its needs in line with up to date planning policy and guidance. If we assume from 2019 that the standard methodology for calculating housing needs is adopted it results in a need for 17,980 dwellings over the plan period.⁶ Using the same proportionate breakdown would result in need in Cowfold of 240 dwellings.
- 2.15. There are undoubtedly significant unmet affordable housing needs in Horsham and Cowfold. On the basis that Cowfold has around 1.35% of Horsham's households living in it, this would require an annual affordable housing need in Cowfold of between 3 and 5 affordable dwellings per annum (on the basis of the Chilmark Planning report). Over the ten years of the Affordable Housing Needs Update this would imply a need for between 30 and 54 affordable dwellings in Cowfold. If one assumes that these affordable dwellings will be delivered through market subsidy as opposed to publically delivered, then they will be required to come forward as part of a mixed tenure scheme whereby the level of affordable housing needed constituted 35% of the total scheme (as per policy). On the basis of the affordable housing range identified above (30 to 54 affordable units over 10 years) this would amount to a total requirement for between 86 and 154 dwellings required over ten years to deliver this affordable housing. Over the period from 2014 (the start of the affordable housing period) to 2031 this would imply a total requirement for 146 dwellings or 262 dwellings depending on which affordable requirement is utilised.

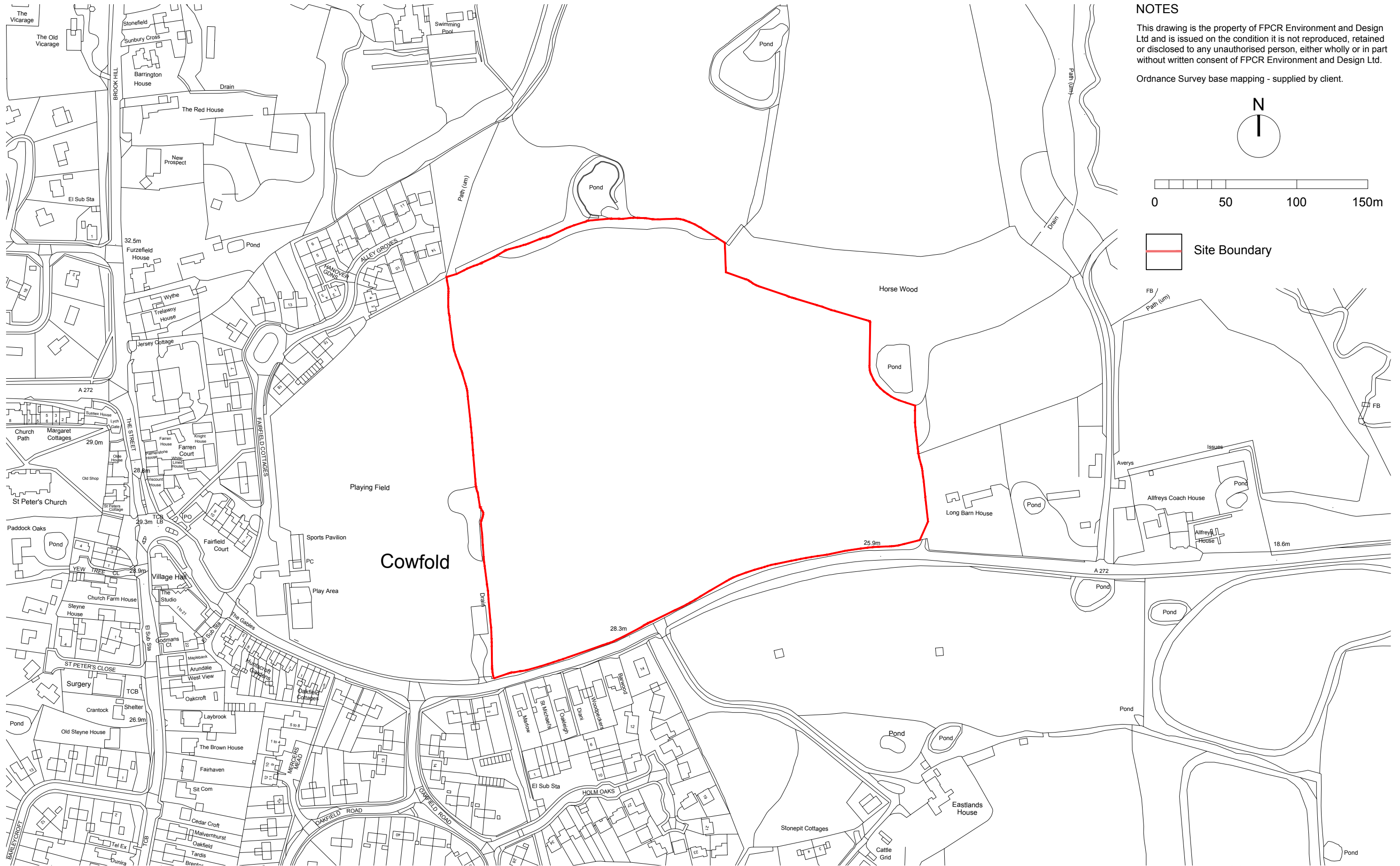
- 2.16. The five scenarios assessed here would indicate a need for between 20 and 262 dwellings over the twenty year plan period. The average is therefore 176 dwellings but in reality, the scenario which apportions the 1,500 dwelling 'residual' requirement for neighbourhood plans is a policy-driven figure from the HDPF, not an assessment of need. Removing this scenario, the average is 215 dwellings. Once completions and consents since 2011 have been discounted (56 dwellings) this results in a residual requirement to deliver 159 dwellings. Delivering a level of housing need commensurate with that identified here would boost significantly the supply of affordable housing in the parish and help to address the ageing of the population apparent from demographic analysis.

⁵ Using an average of 1.34%

⁶ 800 dpa for the first eight years of the plan and 965 for the residual twelve years.



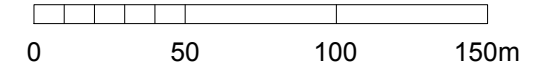
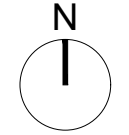
Appendix 2– Site Location Plan



NOTES

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Ordnance Survey base mapping - supplied by client.



**Appendix 3 – Gladman Developments Ltd submission to Horsham District Council
Local Plan Review – Strategic Housing and Economic Land Availability Assessment
(SHELAA) Criteria Consultation (SA366)**

Horsham District Council Local Plan Review – Strategic Housing and Economic Land Availability Assessment (SHELAA) Criteria Consultation

Introduction

The Final Site Assessment Criteria published by Horsham District Council has formed the basis for the information provided in this response which all relates to the suitability of development at Land off Bolney Road, Cowfold, which is being promoted by Gladman Developments Limited. The site was considered as part of the December 2018 SHELAA Housing Land Assessments and has the existing reference of **SA366**.

The submitted site measures a total area of 7.37 hectares, with a developable area of approximately 3.14 hectares. The site is comprised of one single field which is currently in use as arable farmland and is well contained by existing residential development to the north and south west. The site has had two outline planning applications (**references: DC/16/2952 and DC/18/2745**) for up to 110 residential dwellings, and both have been supported with a full suite of technical reports which support the suitability for development on the site.

Gladman would welcome the opportunity to have further discussions with the Council on the sites should they consider that a different level of development may be more appropriate.

Section 1 - Environmental Considerations

Landscape

The site is visually well contained and there is scope to include high quality landscape proposals within the site in keeping with local character. The site is not subject to any landscape quality designation and lies outside of the Green Belt, AONB, and any national, local or other landscape designations. The Landscape and Visual Appraisal (LVA) which forms part of application DC/18/2745 states that the site falls within the Cowfold and Shermanbury Farmlands Local Character Assessment at a district level. The development of up to 110 dwellings is considered to result in no greater than a Minor Adverse / Negligible effect up on the district level LCA at year 15. The site and its immediate surrounds are not subject to any local or national landscape designations and have been assessed in accordance with the GLVIA guidelines as being of Medium landscape value overall.

From using the Horsham District Landscape Capacity Assessment April 2014, the landscape character of Cowfold is described as being gently undulating and comprises a mix of smaller and larger scale fields with some scattered woodlands. The site falls into the entirety of the landscape study area CF3, this area is graded as having a low-moderate overall landscape capacity when combining the factors of the landscape character sensitivity, visual sensitivity and the landscape value assessments. The landscape capacity for this area states that:

“Although there is only low–moderate landscape capacity, the relatively high degree of visibility of the area and the undeveloped green approach into the village results in an overall of low-moderate landscape capacity. It would be very important to maintain a broad green corridor along the A272 and restrict the extent of any development to the east with a woodland buffer to avoid the impression of sprawl into the wider countryside beyond the current built up area boundary south of the A272”

In relation to topography Cowfold and the site are situated on an area of relatively flat and higher ground within the local gently undulating area. The site is typical of the wider topographical context and is located on gently sloping ground with a west-east gradient. The higher point lies at circa 31m AOD located along the north western site boundary. The lower levels at circa 26m AOD along the north eastern extent of the site.

Development on the site would include new landscape planting of native shrub and tree species which would allow for enhancement of the existing boundary vegetation for the visual containment of the site and allow for the retention and enrichment of green corridors which will develop ecological connectivity and ultimately contribute to an increase in biodiversity across the site. There is the potential for the development of a new community park, with structural planting and informal footpaths to be provided on site which would otherwise have little community value when compared the value of being an agricultural field. The above would result in a significant net increase in green infrastructure over that currently present on site and will mitigate any possible landscape impacts.

Biodiversity

The site and its immediate landscape is not covered by any statutory or non-statutory designations. The High Weald Area of Outstanding Natural Beauty (AONB) lies approximately 2km to the north east of the site. There is no inter-visibility between the AONB and the site. The site is adjacent to Horse Wood ancient woodland to the northern and eastern boundaries, due to the nature of this site it will be ensured that any development will give a sufficient stand off from this ancient woodland.

The site comprises a large arable field with wide field margins bound by hedgerows, mature trees, broad-leaved woodland, ancient woodland and dry ditches. The ecological appraisal submitted to support the DC/18/2745 application concludes that the arable land is considered to have limited ecological value; however, the boundary hedgerow is a habitat of principal importance under the NERC Act 2006 but did not classify as 'important' under the Hedgerow Regulations.

In terms of ecological habitats, the ecological appraisal conducted surveys and has assessed the impact of development upon various different species which may already reside in the area. To give a summary, there is a low number of trees on site with potential to support roosting bats were identified within the application site boundary, all of which will be buffered and retained within GI. Commuting and foraging habitats were largely restricted to the hedgerow, scrub and woodlands forming the application site boundaries. Monthly bat surveys have identified common and widespread bat species using the application site, with the majority of activity recorded being that of common and soprano pipistrelle bats. There are also records for dormice nests within the north-eastern periphery of the application site, which will be retained within the GI and will be designed with specific enhancements for dormice, including structure and diversity of native species to enable foraging throughout the year. The three ditches onsite were not considered suitable to support GCN and presence / likely absence surveys were undertaken upon four ponds within vicinity of the application site with no evidence indicating the presence of this species was observed, therefore they are not considered to be a constraint to development.

Any development will retain habitats of high ecological value, including the majority of the southern hedgerow and woodland areas around the peripheries. A small section of hedgerow will need to be removed in order to facilitate access into the site, but this minor loss will be compensated for through the creation of new indigenous hedgerow and structural scrub/woodland planting. The existing green corridors will be enhanced through inclusion of landscape buffers designed to maintain discreet dark corridors for bat species, reptiles and invertebrates. In addition to focussing on the existing features of ecological importance, the overall landscaping scheme will include new tree, shrub and hedge planting, with creation of balancing facilities designed with the intention of maximising biodiversity benefits.

Archaeology

A non-intrusive archaeological geophysical survey of the land was undertaken as part of the DC/18/2745 planning application, and this was used to form the contents of the Heritage Statement which found that there were “no features of archaeological interest were recorded during the geophysical survey” and the archaeological potential of the site is considered overall to be low.

Cultural Heritage

The site does not contain any designated or undesignated heritage assets. However, in the wider study area of the Heritage Statement submitted alongside application DC/18/2745 there is a Grade II Listed Building at Allfreys located c.200m to the east; with another Grade II listed building, Eastlands Farm, located c.430m to the south.

The historic core of the village lies c.200m to the west and is designated as a Conservation Area, at the heart of which stands the Grade I listed Church of St Peter, dating to the 13th century, with a number of Grade II buildings within the Conservation Area associated with the historic nucleated settlement of Cowfold which gradually established itself around the Church and intersecting routeways.

Due to intervening built form, topography and vegetation, as well as the degree of separation afforded by the village recreation ground, none of these assets or their settings were considered to be potential sensitive receptors to the proposed scheme. The intervening built form and modern expansion of the village means that the Site does not share a meaningful relationship with the Conservation Area or its setting, resulting in no impact to these designated assets.

Environmental Quality (Soil/Air/Noise/Water)

The London and South East Region Agricultural Land Classification Map published by Natural England (map reference ALC007) identifies that the site is Grade 3, which is to be considered as a good to moderate land quality.

A “Soils and Agricultural Quality of Land” Report is part of the suite of documents supporting the DC/18/2745 application, which concludes that the land on the site has heavy clay soils with poor drainage which gives the land a subgrade of 3b agricultural quality (limited by wetness). The heavy clay topsoils represent a low to moderate quality resources for reuse in gardens and landscaping. Therefore development of the site would not involve loss of Best & Most Versatile agricultural land.

To consider land contamination a “Phase 1 Geo Environmental Assessment (Desk Study)” accompanies the DC/18/2745 application. This study has shown that any potential sources of contamination confined to a small backfilled pond straddling the west boundary and these are to be considered as low risk. It also identifies that there is a small waste/landfill site 350m to the south of the site but that this is not a source of risk. It is recommended that further works are to be carried before any development commences on site but that there are no overriding concerns regarding land contamination.

The site is not located within the Horsham Cowfold AQMA: Cowfold Village Centre itself but it is in close proximity to this AQMA. An “Air Quality Assessment” supports the DC/18/2745 application and has assessed the impact of development at this site on the wider area during the construction and operational stages of development. Regarding the effects of dust and fine particulate matter effects are not considered to be significant. This correlates with the proposed effects on human health from the increase in the concentrations of NO₂, PM₁₀ and PM_{2.5} which are considered to not be significant from the assessment carried out at seven sensitive receptors.

Due to the site’s proximity to the A272, this will be the dominant source of noise that may potentially effect any future residents on the site. In March 2017, the decision notice for the application DC/16/2952 included at point 4 the potential issue of noise from the A272 as a reason for refusal due to a lack of information provided on mitigation of any potential noise impacts. This matter was addressed in application DC/18/2745 and the “Noise Assessment Report” submitted alongside the application concludes that internal and external noise levels stated in the Horsham District Planning Framework (2015) can be achieved, with sufficient mitigation measures. An indicative layout was used to demonstrate that by optimising the orientation and layout of dwellings and mitigation measures like thermal double glazing and 1.8m fencing around garden areas, this would reduce any possible noise impact. Noise was not raised as a reason for refusal in the DC/18/2745 decision notice so therefore HDC must have been assured by this approach. Noise mitigation measures would be defined on a plot by plot basis at the reserved matters stage.

The site is within an area identified as a brick clay and building stone mineral safeguarding area. Policy M9 of the West Sussex Joint Minerals Local Plan (July 2018) identifies at point ‘iii’ that proposals within safeguarding areas may be permitted where there is an overriding need for the development, outweighing the safeguarding of the mineral or it has been demonstrated that extraction of the mineral is not practicable. The site is located within close proximity to existing residential development meaning that extraction would be impracticable owing to the nuisance it would cause. In addition, it is considered that the provision of housing within Horsham District outweighs the need to safeguard the mineral resource in this location.

Flooding / Drainage

The proposed site is located in an area of Zone 1 Flood Risk (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding) when referencing the Gov. UK Flood Map for Planning and therefore the need for the sequential and exception tests do therefore not apply. With reference to the Environment Agency Surface Water Flood Risk Map, there is some minor surface water flooding in a ribbon along the frontage of the site with Bolney Road. A "Flood Risk Assessment" has been carried out as part of the DC/18/2745 planning application and it concludes that the only water body which could present a source of risk to the development, albeit considered low, currently overflows into a ditch running along the north boundary and into Horse Wood.

As part of this FRA geoenvironmental assessment work was carried out and it was established that ground conditions could prove suitable at least to the southern area of the site for an infiltration-based drainage solution.

Development in this location would incorporate the Sustainable Urban Drainage Systems (SuDS) which will incorporate an attenuation pond to effectively control and discharge water at the present greenfield run-off rate. The proposed piped drainage system will be designed to contain flows from, at minimum, a 1 in 30-year event and will discharge into an attenuation basin located within the north east corner of the site prior to outfall via the flow control structure. Overall flows will be contained on site up to the 1 in 100 year plus climate change event.

Climate / Renewables / Energy Efficiency

As stated above, the flood risk and drainage analysis clearly states how modelling undertaken as part of the most recent planning application identifies that a 1 in 100 year event has been factored into the capacity and that climate has been of considerable importance.

The previous planning application DC/18/2745 was supported by a "Design and Access" statement demonstrates how a development on the site can adopt the twelve Building for Life 12 criteria developed by CABE and the Home Builders Federation. These criteria embody the vision of what new housing developments should be attractive, functional and sustainable. The DAS also considers various design aspects which will enhance sustainability such as the use of ground source heat pumping as a means of energy extraction.

The site benefits from being located near to bus stops which offer a frequent service allowing links to local towns such as Horsham, Henfield and Burgess Hill. The proposals may also provide contributions towards public transport should it be required to increase the frequency, benefitting existing and new residents. There is also the potential for the implementation of electric car charging provision throughout the site which would be secured by s106 agreement or condition.

Section 2 - Social Considerations

Housing

The site has been assessed in the context of providing up to 110 new homes and would provide the full policy compliant level of affordable housing (35%) and there are no viability concerns, as can be proven through the application documents submitted with DC/16/2952 and DC/18/2745, the more recent of these applications has a density of 35 dwellings per hectare and the developable area of the site is 3.14 ha which equates to 43% of the total site area. The precise housing mix and tenure would be determined at the reserved matters stage in conjunction with the local authority, although there are some indicative suggestions on layout and housing types in the Design and Access Statement and a mix in the socio-economic report prepared to support the most recent application.

The site is not available for the development of Gypsy and Traveller accommodation.

The site has the potential to accommodate the needs of specific groups, i.e. provision of homes suitable for first time buyers or dwellings suitable for older people such as bungalows. The proposals are able to accommodate the full 35% affordable requirement (up to 39 units based on 110 in total) on site. The Horsham District Planning Framework (HDPF) identifies at policy 16 a provision of 70% social/ affordable rent and 30% intermediate/ shared ownership will be sought on applicable proposals. The site has the capacity accommodate these policy requirements.

Education

The nearest primary school is St Peters C of E Primary School and it is located 800m away from the site which equates to a 10 minute walk, this is within the nationally “acceptable” walking distance. Should any additional capacity be required within primary or secondary education as a result of the proposals, this can be accommodated via contributions.

Health

The proposals do not provide a new health facility and it is not considered that the site would be appropriate for this type of development. Any additional provision towards health services can be met through contributions following consultation with the appropriate statutory consultees.

The nearest health facility to the site is Cowfold Surgery which is located 500m from the site. The relative proximity of the Medical Centre to the site means it is suitable and practical for patients from the development to access it on foot.

Leisure / Recreation / Community Facilities

On site it is proposed that a new play facility and community parkland within the new network of public open space would be provided.

Adjacent to the site beyond the site's western boundary lies the village recreation ground that includes sports pitches, play facilities, scout hut and new community pavilion. These facilities can be accessed on foot which will be facilitated through the provision of crossing points and additional pedestrian linkages as part of the proposals. The site offers the potential for further contributions to be made to local organisations and groups in order to enhance facilities to the benefit of both new and existing residents.

The village hall is also located 500m away from the site.

Transport

The site is sustainably located with good access to the village centre and surrounding community amenities. Existing facilities of the local area include a primary school with community swimming pool, cafe, supermarket as well as a surgery and a recreational ground.

The nearest bus stop is located next to the village hall and Long Barn House, providing links to Brighton and Horsham every hour using the number 17 bus. The first service arrives in Cowfold at 06:28 and the final service returns at 19:45. The service takes approximately 25 minutes to arrive in Horsham and 50 minutes to travel to Brighton. Horsham Railway station is located approximately 8km from the village and provides links to London St Pancras and Brighton.

Vehicular access will be taken from Bolney Road, and there will be at least two pedestrian points of access, one at the north west and one at the south west edges of the site. There has been a "Transport Assessment" and a "Travel Plan" submitted to HDC as part of the planning application DC/18/2745 which provides significant amounts of detail regarding access arrangements and public transport measures. The submitted Transport Assessment demonstrates that the projected increase in vehicle movements as a result of a development in this location would not result in a severe impact on the local highways network for the purposes of paragraph 109 of the NPPF. Contributions could be made to improve the local highway network to mitigate any impact on capacity.

No PRoWs cross the site. Footpaths pass adjacent to the site – to the north west corner (PRoW Cowfold 1749-1) and within the field to the south of the site and Bolney Road (PRoW Cowfold 1779-1). New paths throughout the site will link to the PRoW, increasing the footpath network and available recreational facilities.

Section 3 - Economic Considerations

Economy

The nearest employment centre to Cowfold would be Horsham which is accessible by public transport. Horsham offers a variety of employment in various sectors and affords the opportunity to travel to London via train, with Central London Stations (London Bridge) being reachable in 53 minutes. Other accessible employment locations include Brighton (53 minutes from Horsham via train) and Crawley (08 minutes from Horsham via train).

In order to accommodate current and future home working trends, the proposals can accommodate high speed broadband, enabling more sustainable working practices in addition to the option of travelling to places of work via public transport.

A socio economic analysis was undertaken as part of application DC/18/2745 which identified a number of significant benefits that would arise as a result of this development. These benefits include:

- Estimated Construction Spend of £15.7 million
- £5.3 million gross value added (GVA) over the build period
- Annual resident expenditure of £3.8 million based on 110 dwellings
- 114 additional economically active residents
- New homes bonus of £700,000 over a 4 year period
- Council Tax receipts of approximately £1.8 million over 10 years.

Retail

In Cowfold village centre there is a Co-Op Foodstore located 500m from the site so can easily be accessed on foot. Wider services are readily accessible within Horsham and can be reached through regular public transport links. It is not proposed to accommodate any additional services or retail areas on the site.

Section 4 - Deliverability

There are no constraints or viability concerns associated with the proposals that would prevent development on the site. It is anticipated that development could commence within 18 months of grant of outline permission. Based on the assumption that the site will deliver 110 dwellings, it has been estimated that it will take 3 years to build out the site at a rate of 36 dwellings per annum.

The site benefits from a single willing landowner and experienced developer who has undertaken a full suite of technical reports as part of a previously submitted application, demonstrating that the proposals can be provided on site within no technical constraints. Any additional infrastructure identified through consultation with statutory bodies can be provided as part of the proposals either through s106 agreement or planning condition to ensure delivery. A full Utilities Appraisal was undertaken as part of application DC/18/2745 and demonstrates access to and capacity within services such as electricity, gas, water and telecommunications networks. A Foul Drainage Analysis was also submitted as part of the recent application and identifies that there is sufficient capacity within the network to accommodate the needs of this proposed development.

Section 5 - Viability

The submission of a previous application inclusive of the various contributions and enhancements to local infrastructure proposed demonstrates that the applicant has no concerns over the viability of the scheme. There are no technical constraints identified that would pose a risk to the viability of associated infrastructure (indeed application DC/18/2745 had no technical objections from statutory consultees) and while it is not anticipated any unexpected costs will arise, there is sufficient flexibility to allow for unforeseen circumstances.

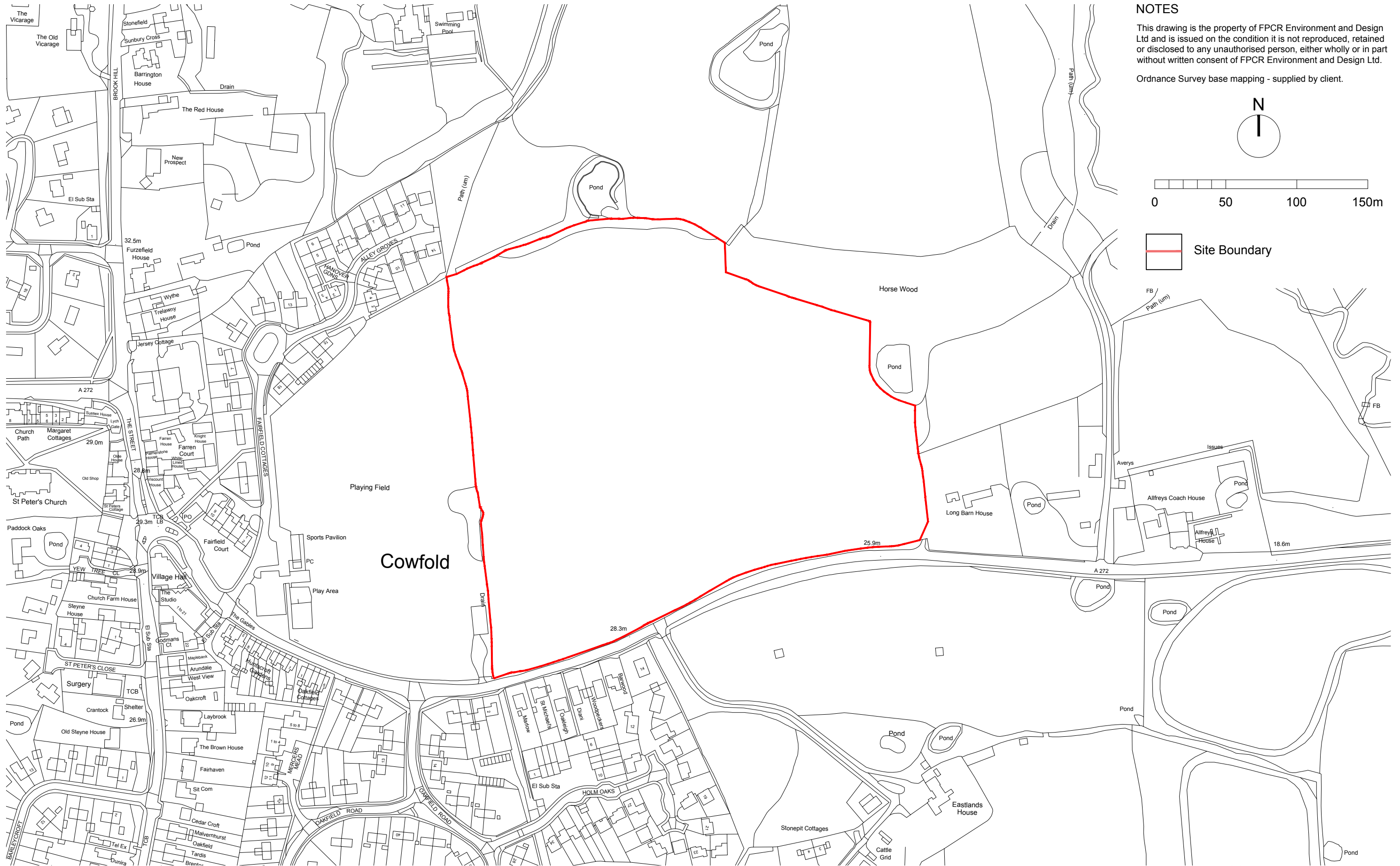
Delivering the scheme is not contingent on the developer purchasing the site, the land will remain within the ownership of the present owner throughout the outline application process to then be passed on to a housebuilder whose interests will be to achieve a reserved matters consent within the outline permission validity timeframe.

Any contributions and enhancements to local services and facilities would be secured via means of a S106 agreement or where appropriate a planning condition, to ensure that all aspects of the application are delivered.

Section 6 - Development Quality

The Design and Access Statement (DAS) and framework Plan submitted as part of application DC/18/2745 provide an indication as to how the site could potentially be developed. The overall layout takes into account notable features of ecological value such as hedgerows and trees, retaining them throughout the site as far as possible while proposing significant levels of additional planting resulting in an overall net gain in habitat. 57% of the total site area is proposed to be public open space which is significantly greater than the amount required by local policy.

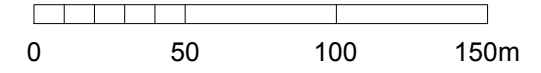
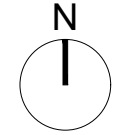
Although currently proposed as an outline application, the DAS previously submitted assesses the local vernacular and identifies how the development can be in keeping through the use of materials, layout and design. The internal layout would be in accordance with Best Practice and provide a safe and well observed network of footpaths and public open space.









NOTES

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Ordnance Survey base mapping - supplied by client.



-  Site boundary 7.37 ha
-  Residential Development 3.14 ha [up to 110 dwellings @ 35dph]
-  Retained trees / hedgerows
-  Public Open Space with structural landscaping
-  Attenuation basin
-  Local Area of Play
-  Main vehicular access routes
-  Shared path pedestrian /cycle routes
-  Main vehicular access point
-  Existing footpaths
-  Potential pedestrian links
-  30m offset from ancient woodland
-  Agricultural access route [5m width requirement]
-  Pump station location

