



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 6: – Infrastructure, Transport and Healthy
Communities

Issue 1

November 2024

Contents

Issue: Whether the approach to Infrastructure Provision is legally compliant, justified, effective, consistent with national policy and positively prepared?.....	4
Question 1: Is Strategic Policy 23: Infrastructure Provision sound?	4
a) Does this policy apply to both development sites allocated in the Plan and other sites not identified in the Plan?	4
b) Is the relationship between this policy and the site specific infrastructure requirements identified for each site allocation clear?.....	4
c) Is this policy sufficiently flexible to deal with and respond to changing circumstances?	5
d) Would this policy potentially prevent development proposed in the Plan from being built as envisaged and if so how will this be addressed?.....	5
Question 2: Is Strategic Policy 24: Sustainable Transport sound?	6
a) With reference to the relevant evidence, would the Plan be effective in ensuring that any significant impacts from the development proposed on the transport network (in terms of capacity and congestion), highway safety and habitats can be cost effectively mitigated to an acceptable degree?.....	6
b) Are the funding mechanisms and strategic transport improvements identified in paragraph 8.13 up to date and are they consistent with the schemes identified in the Infrastructure Delivery Plan?	7
Crawley Western Multi-Modal Corridor (CWMMC)	7
Junctions on the A24.....	8
Are the proposed mitigations up-to-date?.....	8
c) What is the latest position with regard to when a “full” Crawley Western Multi Modal Corridor or sections of it is/are required to be completed to facilitate the development proposed in the Plan?.....	9
d) What is the latest position with regard to the impact of the Plan on the Great Daux roundabout?.....	9
e) Is the requirement for a bespoke-design space for home working justified and effective?	10
Question 3: Is Policy 25: Parking sound, particularly with regard to standards not detailed within the Plan?	10
Question 4: Is Policy 26: Gatwick Airport Safeguarding sound?.....	11
a) Is it clear what constitutes minor development in criterion 2?.....	12
b) What is the latest position with regard to the Development Consent Order for the Gatwick Northern Runway Project are main modifications needed to this policy, other policies in the Plan or the Plan’s evidence base to reflect this?	12
Housing.....	13

Transport.....	13
Site Allocation Policies	14
Question 5: Is Strategic Policy 27: Inclusive Communities, Health and Wellbeing sound?	14
a) Is this policy effective when read alongside other policies in the Plan?	14
Question 6: Is Policy 28: Community Facilities, Leisure and Recreation sound?.....	15
a) Does this policy apply only to land and buildings that are publicly accessible? Is this policy consistent with paragraph 99 of the NPPF?.....	16

Issue: Whether the approach to Infrastructure Provision is legally compliant, justified, effective, consistent with national policy and positively prepared?

Question 1: Is Strategic Policy 23: Infrastructure Provision sound?

1. Yes, the Council considers the policy to be sound. It is:

Positively prepared: the policy refers to, and is supported by, the Infrastructure Delivery Plan, which evidences the level of infrastructure required in order to support the Plan. The policy seeks to ensure that development can come forward as planned in a sustainable way, without any burden being placed on existing infrastructure or communities;

Justified: A great deal of engagement has taken place between the Council and infrastructure providers throughout the preparation of the local plan to establish the likely scale of infrastructure reinforcement and enhancement necessary to ensure the Plan is deliverable, and this has helped to shape the policy's general approach to infrastructure provision;

Effective: The Council has a limited role in securing or delivering much of the infrastructure necessary to support the Plan, and the policy acknowledges the role of the Council in securing the required infrastructure in time to serve new development; and

Consistent with national policy: the NPPF (**paragraph 73** and **paragraph 124**, for instance) makes clear that policies and decisions should ensure development can be supported by the necessary infrastructure and should take into account "the availability and capacity of infrastructure and services", which the policy gives provision for.

a) [Does this policy apply to both development sites allocated in the Plan and other sites not identified in the Plan?](#)

2. Yes, Policy 23 is intended to apply to all sites where development requires access to existing infrastructure or would, directly or indirectly, require the delivery of new infrastructure or enhanced capacity. This includes both sites allocated in the Plan and those which come forward in addition to Local Plan allocations. **Paragraph 8.3** of the supporting text helps to clarify that the Policy wording applies to both allocated sites and other sites by making reference to the requirement for "any new development" to make sufficient infrastructure provision.

3. The policy makes clear the expectation, in accordance with national policy (**NPPF paragraph 20** and **NPPF paragraph 124**) that development will come forward in such a way that it does not place strain on infrastructure, and that if infrastructure upgrades or new provision are necessary, this is coordinated with, and delivered alongside, the development scheme as a whole.

b) [Is the relationship between this policy and the site specific infrastructure requirements identified for each site allocation clear?](#)

4. Yes, the relationship is clear. Policy 23 complements any of the specific infrastructure-related requirements in site allocation policies, which address instances where early engagement with infrastructure providers in the development of the Plan strategy and accompanying **Infrastructure Delivery Plan (IDP) (SP04)** has identified the need for specific items of infrastructure, or enhancement to infrastructure, to support development on those sites, or strategically to deliver the plan as a whole. In

contrast, Policy 43 does not draw out specific infrastructure requirements or needs, signposting instead to the **IDP**. Rather, it establishes expectations around infrastructure delivery, namely that infrastructure will be delivered in time to serve development without any adverse impact on existing communities.

c) [Is this policy sufficiently flexible to deal with and respond to changing circumstances?](#)

5. The policy makes clear that planning obligations and Community Infrastructure Levy payments will be used to secure funding, and that planning conditions should be used to secure improvements at the right time. In this way, the policy makes clear that the Council expects infrastructure which is necessary to make development acceptable to come forward as part of the development. The policy does not go as far as assessing what the specific requirements associated with any proposed development might be. This is because assessments informing a planning application, and the associated engagement with infrastructure developers by developers at that time, would be expected to respond to changes in circumstances surrounding infrastructure requirements or site conditions. In this sense, the policy is sufficiently flexible.

d) [Would this policy potentially prevent development proposed in the Plan from being built as envisaged and if so how will this be addressed?](#)

6. No, the policy would not prevent delivery of any development in the Plan where the promoter or applicant has adequately assessed what infrastructure requirements would be necessary for the site to come forward and has had regard to the **IDP** which makes clear where upgrades or new infrastructure is necessary. The Council commenced work on the **IDP** early in the plan-making process and has progressed iteratively, both helping to inform the location and scale of development options, and with input sought from infrastructure providers at each stage of the process as spatial and specific site strategies have developed. Where appropriate, the Council has shared the outcome of engagement with infrastructure providers with relevant site promoters to ensure any potential barriers to development are addressed as early as possible.
7. The policy is worded in such a way as to make clear what the Council's expectations of infrastructure provision will be based on engagement with infrastructure providers and other relevant bodies, while providing as much certainty as possible for applicants and site promoters in respect of how and when infrastructure should come forward. The policy encourages developers to ensure there is early engagement with infrastructure providers, such as utility companies and the local education and highways authority, specifically to ensure infrastructure requirements do not prevent development coming forward. The Council has itself engaged with developers during the development of the Plan in order to establish deliverability and delivery timescales. This has involved seeking information from site promoters on whether site assessment work has highlighted any delivery issues as a result of infrastructure requirements, and none have been highlighted. This work has informed both the **IDP (SP04)** and the **Horsham Local Plan Viability Assessment (H12)**.
8. While the infrastructure delivery work conducted by the Council has related to the strategic delivery of the Local Plan, the policy encourages all site promoters seeking permission for development to establish infrastructure requirements as part of their early site assessment and feasibility work in order to ensure delivery is not prohibited or delayed.

Question 2: Is Strategic Policy 24: Sustainable Transport sound?

- a) With reference to the relevant evidence, would the Plan be effective in ensuring that any significant impacts from the development proposed on the transport network (in terms of capacity and congestion), highway safety and habitats can be cost effectively mitigated to an acceptable degree?
9. Yes. There are two related key elements of preparing and testing the evidence: technical modelling, and close working with West Sussex County Council (WSSCC) and National Highways to provide technical and qualitative advice to inform the evidence. With regards the latter element, an overview of joint working is provided in the Duty to Cooperate Statement (**SD12**) (**Table 6 and paragraphs 3.93 and 3.94**). The working relationship on the Plan's development with both bodies spans several years, and both have been involved with the preparation of technical evidence (as outlined below) from a very early stage.
10. The **WSSCC Statement of Common Ground (DC11)** confirms the outcomes of joint work on the transport elements of the Plan. Whilst WSSCC submitted a holding objection on the basis of an element of the technical work not having been completed, the Statement of Common Ground (SoCG) (**paragraph 7.4**) confirms that the relevant work has now been completed to the satisfaction of WSSCC. The SoCG **paragraph 7.5** records the agreement between both parties that transport improvements will be necessary, and that these will be funded through developer funding and Community Infrastructure Levy (CIL). It is also agreed that joint work on costing these improvements by way of the Infrastructure Delivery Plan will continue.
11. The **National Highways SoCG (DC15)** confirms that this body is satisfied with the approach taken in the Plan in respect of highways mitigation. **Paragraph 4.4** of the SoCG signals that National Highways has endorsed a checklist prepared by HDC to evidence compliance with DfT Circular 01/2022, which demonstrates that development should not have unacceptable impacts on the safety, reliability and operation of the Strategic Road Network (SRN). Paragraph 4.7 confirms that National Highways agree that the various studies forming the technical evidence base have been undertaken robustly. Also paragraph 4.10 confirms that National Highways agree to the measures proposed by HDC for mitigating the impacts of development on the SRN (which are generally minor in nature).
12. Turning to the technical assessment of highways impacts, the key evidence is contained in the **Horsham Transport Study (I06)**. This report is the culmination of several years' work, whereby a comprehensive strategic level model was developed to test the highways impacts of the local plan, then variations of the emerging spatial strategy were tested as the Plan evolved. Given the study began in 2019, the Council's consultants undertook a further Horsham Transport Study Review (**I07**) in November 2023 to consider the ongoing validity of the main study's data and findings (which was confirmed). At the same time, the **Horsham Highways Safety Study (I07)** assessed whether there would be impacts from Local Plan development on the safety of the road network, and highlighted mitigations required to ensure user safety to be delivered as part of wider improvements to the network.
13. The **Horsham Transport Study Executive Summary (I08)** summarises the work outlined above. Paragraphs 1.1.2 to 1.1.4 explain that a high-level transport assessment has been undertaken to support the Local Plan, using a SATURN highway model (this being an industry standard modelling package). The model has been used to assess the impact of a number of development scenarios on both the local highway network managed by WSSCC, and the SRN managed by National Highways, with other modelling packages looking at mitigation options at a more detailed level. The models represent potential impacts as of 2039, for the morning (0800 – 0900) and afternoon (1700 – 1800) peak hours. The assessment was undertaken as per Planning Practice Guidance (PPG), in the section titled Transport Evidence Bases in Plan Making and Decision Taking (Ref ID: 54-001-20141010 to 54-012-20150313).

14. Section 1.2 explains that ultimately, a Preferred Scenario, representing the near-final Spatial Strategy, was modelled in late 2022 to inform the mitigation strategy required to demonstrate that the Local Plan can be delivered. It also explains in paragraphs 1.2.3 and 1.2.4 that changes to the Preferred Strategy ahead of finalisation of the Regulation 19 Local Plan have been considered, and that these changes are either negligible or otherwise appropriate to represent a 'worst-case scenario'.
15. It is important to note that the modelling has built in sustainable transport measures, by way of reflecting Strategic Policy 24 - Sustainable Transport, and as part of the 'vision and validate' approach now supported by bodies responsible for transport planning. Paragraphs 1.6.2 and 1.6.3 of the Executive Summary notes that the Plan's development sites are proposed to comprise of sustainable site masterplanning and transport measures that promote and encourage more sustainable active travel modes. This includes enhanced public transport, cycling and walking facilities compared with what might normally be expected from development. Further strategic off-site sustainable mitigation measures are expected to be led by WSCC and supported by funding from strategic developments and CIL monies. These have been factored in to inform a level of car trip reduction in addition to the internalisation of trips within strategic sites, and the site-specific non-physical measures. The car trip reduction rates have been used in the peak-hour trip forecasts.
16. Paragraphs 1.6.4 to 1.7.6 then set out the mitigation measures needed to ensure that impacts from Local Plan development do not worsen capacity issues on the road network. Some junctions were identified as just over the threshold of non-acceptable impact and can be resolved through the prioritisation of active modes of travel, public transport measures, general trends towards 'virtual mobility' (essentially home working) and, in some cases, adjustments to traffic signal phasing. Where it has been demonstrated that such measures would not be enough to fully mitigate the impacts of the Local Plan, more substantial mitigation measures have been identified and modelled for effectiveness. There are three such junctions, all of which are on the A24 – Buck Barn junction, Hop Oast Roundabout and Washington Roundabout. These are considered further in the response to Q2(b) below.

b) [Are the funding mechanisms and strategic transport improvements identified in paragraph 8.13 up to date and are they consistent with the schemes identified in the Infrastructure Delivery Plan?](#)

17. Local Plan **paragraph 8.13** identifies strategic improvements which are necessary in the medium to long term. Two of these relate to the proposed strategic development West of Ifield, and the other three have been identified in the **Horsham Transport Study (I06)** as outlined in the response to Q2(a) above. The Council's responses for each of these in turn are as follows.

[Crawley Western Multi-Modal Corridor \(CWMMC\)](#)

18. The 'middle section' referred to in the Plan is a proposed new road which will come forward as part of the West of Ifield strategic development, and is necessary to provide access to the proposed development. Its delivery will be undertaken by Homes England as the promoter and masterplanner for that site – this is confirmed in Homes England's representation (see response #1193327¹) and reflected on page 86 of the **Infrastructure Delivery Plan (IDP) (SP04)**. This site will be considered in detail under Matter 9, Issue 1.
19. In respect of the full CWMMC, please see the response to Q.2(c) below.

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

[Junctions on the A24](#)

20. The **Horsham Transport Study (I06)** has designed and tested junction improvement schemes for the three A24 junctions in need of upgrade as a result of Local Plan development. In the **Horsham Transport Study Executive Summary (I08)**, paragraph 1.7.7 provides high-level costs for these three schemes. These include 20% contingency uplifts, and a 44% Optimism Bias which accounts for the tendency to initially underestimate costs for such schemes.
21. **Paragraph 1.7.4** of the **Horsham Transport Study Executive Summary (I08)** outlines that the Buck Barn junction will require additional right-turning lanes to the A272 westbound from the A24 and two lanes through the staggered junction from the A272 carrying on westbound (there is currently one). The modelling indicates that this will be effective in relieving congestion impacts resulting from the Horsham Local Plan and background forecast traffic growth as the junction output results show operation within capacity. The cost estimate is £5,175,806. The **IDP (SP04)** lists the scheme on page 87 and identifies that funding will come from developer contributions (including CIL), and potentially WSCC and/or Government funding.
22. **Paragraph 1.7.5** of the **Horsham Transport Study Executive Summary (I08)** states that the Hop Oast Roundabout will require signalisation. In the main **Horsham Transport Study (I06)**, Figure 6-4 shows that additional lanes will also feature, or alternatively, bus priority lanes added (however this is not the option recommended in the study). The modelling indicates that this will be effective in relieving congestion impacts resulting from the Horsham Local Plan and background forecast traffic growth as the junction output results show operation within capacity. The cost estimate is £3,107,922. The **IDP (SP04)** lists the scheme on page 87 and identifies that funding will come from developer contributions (including CIL), and potentially WSCC and/or Government funding.
23. **Paragraph 1.7.6** of the **Horsham Transport Study Executive Summary (I08)** sets out that the Washington Roundabout will require additional left turn lanes. In the main **Horsham Transport Study (I06)**, Figure 6-1 shows that additional lanes will also be introduced onto the roundabout gyratory. The modelling indicates that this will be effective in relieving congestion impacts resulting from the Horsham Local Plan and background forecast traffic growth as the junction output results show operation within capacity. The cost estimate is £3,810,572. The **IDP (SP04)** lists the scheme on pages 86-87 and identifies that funding will come from developer contributions (including CIL), and potentially WSCC and/or Government funding.

[Are the proposed mitigations up-to-date?](#)

24. The **Horsham Transport Study Review (I07)** considers changes in circumstance and evidence over time and provides analysis of the impacts of these changes. The **Horsham Transport Study Executive Summary (I08)** summarises these findings: it notes in **paragraphs 1.2.2 to 1.2.4** that provided updates to numbers in the Preferred Scenario since the completion of modelling, with reductions in numbers to be delivered in the Plan period at North West of Southwater and at North Horsham (Mowbray). The **Horsham Transport Study Review (I07) (paragraph 2.2.2)** also notes changes to numbers in five of the settlements. Paragraph 1.8.1 summarises that analysis of these changes shows no increase of greater than 12 vehicle trips during peak hours because of these changes. **Paragraph 1.8.2** also notes that analysis of traffic forecast changes resulting from the Covid pandemic concluded that the impact of Covid on travel behaviour is evidently resulting in a reduction of highway travel demand – a 12% reduction in the morning peak, and a 7% reduction in the afternoon peak. **Paragraph 1.8.3** then states that “...the analysis still indicates the need for mitigation due to impact of the Local Plan and high volume-to-capacity ratio. As such, even with the reduced 2039 traffic forecast, mitigation remains necessary as stated within the existing transport study.” West Sussex County Council has advised that further improvement at Great Daux roundabout will require inclusion in the mitigation strategy as, although previously identified and designed, it is not yet fully funded from consented development but

severe impacts would result in its absence. This is further addressed in the response to Q.2(d) and a main modification is proposed to paragraph 8.13 to refer to this scheme in the plan as a necessary strategic improvement, which is also being added to the IDP (**HM035 of SD14: Schedule of Suggested Modifications to the Regulation 19 Local Plan**). It is clear therefore that the mitigation strategy remains up-to-date with this proposed addition.

25. In respect of costings for the schemes, these were up-to-date at the time of the main study publication, which was December 2022. However as made clear in the Disclaimer at the start of the IDP (on page 4), details of timescales and estimated financial costs are provided only as a guide and are likely to be subject to change. Section 1.1.2 of the IDP further notes that the IDP is a 'live' document and will continue to evolve and be updated throughout the Local Plan review process and as necessary over the life of the Plan.
26. The consultants also considered any impacts relating to the post-modelling shift of the Plan period from 2022-39 to 2023-40. The conclusion is set out in the **Horsham Transport Study Review (I07)** paragraph 1.1.5:

“Given that the overall Plan period of 17 years remains the same as for previous stages of this study and given also that there is inevitable uncertainty about development quanta and travel behaviour in the later years of the Plan period, the findings of this study are nevertheless still considered to be representative, and the approach proportionate.”

c) [What is the latest position with regard to when a “full” Crawley Western Multi Modal Corridor or sections of it is/are required to be completed to facilitate the development proposed in the Plan?](#)

27. The full CWMMC is not necessary in its entirety to support delivery of the Plan strategy but is considered necessary in the long term to support future development beyond the Plan period. This is acknowledged in the Plan, which notes “(...sections of which may be delivered beyond the Plan period)”. Therefore, it has not been included in modelling undertaken for the Horsham Transport Study and at this stage has not been costed or mechanisms identified for its delivery, although the IDP (page 86) indicates funding sources will be from developer contributions (which includes CIL) plus potentially WSCC, Homes England and Government funding. The CWMMC is supported in the West Sussex Transport Plan as a medium term priority for both Crawley and Horsham transport strategies.
28. It may be helpful to note that the **Crawley Borough Council Statement of Common Ground (DC04)**, paragraph 7.3(f), confirms the position agreed between the two councils to “*work jointly to seek a clear commitment from Homes England or other appropriate government bodies to the full delivery of the sustainable transport corridor link to support the scale of development proposed in any allocation. To support such a commitment this will include any necessary indicative identification of land within respective Local Plans, and consideration of funding models including developer contributions.*” This clarifies that the full corridor is not a specific planning requirement at this point in time, but nevertheless should be worked towards to support medium to long-term growth.

d) [What is the latest position with regard to the impact of the Plan on the Great Daux roundabout?](#)

29. It is assumed that this question follows on from the WSCC Regulation 19 representation regarding the transport evidence base. At the time the Regulation 19 was first published, WSCC lodged a holding objection in part due to the need for a sensitivity test on the A24/A264 Great Daux roundabout on the basis that the agreed scheme (which pre-dates the Horsham Transport Study) is currently not fully funded (and therefore cannot be assumed to come forward without further funding from Local Plan-led developments).

30. As noted in paragraph 10 of this statement, the West Sussex County Council SoCG (**paragraph 7.4**) confirms that all relevant work has now been completed to the satisfaction of WSCC. In the case of Great Daux, the completed evidence is contained in the **Horsham Transport Study Addendum – Technical Note TN001 (I10)**. The results of the sensitivity testing (**paragraph 2.31** of the Addendum) indicated that a mitigation scheme is required with the Local Plan traffic added. This will be added to the IDP in consultation with WSCC and a main modification (**HM035**) is accordingly proposed in **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024** to add it to **paragraph 8.13** of the Plan as noted above in the response to Q2 (b).

e) [Is the requirement for a bespoke-design space for home working justified and effective?](#)

31. This requirement is justified. The requirement for new homes to include space for home working is considered important to not only reflect the modern working culture, but also as it is a core part of the 'vision and validate' approach which seeks to promote sustainable choices that overall reduce the need to travel. The NPPF, in **paragraph 104b**, expects that "*patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*" (HDC emphasis added.). The expectation for plan-makers to promote reducing the need to travel is also set out in PPG in the section 'Transport evidence bases in plan making and decision taking' (Ref ID: 54-003-20141010), especially in the third bullet point which encourages evidence base work to "*highlight and promote opportunities to reduce the need for travel where appropriate*". This has duly been picked up by and built into the Horsham Transport Study which underpins the Plan's approach and policies (see paragraph 16 of this statement with regards 'virtual mobility').

32. The policy criterion is also effective. It dovetails well with Plan Policy 40: Improving Housing Standards in the District which expects all dwellings to meet the Nationally Described Space Standards. Should this aspect of Policy 40 be considered sound, it is logical and inherently practical for domestic dwellings to incorporate some space suitable for home working. There is no prescriptive approach as to how home working space should be provided, so it will be up to the developer to decide how best to design internal spaces to accommodate this flexibly.

33. It is also considered standard practice for new homes to provide for gigabit capable broadband connection. The Council's view is that it would make no commercial sense for housebuilders not to incorporate this as standard, given their customers' likely expectations for this to be available.

Question 3: Is Policy 25: Parking sound, particularly with regard to standards not detailed within the Plan?

34. Horsham District is a predominantly rural in character. **EN07 (Settlement Sustainability Review)**, highlights that most settlements have very limited access to public transport, and many facilities are not easily accessible on foot or bicycle. Car ownership levels in the District are therefore high as a consequence. Whilst there are a number of policies in the plan that seek to address this matter, it is not an issue that can be solely resolved through the local plan. **Paragraph 107** of the NPPF enables the use of local parking standards. Policy 25 therefore seeks to ensure that development that comes forward takes the requirement for parking into account, but also ensures that it is well designed, incorporates electric charging facilities and provides for cycle parking and storage. It is therefore considered to be **positively prepared** and **consistent with national policy**.

35. In addition to more general evidence set out above that shows public transport in the district to be very limited, Guidance on Parking at New Developments² has been produced by West Sussex County Council. This guidance is kept under review, and there is also potential for standards to change over the

² https://www.westsussex.gov.uk/media/1847/guidance_parking_res_dev.pdf

plan period taking into account emerging design guidance documents produced by HDC. This reflects feedback from local communities and Members and an evidence base review undertaken by this Council in February 2023, highlighted that the parking standards in Horsham town centre may be less generous than average when compared against other town centre locations (**HDC14: Parking and Street Design Study**). Therefore, in order for the policy to be effective over the plan period, it is considered that the policy should refer to current standards, and enable updates to take place over the plan period to ensure that the policy remains justified and effective over the plan period as a whole.

Question 4: Is Policy 26: Gatwick Airport Safeguarding sound?

36. During the preparation of these hearing statements Gatwick Airport Limited contacted the Council regarding an update to the aerodrome safeguarding area. The area has been extended which means Horsham District is now entirely within the Gatwick Airport aerodrome safeguarding consultation area. In light of this a modification is proposed to the supporting text of Policy 26 to reflect the change (**SM28 in Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**).

37. The Council considers Policy 26 to be sound. It is:

Positively prepared: the policy responds to the need not to prohibit airport expansion, while allowing appropriate development to take place in the vicinity of the airport and across the District;

Justified: this is an important policy in light of the potential for expansion at the airport during the Plan period. The policy deals with two distinct issues under one policy heading. Firstly, it addresses the safeguarding of land to the south of the airport in anticipation of a second runway to the south of the airport, or an expansion of facilities to allow for expanded operation on the airport. Secondly, it addresses aerodrome safeguarding which requires applicants to consult Gatwick Airport Ltd with respect to potential hazards in the vicinity of the airport as a result of development in the aerodrome safeguarding area. The Council's approach is consistent with the conclusion of the Crawley Borough Council Local Plan examination. The recent **Crawley Borough Local Plan Inspector's Report (HDC07 in Horsham District Council's Examination Library)** shows that despite the conflict between the pressures on available land for development and the need to safeguard land for airport expansion, the Inspector was satisfied that there remains a need for continued, precautionary safeguarding of land to the south of the airport. Until there is indication in national policy terms, or in GAL's own commitments to expansion, that no safeguarding for a southern runway is necessary, the Council considers continued, precautionary safeguarding is necessary.

Effective: while the policy does not make reference to a two-runway operation, it is worded to ensure sufficient safeguarding should a southern runway come into operation, and would also allow for operational expansion at the airport should an alternative to the southern runway come forward.

Consistent with national policy: the Council has been cognisant of the uncertainty around the second southern runway however, has concluded that a safeguarding policy is necessary in order to be compliant with national policy. **Para 106.c) of the NPPF** states that planning policies should "identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development".

Paragraph 3.66 of Aviation 2050: The Future of UK aviation (2018)³, makes clear that safeguarding land is "prudent" in order not to hinder sustainable aviation growth, even after the outcome of the

³ <https://assets.publishing.service.gov.uk/media/5c34aba0e5274a65b8ec7919/aviation-2050-web.pdf>

Airports National Policy Statement (ANPS)⁴ which came before **Aviation 2050**, and favoured expansion at Heathrow airport.

38. Two Regulation 19 representations were made in relation to the safeguarded land to the south of the airport and its interaction with **Strategic Policy HA2: West of Ifield**, one by Gatwick Airport Ltd (Rep #1197269⁵) and one by Homes England (Rep #1193327⁶) which both reference the interaction between the safeguarded land to the south of the airport and the West of Ifield masterplan. While these representations have been noted and considered, the Council does not agree that changes to the policy are required, given that the intention to safeguard land, while allowing appropriate development to take place, is clear and it is unnecessary to duplicate policy requirements throughout the Plan, which should be read as a whole.

a) [Is it clear what constitutes minor development in criterion 2?](#)

39. A modification has been proposed by the Council in the Council's **Schedule of Suggested Modifications to the Regulation 19 Local Plan (SD14)** in order to clarify what is meant by "minor development". This amendment takes account of a similar modification made by Crawley Borough Council's Main Modification Local Plan (Policy GAT2), which was requested by the Crawley Local Plan Inspector, and agreed with Gatwick Airport.

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

40. Gatwick Airport Limited's (GAL) application for a Development Consent Order (DCO) for the Northern Runway Project (NRP) was accepted by the Planning Inspectorate in late 2023, and the examination period commenced on 27 February 2024, closing six-months later on 27 August 2024. While Horsham District does not fall within the Order Limits, the district boundary is approximately 150 metres from the proposed works south of the airport. During the DCO examination the Council was registered as an Interested Party and engaged positively and proactively with the examination process. As a neighbouring authority, the Council was one of the ten host or adjoining Councils (known as the Joint Local Authorities (JLAs)) making coordinated written and verbal representations to the Examining Authority (ExA).

41. Following the close of the examination, the ExA have three-months (or until 27 November 2024) to make a recommendation to the Secretary of State on the application. Following this, the Secretary of State is expected to decide whether the DCO should be permitted or not within a further three months (no later than 27 February 2024). The Council has noted that decisions on some DCOs have been delayed in recent months and is mindful that there is the potential for delay on the NRP DCO.

42. The Council does not consider that there is any reason, in the context of the NRP DCO, for adoption of the Plan to be delayed as a result of the DCO. It does not consider that any modifications to Policy 26 are necessary, or that any modifications of other Plan policies, or the evidence base underpinning the Plan, would be either necessary or proportionate on the basis of a DCO where the decision-making process is not concluded and the outcome is, therefore, unknown. The DCO, and potential expansion at the airport more widely, has been a consideration throughout development of the Plan and its evidence

⁴ <https://assets.publishing.service.gov.uk/media/5e2054fc40f0b65dbed71467/airports-nps-new-runway-capacity-and-infrastructure-at-airports-in-the-south-east-of-england-web-version.pdf>

⁵ https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/showUserAnswers?qid=9331459&voteID=1197269

⁶ https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/showUserAnswers?qid=9331459&voteID=1193327

base and, specific work by the West of Ifield site promoter has taken into account the forecasts of surface transport demand produced by GAL for the DCO. On balance, highway travel demands in Horsham District will be more dispersed and are not likely to affect the transport mitigation strategy of improved public transport and active travel facilities with highway improvements at key A24 junctions. While there have been a number of delays to the Local Plan's progress meaning the examination of the Plan is now taking place after the examination of the DCO, it would not be proportionate to require the Council to reassess its evidence base or policies on the basis of the DCO when the outcome is unlikely to be known until the first quarter of 2025 at the earliest.

Housing

43. The **Northern West Sussex Strategic Housing Market Impact Assessment (SHMA) (H01)** assesses overall housing need in the HMA, and in Horsham District specifically, and also considers whether the growth of Gatwick airport would justify planning for a higher housing need figure than indicated by the standard method (in line with PPG Paragraph: 010 Reference ID: 2a-010-20201216). **Paragraphs 5.59 to 5.80** of the SHMA explain how expansion would impact job and housing demand in Horsham and conclude that the likely growth "is unlikely to support additional housing demand over and above the figures generated by the standard method" (**paragraph 5.79**).
44. The JLAs concurred with GAL during the examination that the NRP DCO would not result in any change to the demand for housing in the District or the Northern West Sussex Housing Market Area (HMA). As part of the application, GAL submitted their own document into the NRP DCO Examination Library **Appendix 17.9.3 Assessment of Population and Housing Effects**⁷ (APP-201 in the NRP Examination Library) which examines how projected labour supply both with and without the NRP would impact demand for housing, and whether the housing level being planned for in the airports Travel to Work area was sufficient to accommodate this demand based on housing trajectories. The approach and conclusions were examined and the JLAs agreed with GAL that pipeline housing supply and that being delivered through emerging Local Plans would be sufficient to meet future demand both with and without the project.
45. The JLAs raised a specific concern with regard to the impact that the construction phase of the development, which would take place between 2024 and 2038, would have on the housing market, and specifically on temporary accommodation as non-home-based workers relocate to the area. This issue was explored in hearings and in written submissions and, while GAL did not accept that there would be any impact, a £1 million fund to address any detrimental impacts on access to affordable or temporary housing has been secured as part of a signed Section 106 agreement.

Transport

46. During the DCO examination, the Council suggested that GAL should consider whether further work was required to assess the interaction between the Project and other development, in particular the proposed development West of Ifield. Transport evidence was produced by GAL and submitted into the DCO evidence library to indicate that there would be no significant impacts on the transport network as a result of the Project and planned or proposed development in the District. WSCC as the highways authority are not of the view that any additional sensitivity testing is required. Nonetheless, the JLAs have sought further support from GAL for the transport infrastructure proposed to be delivered through the Plan, particularly for sustainable transport infrastructure links between the West of Ifield site allocation (**Strategic Policy HA2**) and the Crawley Western multi-modal corridor, given the proximity of

⁷ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020005/TR020005-000884-5.3%20ES%20Appendix%2017.9.3%20Assessment%20of%20Population%20and%20Housing%20Effects.pdf>

the site to the airport, as well as seeking to ensure that surface access and mode share commitments made by GAL can be secured through the DCO itself .

47. Statements of Common Ground between the Council and West Sussex County Council (**DC11**) and between the Council and National Highways (**DC15**), confirm that the Council has undertaken the necessary transport modelling as part of the transport evidence base, which provides an appropriate assessment of transport conditions through to the end of the Plan Period.

Site Allocation Policies

48. The West of Ifield site allocation policy (HA2) has been drafted in knowledge that there is likely to be expansion at the airport, in some form, during the Plan Period. The West of Ifield masterplan has taken account of noise contours, with no residential or other noise sensitive uses permitted where aircraft noise will exceed 60Db LAeq 16hr (or 57dB for Gypsy and Traveller accommodation). The policy also stipulates that any application must include assessment of aircraft noise.
49. The Council fed into GAL's preparatory work on the Cumulative Effects Assessment (CEA) which was submitted into the NRP DCO examination⁸ (APP-045 in the NRP DCO Examination Library), and this ensured that the West of Ifield site was included in the CEA as a Tier 2 development, allowing the possible interaction of airport expansion and the development to have been considered as far as is feasible with the level of information available.

Question 5: Is Strategic Policy 27: Inclusive Communities, Health and Wellbeing sound?

50. Yes, the policy is considered to be sound. It is:

Positively prepared: the policy provides a clear framework which proposals can draw from to show how they demonstrate and respond to the needs of communities;

Justified: the policy responds to evidence that there are a number of demographic characteristics in the District, such as pockets of deprivation and an aging population, which should be addressed by proposals to ensure communities remain cohesive and their needs are addressed;

Effective: it sets out the expectation that development proposals will have had considered, and responded to, the characteristics of the wider District and the local area in order to ensure proposals result in healthy, mixed and sustainable communities; and

Consistent with national policy: Chapter 8 of the NPPF sets out how development should support the health and wellbeing of communities, by identifying and addressing specific needs (**paragraph 92.c**) and by addressing the wider social and cultural needs of communities outlined in **paragraph 93** of the NPPF.

a) Is this policy effective when read alongside other policies in the Plan?

51. The Policy is intended to be read alongside other policies in the Plan, in particular:

- Strategic Policy 6: Climate Change
- Strategic Policy 19: Development Quality
- Strategic Policy 20: Development Principles

⁸ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020005/TR020005-000837-5.1%20ES%20Chapter%2020%20Cumulative%20Effects%20and%20Inter-Relationships.pdf>

- Strategic Policy 23; Infrastructure Provision
- Policy 28: Community Facilities, Leisure and Recreation
- Strategic Policy 38: Meeting Local Housing Needs

52. It draws together a set of principles and development requirements that respond to the demographic of the District, such as the aging population, young people, the rural nature of the District and communities, with more general principles of good planning. These include access to well designed, high quality accommodation and public spaces which enable and encourage inclusive communities, and well as behaviours which support health and wellbeing across the population of the District. At its core, the policy supports and reinforces other policies in the Plan whilst also encouraging development proposals to make clear how they have addressed needs across the District's population.

Question 6: Is Policy 28: Community Facilities, Leisure and Recreation sound?

53. Yes, the Policy 28 is considered to be sound. In summary, it is:

- **Positively Prepared:** the policy is supported by the Infrastructure Delivery Plan, which evidences the level of infrastructure required in order to support the Plan. The policy seeks to ensure that development can come forward as planned in a sustainable way, without any burden being placed on existing infrastructure or communities.
- **Justified:** the policy is considered to form part of an appropriate strategy which ensures development appropriately addresses the needs it generates and meets all three objectives of sustainable development (social, economic and environmental). It is informed by the **Open Space, Sport and Recreation Review, June 2021 (I04)** and the **District Wide Community Facilities Assessment, February 2021 (I01)**. Regard is also given to the **Horsham District Playing Pitch Strategy Stage C and D, May 2019 (SS12 and SS13)** and the **Council's Built Sport Facility Strategy (SS11)**.
- **Effective:** it clearly sets out the requirements that development will be expected to address and is deliverable of the plan period. The policy makes clear the provision of community facilities will be supported, subject to specified criteria, places a requirement on residential development to meet its generated open space and indoor facilities requirements in accordance with the standards set out in Table 4 of the policy, and seeks the retention of existing community facilities or services unless specified exceptions apply.
- **Consistent with national policy:** in particular, paragraphs 98 and 99, and also 8, 28, 84, 92 to 97, 123, 124, 130 and 187 of the NPPF, and PPG (Ref ID: 37-001-20140306).

54. **Table 4 of Policy 28 (SD01)** sets out the local minimum standards of size and accessibility for community spaces & buildings, and signposts to the quality standards that developments will be expected to deliver. These standards are based on the findings of the **Open Space, Sport and Recreation Review, June 2021 (I04)** and the **District Wide Community Facilities Assessment, February 2021 (I01)**. The open space quantity and accessibility standards that inform **Table 4 of the Plan (SD01)** are set out in **Tables 3, 4, 8.3.5, 8.3.6, 8.4.4, 9.2.1 9.3.1, 11.1.1 and 11.1.2 of I04**, and the community hall standard is set out in **Section 6.1 of I01**.

55. The **Open Space, Sport and Recreation Review, June 2021 (I04)** took into account the **Horsham District Playing Pitch Strategy Stage C and D, May 2019 (SS12 and SS13)**, the **Council's Built Sport Facility Strategy (SS11)**, as well as the Sport England's Playing Pitch Calculator and the Sport England Sports Facility Calculator. To facilitate appropriate delivery within the large strategic allocations **Appendix 1 of the Open Space, Sport and Recreation Review, June 2021 (I04)** sets out the requirements based on the quantum of development proposed for each of the potential strategic sites in 2021.

56. It is noted that Sport England (#1191960⁹) raise concern that the **Council's Playing Pitch Strategy (SS12 and SS13)** and **Built Facilities Strategies (SS11)** adopted in 2019 are out of date. The Council recognise that Sport England encourage Local Authorities to undertake regular playing pitch assessments which helps to keep Sport England's Playing Pitch Calculator up to date. However, their approach focuses on playing pitches and does not cover bowling greens and tennis courts which have to be assessed separately. It is also focused on accredited teams and National Governing Body (NGB) requirements rather than informal community sport and does not readily translate into standards to be applied to development.
57. For this reason, the **Open Space, Sport and Recreation Review, June 2021 (I04)** includes the space required for outdoor sport, (excluding golf), within the Parks and Gardens typology to ensure sufficient space is secured and brought forward within new development (see **paragraphs 10, 275, 278, 360, Part 2, Table 1, Table 1.1** of **I04**). When considering what type of open space should be provided regard will be given to relevant available documentation, such as, Playing Pitch Strategies, Sport England's Calculators, as well as NGBs' reports including **Sussex County Football Association – Local Football Facility Plan Horsham (SS14)**. **Paragraphs 49 and 52** of **I04** make clear hectares for golf provision is omitted because this would significantly skew the totals. A separate document assesses the supply and demand of golf, which is set out in **Golf Supply and Demand Assessment, February 2021 (I02)** and **Golf Supply and Demand Assessment Update, December 2022 (I03)**.
58. The indoor facilities standards are drawn from **section 6.1** of the **District Wide Community Facilities Assessment, February 2021 (I01)** with regard also given to the findings of the Sport England Sports Facility Calculator and the **Council's Built Sport Facility Strategy (SS11)** or subsequent updates.
- a) [Does this policy apply only to land and buildings that are publicly accessible? Is this policy consistent with paragraph 99 of the NPPF?](#)
59. No, the policy does not only apply to land and buildings that are publicly accessible. It also applies to private land and buildings as detailed in **paragraph 8.39 of the Plan (SD01)**. This is considered to be consistent with **the NPPF** which does not confine such references to just public facilities, for example **paragraphs 8, 84, 93, 98, 99 and 123**, and in its **glossary**, it defines 'open space' making clear it covers all such space of public value, including visual amenity. **PPG (Ref ID: 37-001-2014036)** also makes clear open space includes all open space of public value including formal sports pitches. Indeed, private facilities are important provision for sectors of the community which would otherwise be dependent upon public provision thereby creating more pressure on existing facilities.
60. A number of respondents to the Regulation 19 consultation raised concern that the policy does not duplicate paragraph 99 of the NPPF or fully accord with it, and others raised concern over the lack of a requirement for the provision of a sporting needs assessment. Horsham District Council does not consider it necessary to duplicate paragraph 99 of the NPPF but has included in the **Schedule of Suggested Modifications to the Regulation 19 Local Plan (SD14)** a modification **HM043** to help ensure it better reflects its aims and objectives.
61. Whilst it is recognised paragraph 99 of the NPPF does not include testing feasibility/viability of existing use, this is nonetheless explicit within the planning system and **paragraph 124** of the NPPF, which is why it is reflected in criterion 3.b of the policy. This is particularly relevant to built facilities because they require maintenance, whilst open spaces are finite resources within urban areas so even when abandon

they can have 'open space' value for wildlife and amenity. The policy therefore provides clarity that evidence will need to be provided that the site is no longer feasible within a community facility use. For example, a proposal for the use/redevelopment of a dilapidated cricket pavilion for housing would need to demonstrate the site is no longer needed for cricket or other sport/open space or another community facility use. This helps to ensure community facility uses that remain viable are not lost to higher value uses and is considered to be consistent with the aims of **paragraph 99 of the NPPF**.